



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

**CERTIFIED MAIL**

06/13/07

**RE: Draft Title V Significant Permit  
Modification Chapter 3745-77 permit**

15-76-00-0073  
Canton Drop Forge  
Keith J Houseknecht  
P.O. Box 6902  
Canton, OH 44706-0902

Dear Keith J Houseknecht:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Canton Division of Air Pollution Control within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to the following address:**

**Andrew Hall  
Permit Review/Development Section  
Ohio EPA, Division of Air Pollution Control  
122 South Front Street  
Columbus, Ohio 43215**

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact Canton Division of Air Pollution Control.

Sincerely,

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

cc: USEPA (electronically submitted)  
File, DAPC PIER  
Canton Division of Air Pollution Control  
Pennsylvania  
West Virginia



State of Ohio Environmental Protection Agency

DRAFT TITLE V SIGNIFICANT PERMIT MODIFICATION

Original Effective Date:	Expiration Date:	Modification Effective Date: <i>To be entered upon final issuance</i>
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This document constitutes issuance of a Title V significant permit modification for Facility ID: 15-76-00-0073 to:

Canton Drop Forge  
4575 Southway Street S.W.  
Canton, OH 44706-1995

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

B001 (Boiler No. 1) B&W Sterling Class 131 No. 24 coal fired spreader stoker, maximum heat input 86 MMBtu/hr	P009 (Rotary Furnace FR10) 17 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 21.56 MMBtu/hr	heat input 10 MMBtu/hr P032 (Grit Blaster OB06) Pangborn No. 34 mechanical grit blaster
B002 (Boiler No. 2) B&W Sterling Class 131 No. 24 natural gas and No. 6 fuel oil fired boiler, maximum heat input 88 MMBtu/hr	P010 (Rotary Furnace FR09) 14 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 14.62 MMBtu/hr	P033 (Grinding Area No. 1) Hand grinding of forgings P034 (Grinding Area No. 2) Hand grinding of forgings
B003 (Boiler No. 3) B&W Sterling Class 131 No. 24 natural gas and No. 6 fuel oil fired boiler, maximum heat input 88 MMBtu/hr	P016 (Box Furnace FB11) Natural gas and No. 6 fuel oil fired Canton Drop Forge box furnace, maximum heat input 3.88 MMBtu/hr	P035 (Grinding Area No. 3) Hand grinding of forgings P036 (Shot Blaster OB08) Wheelabrator Super II Tumblast shot cleaner
P001 (Rotary Furnace FR01) 17 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 21.56 MMBtu/hr	P017 (Box Furnace FB08) Natural gas and No. 6 fuel oil fired Canton Drop Forge box furnace, maximum heat input 4.39 MMBtu/hr	P039 (Box Furnace FB14) Natural gas and No. 6 fuel oil fired Canton Drop Forge box furnace, maximum heat input 4.57 MMBtu/hr
P002 (Rotary Furnace FR02) 17 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 21.56 MMBtu/hr	P019 (Box Furnace FB12) Natural gas and No. 6 fuel oil fired Canton Drop Forge box furnace, maximum heat input 3.96 MMBtu/hr	P040 (Heat Treat Furnace OF09) Natural gas fired Hagan pusher type quench and draw furnace, maximum heat input 13 MMBtu/hr
P003 (Rotary Furnace FR03) 17 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 21.88 MMBtu/hr	P020 (Box Furnace FB05) Natural gas and No. 6 fuel oil fired Canton Drop Forge box furnace, maximum heat input 3.88 MMBtu/hr	P041 (Rotary Furnace FR11) 17 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 21.56 MMBtu/hr
P004 (Rotary Furnace FR04) 17 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 21.88 MMBtu/hr	P021 (Box Furnace FB21) Natural gas and No. 6 fuel oil fired Canton Drop Forge box furnace, maximum heat input 7.76 MMBtu/hr	P045 (Shot Blaster OB11) P045 formerly shotblast unit OB09 taken out of service 1/07
P005 (Rotary Furnace FR05) 17 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 21.56 MMBtu/hr	P024 (Heat Treat Furnace OF05) Natural gas fired Hagan pusher type annealing furnace, Model Y6816, maximum heat input 18 MMBtu/hr	P046 (Box Furnace FB06) Natural gas and No. 6 fuel oil fired Canton Drop Forge box furnace, maximum heat input 5.33 MMBtu/hr
P006 (Rotary Furnace FR06) 17 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 21.56 MMBtu/hr	P026 (Heat Treat Furnace OF06) Natural gas fired Hagan pusher type quench and draw furnace, Model Y6819, maximum heat input 16 MMBtu/hr	Z002 (Die Washing) Cleaning of dies using kerosene and steam
P007 (Rotary Furnace FR07) 14 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 15.84 MMBtu/hr	P027 (Heat Treat Furnace OF08) Natural gas fired Hagan pusher type quench and draw furnace, Model Y6818, maximum	

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:

Canton Division of Air Pollution Control  
420 Market Avenue N.  
Canton, OH 44702-1544  
(330) 489-3385

Ohio Environmental Protection Agency

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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)(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 Federally Enforceable 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. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.
2. The permittee shall demonstrate compliance with the sulfur dioxide (SO<sub>2</sub>) National Ambient Air Quality Standard (NAAQS) based on the combined SO<sub>2</sub> emissions from all fuel burning emissions units, as permitted herein, using air dispersion modeling. If attainment with the SO<sub>2</sub> NAAQS cannot be demonstrated, then the permittee may propose an SO<sub>2</sub> emission strategy, which includes, but is not limited to, emission limitations and/or operating restrictions for the use of fuel oil in these emissions units that will sufficiently restrict SO<sub>2</sub> emissions for the purpose of complying with the SO<sub>2</sub> NAAQS. The emission strategy shall be confirmed by air dispersion modeling. The written strategy shall be submitted to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) and Ohio EPA, Central Office for approval along with all support documentation including the basis for the strategy, the emission limitations and/or operating restrictions and the model input information and results within six (6) months of the effective date of this permit. All air dispersion modeling will be conducted using the approved USEPA air dispersion models under a protocol currently approved by the Ohio EPA.
3. The following insignificant emissions units are located at this facility:

F001 - roadways and parking lots;  
P025 - Heat Treat Furnace OF07;  
P043 - Heat Treat Furