OhioEPA

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

12/20/07

RE: Proposed Title V Chapter 3745-77 Permit
13-18-00-1618
SIFCO Forge Group, Inc.

Attn: Stacey Coburn AR-18J
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Coburn:

The proposed issuance of the Title V permit for SIFCO Forge Group, Inc., has been created in Ohio EPA's State Air Resources System (STARS) on 12/20/07, for review by USEPA. This proposed action is identified in STARS as 3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact me at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: Cleveland Division of Air Pollution Control
File, DAPC PIER

State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 12/20/07	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 13-18-00-1618 to:
SIFCO Forge Group, Inc.
970 East 64th Street
Cleveland, OH 44103

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B001 (Boiler #1)
75.7 mmBTU/hr natural gas fired boiler used for space heating and processes

B002 (Boiler #2)
75.7 mmBTU/hr natural gas fired boiler used for space heating and processes

B003 (Boiler #3)
75.7 mmBTU/hr natural gas fired boiler used for space heating and processes

P010 (Rotary Forge Furnace)
Gas fired rotary heating furnace rated at 11.7 mmBTU/hr used for heating steel billets (no. 5546)

P023 (Pickle Line)
Pickle line with 9 acid tanks, 10 rinse tanks, and caustic scrubber

P024 (Heat Treat Furnace)
Heat Treat Furnace - Gas-fired (no. 534) (12 MMBTU/HR)

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Cleveland Division of Air Pollution Control
Penton Media Building, 4th Floor
1300 East 9th Street
Cleveland, OH 44114
(216) 664-2324

Ohio Environmental Protection Agency

_____

Chris Korleski
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter. (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).)

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply

reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit**,** and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable

requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:

   i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

   ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

   iii. a combination of i. and ii. above.

   The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
   (Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

22. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

5. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

6. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or

b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. The following insignificant emissions units are located at this facility:

P001: heat treat furnace #2157 - OAC rule 3745-31-03(A)(1)(c)
P003: pusher forge furnace #2155 OAC rule 3745-31-03(A)(1)(c)
P006: pusher forge furnace #2154 - OAC rule 3745-31-03(A)(1)(c)
P007: slot forge furnace #2174 - OAC rule 3745-31-03(A)(1)(c)
P008: pusher forge furnace #2175 - OAC rule 3745-31-03(A)(1)(c)
P009: pusher forge furnace #2223 - OAC rule 3745-31-03(A)(1)(c)
P016: Wheelabrator abrasive machine - PTI 13-1744 (issued 09/23/1987)
P019: rotary forge furnace #3700 - OAC rule 3745-31-03(A)(1)(c)
P026: ATD natural gas heat treat furnace - PTI 13-3486 (issued 05/26/1999)
Z001: gas box furnace #125 - OAC rule 3745-31-03(A)(1)(c)
Z007: heat treat furnace #380 - OAC rule 3745-31-03(A)(1)(c)
Z008: heat treat furnace #168 - OAC rule 3745-31-03(A)(1)(c)
Z010: heat treat furnace #2063 - OAC rule 3745-31-03(A)(1)(c)
Z011: boiler 5.2mmBtu/hr machine room - OAC rule 3745-31-03(A)(1)(a)
Z013: boiler 5.2mmBtu/hr - OAC rule 3745-31-03(A)(1)(a)
Z017: 8 hand-held grinders controlled by 4 cyclones -
OAC rule 3745-31-03(A)(1)(y)
Z020: Hagan rotary forge furnace #1 - OAC rule 3745-31-03(A)(1)(c)
Z021: Hagan rotary forge furnace #2 - OAC rule 3745-31-03(A)(1)(c)
Z022: Hagan rotary forge furnace #3 - OAC rule 3745-31-03(A)(1)(c)
Z023: Hagan rotary forge furnace #4 - OAC rule 3745-31-03(A)(1)(c)
Z025: box gas furnace #8001 - OAC rule 3745-31-03(A)(1)(c)

Each insignificant emissions unit at this facility must comply with all applicable State and Federal regulations, as well as any emissions limitations and/or control requirements contained within a permit-to-install for that emissions unit. Insignificant emissions units listed above that are not subject to specific permit-to-install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

P011 electric heat treat furnace
P014 Wheelabrator table blast
P015 Wheelabrator abrasive machine
P027 Wheelabrator table blast
Z006 abrasive cutting saw
Z018 electric induction furnace
Z024 1,000 gallon gasoline tank
Z026 1,000 gallon diesel tank

2. The following emissions units at this facility have been shut down: P002 (pusher forge furnace), P004 (slot forge furnace), P005 (slot forge furnace), P012 (tempering furnace), P013 (Pangborn table blast), P017 (batch pickle line), P018 (heat treat furnace), P020 (exogas furnace), P021 (exogas furnace), P022 (heat treat furnace), P025 (heat treat furnace), Z002 (slot forge furnace), Z003 (gas box furnace), Z004 gas box furnace), Z005 (pusher forge furnace), Z009 (heat treat furnace), Z012 (slot forge furnace), Z014 (production furnace), Z015 (stress relief furnace), Z016 (heat treat furnace), Z019 (heat treat furnace), T001 (#6 fuel tank).

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #1 (B001)

Activity Description: 75.7 mmBTU/hr natural gas fired boiler used for space heating and processes

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
75.7 mmBtu/hr natural gas fired (no oil standby) Keeler model DS.10.18 steam boiler for process steam and space heating	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.
Company ID: #1919 Boiler No. 1	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
	OAC rule 3745-18-06(A)	See A.II.1 below.
	OAC rule 3745-21-08(B)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a The design of the emissions unit and the technology associated with the current operating practices satisfies the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirements to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements

1. Records of any corrective actions taken on the natural gas fired burner system shall be maintained for a minimum period of five (5) years and shall be made available for review during normal business hours.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports to the Cleveland Division of Air Quality that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emission limitations specified in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
0.020 lb PE/mmBtu actual heat input

Applicable Compliance Method:
Compliance with the particulate matter emission limit in Section A.I.1 may be determined by the emission factor of 7.6 lb/mmCF from Table 1.4-2, AP-42: 7.6 lb/mmCF / 1,020 mmBtu/mmCF = 0.0075 lb/mmBtu.

Stack testing shall be conducted at the request of the Ohio EPA using Methods 1-5 pursuant to 40 CFR Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitation:
Visible particulate emissions shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limits shall be demonstrated by visible emission evaluations performed in accordance with OAC Rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1))

VI. Miscellaneous Requirements

1. A copy of these "Terms and Conditions for Emission Units" shall be posted at the emissions unit at a location easily visible and accessible to the boiler operators.

(Authority for term: OAC rule 3745-77-07(C)(1))

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #2 (B002)

Activity Description: 75.7 mmBTU/hr natural gas fired boiler used for space heating and processes

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
75.7 mmBtu/hr natural gas fired (no oil standby) Keeler model DS.10.18 steam boiler for process steam and space heating.	OAC Rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.
Company ID: #1929 Boiler No. 2	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
	OAC rule 3745-18-06(A)	See A.II.1 below.
	OAC rule 3745-21-08(B)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a The design of the emissions unit and the technology associated with the current operating practices satisfies the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirements to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements

1. Records of any corrective actions taken on the natural gas fired burner system shall be maintained for a minimum period of five (5) years and shall be made available for review during normal business hours.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports to the Cleveland Division of Air Quality that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
0.020 lb PE/mmBtu actual heat input

Applicable Compliance Method:
Compliance with the particulate matter emission limit in Section A.I.1 may be determined by the emission factor of 7.6 lb/mmCF from Table 1.4-2, AP-42: 7.6 lb/mmCF / 1,020 mmBtu/mmCF = 0.0075 lb/mmBtu.

Stack testing shall be conducted at the request of the Ohio EPA using Methods 1-5 pursuant to 40 CFR Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitation:
Visible particulate emissions shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limits shall be demonstrated by visible emission evaluations performed in accordance with OAC Rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1))

VI. Miscellaneous Requirements

1. A copy of these "Terms and Conditions for Emission Units" shall be posted at the emissions unit at a location easily visible and accessible to the boiler operators.

(Authority for term: OAC rule 3745-77-07(C)(1))

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #3 (B003)

Activity Description: 75.7 mmBTU/hr natural gas fired boiler used for space heating and processes

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
75.7 mmBtu/hr natural gas fired (no oil standby) Keeler model DS.10.18 steam boiler for process steam and space heating.	OAC Rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.
Company ID: #1930 Boiler No. 3	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
	OAC rule 3745-18-06(A)	See A.II.1 below.
	OAC rule 3745-21-08(B)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a The design of the emissions unit and the technology associated with the current operating practices satisfies the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirements to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements

1. Records of any corrective actions taken on the natural gas fired burner system shall be maintained for a minimum period of five (5) years and shall be made available for review during normal business hours.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports to the Cleveland Division of Air Quality that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emissions limitations specified in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
0.020 lb PE/mmBtu actual heat input

Applicable Compliance Method:
Compliance with the particulate matter emission limit in Section A.I.1 may be determined by the emission factor of 7.6 lb/mmCF from Table 1.4-2, AP-42: 7.6 lb/mmCF / 1,020 mmBtu/mmCF = 0.0075 lb/mmBtu.

Stack testing shall be conducted at the request of the Ohio EPA using Methods 1-5 pursuant to 40 CFR Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitation:
Visible particulate emissions shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limits shall be demonstrated by visible emission evaluations performed in accordance with OAC Rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1))

VI. Miscellaneous Requirements

1. A copy of these "Terms and Conditions for Emission Units" shall be posted at the emissions unit at a location easily visible and accessible to the boiler operators.

(Authority for term: OAC rule 3745-77-07(C)(1))

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rotary Forge Furnace (P010)

Activity Description: Gas fired rotary heating furnace rated at 11.7 mmBTU/hr used for heating steel billets (no. 5546)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
11.7 mmBtu/hr, indirect fired, natural gas rotary forge furnace (No. 5546) used for heating steel billets.	OAC rule 3745-31-05(A)(3) (PTI 13-734 as issued 5/13/81)	The requirements of this rule includes compliance with OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-18-06(E)
	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from the rotary forge furnace shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	Exempt (See Section A.I.2.a)
	OAC rule 3745-18-06(E)	Exempt (See Section A.I.2.b)
	OAC Rule 3745-21-08(B)	See A.I.2.c below.

2. Additional Terms and Conditions

2.a No control measures are required for this emissions unit.

2.b The sulfur dioxide emissions from this emissions unit are due solely to the combustion of natural gas. Pursuant to OAC rule 3745-18-01(B)(13), the natural gas and the combustion air are not considered to be part of the emissions unit's total process weight which is used in establishing the allowable sulfur dioxide emission limitation. The only other materials introduced into the emissions unit are the metal pieces that are to be pre-heated, heated or reheated. The total weight of the metal pieces could be used to establish the sulfur dioxide allowable emission limitation. However, using the total weight of the metal pieces to establish the sulfur dioxide allowable emission limitation would yield a very high allowable sulfur dioxide emission limitation compared to the sulfur dioxide emissions generated by the combustion of the natural gas. Therefore, a sulfur dioxide emission limitation has not been established for this emissions unit.

2. Additional Terms and Conditions (continued)

2.c The permittee has satisfied the "best available control techniques and operating practices required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology (BAT) requirements established in PTI No. 13-734. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirements to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall matintain a record of the type and quantity of fuel burned in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports reports that identify each day when a fuel other than natural gas was burned in this this emissions unit. Each report shall be submitted to the Cleveland Division of Air Quality (CDAQ) within 30 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation:

Visible emissions of fugitive dust from the rotary forge furnace shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with USEPA Test Method 9 of 40 CFR, Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3). For purposes of verifying compliance with this limitation, visible emission observations shall be performed at the non-stack egress points (e.g., windows, doors, roof monitors) serving this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

VI. Miscellaneous Requirements

1. This fugitive emissions unit was installed in March of 1977.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Pickle Line (P023)

Activity Description: Pickle line with 9 acid tanks, 10 rinse tanks, and caustic scrubber

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Pickle line with 9 acid tanks, 10 rinse tanks, and a caustic packed tower scrubber with a mist eliminator.	OAC rule 3745-31-05(A)(3) (PTI 13-03267 as issued 6/3/1999)	Particulate emissions (PE) shall not exceed 0.01 gr/dscf, 2.4 lbs/hour, 57.6 lbs/day, and 10.5 tons/year. Nitrogen Oxides (NOx) emissions shall not exceed 5.0 lbs/hour, 120.0 lbs/day, and 21.9 tons/year. Visible Particulate emissions shall not exceed a 5% opacity as a 6-minute average. The requirements of this rule includes compliance with OAC rule 3745-17-07(B).
	OAC rule 3745-17-07(A)	The visible emissions limitation established by this rule is less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(B)	Visible emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	The control measures specified by this rule are equivalent to the control measures specified under OAC rule 3745-31-05(A)(3). See A.I.2.b below.
	OAC rule 3745-17-11	The emission limitation established by this rule is less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The control measures specified by OAC rule 3745-31-05(A)(3) is a caustic packed tower with a mist eliminator.

II. Operational Restrictions

1. The scrubber shall be maintained in accordance with the following operating parameters at all times while the emissions unit is in operation:

a. the scrubber water supply pressure shall be continuously maintained at a value of not less than 30 pounds per square inch (gauge);

b. the scrubber water flow rate shall be continuously maintained at a value of not less than 75 gallons per minute; and

c. the average of the three pressure drop gauges across the top, middle, and bottom of the scrubber shall be continuously maintained at a value between 3.5 and 6.5 inches of water.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the water spray header pressure, the water flow rate and the pressure drop across the scrubber while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The permittee shall collect and record the following information each day:

a. the water spray header pressure, in psig, on a once/shift basis;

b. the scrubber water flow rate, in gallons per minue, on a once/shift basis;

c. the down times for the capture (collection) system, control device, and the associated emissions unit; and

d. the pressure drop across the scrubber, in inches of water, on a once/shift basis.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from the area immediately above the capture system serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. the total duration of any visible emission incident; and
c. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality that identify all periods of time during which the following scrubber parameters were not maintained at, above, or within the required levels:

a. the water spray header pressure;

b. the scrubber water flow rate; and

c. the pressure drop across the scrubber.

(Authority for term: OAC rule 3745-77-07(C)(1))

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the area immediately above the capture system serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Cleveland Division of Air Quality by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
0.01 gr/dscf and 2.4 lbs PE/hour

Applicable Compliance Method:
Compliance with the lbs/hour limit may be determined by multiplying the maximum outlet concentration of 0.01 gr/dscf by the maximum volumetric air flow (18,000 acfm), and the appropriate conversion factors of 1 dscf/1 acf, 60 minutes/hour, and divide by 7,000 grains/lb.

Compliance shall be determined using USEPA test methods 1-5 of 40 CFR Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitation:
57.6 lbs PE/day

Applicable Compliance Method:
The daily emission limitation was established by multiplying the hourly emission rate by 24 hours per day. Therefore, compliance with the daily limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

(Authority for term: OAC rule 3745-77-07(C)(1))

1.c Emission Limitation:
5.0 lbs NOx/hour

Applicable Compliance Method:
Allowable was based on stack testing of NOx emissions performed in November of 2004. Company found that uncontrolled emissions were at 3.3 lbs NOx/hour.

Compliance shall be determined using USEPA test methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1))

1.d Emission Limitation:
120.0 lbs NOx/day

Applicable Compliance Method:
The daily emission limitation was established by multiplying the hourly emission rate by 24 hours per day. Therefore, compliance with the daily limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

(Authority for term: OAC rule 3745-77-07(C)(1))

1.e Emission Limitations:
10.5 tons PE/year

Applicable Compliance Method:
The tons/year limitations were developed by multiplying the lb/hour by the maximum operating schedule of 8,760 hours/year, and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitation.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements (continued)

1.f Emission Limitation:
21.9 tons NOx/year

Applicable Compliance Method:
The tons/year limitations were developed by multiplying the lb/hour by the maximum operating schedule of 8,760 hours/year, and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitation.

(Authority for term: OAC rule 3745-77-07(C)(1))

1.g Emission Limitation:
Visible particulate emissions shall not exceed 5% opacity as a six-minute average

Applicable Compliance Method:
Compliance with the visible particulate emission limits shall be demonstrated by visible emissions evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1))

1.h Emission Limitation:
Visible emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:
Compliance with the visible particulate emission limits shall be demonstrated by visible emissions evaluations performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures specified in USEPA Reference Method 9.

2. Emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal.

The emissions testing shall be conducted to demonstrate compliance with the allowable mass emissions rate for particulate matter and nitrogen dioxides.

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 1-5 for PM and Methods 1-4 and 7 for NOx of 40 CFR Part 60, Appendix A. If applicable, alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality (CDAQ).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland Division of Air Quality. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland Division of Air Quality's refusal to accept the results of the emissions test(s).

Personnel from the Cleveland Division of Air Quality shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test(s) and submitted to the Cleveland Division of Air Quality within 30 days following the completion of the test(s). The permittee may requets additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland Division of Air Quality.

(Authority for term: OAC rule 3745-77-07(C)(1))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Heat Treat Furnace (P024)

Activity Description: Heat Treat Furnace - Gas-fired (no. 534) (12 MMBTU/HR)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
12.0 mmBtu/hr, indirect fired, natural gas heat treat furnace (No. 534).	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
	OAC rule 3745-18-06(E)	See A.I.2.b below.
	OAC rule 3745-21-08(B)	See A.I.2.c below.

2. Additional Terms and Conditions

2.a The sulfur dioxide emissions from this emissions unit are due solely to the combustion of natural gas. Pursuant to OAC rule 3745-18-01(B)(13), the natural gas and the combustion air are not considered to be part of the emissions unit's total process weight which is used in establishing the allowable sulfur dioxide emission limitation. The only other materials introduced into the emissions unit are the metal pieces that are to be pre-heated, heated or reheated. The total weight of the metal pieces could be used to establish the sulfur dioxide allowable emission limitation. However, using the total weight of the metal pieces to establish the sulfur dioxide allowable emission limitation would yield a very high allowable sulfur dioxide emission limitation compared to the sulfur dioxide emissions generated by the combustion of the natural gas. Therefore, a sulfur dioxide emission limitation has not been established for this emissions unit.

2.b The design of the emissions unit and the technology associated with the current operating practices satisfies the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirements to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

III. Monitoring and/or Record Keeping Requirements

1. For each day which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in the emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emission limitation specified in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
0.020 lb PE/mmBtu actual heat input

Applicable Compliance Method:
Compliance with the particulate matter emission limit in Section A.I.1 may be determined by the emission factor of 7.6 lb/mmCF from Table 1.4-2, AP-42: 7.6 lb/mmCF / 1,020 mmBtu/mmCF = 0.0075 lb/mmBtu.

Stack testing shall be conducted at the request of the Ohio EPA using Methods 1-5 pursuant to 40 CFR Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1))

1.b Emission Limitation:
Visible particulate emissions shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limits shall be demonstrated by visible emission evaluations performed in accordance with OAC Rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1))

VI. Miscellaneous Requirements

1. This stack emissions unit was installed in January of 1964.

(Authority for term: OAC rule 3745-77-07(C)(1))

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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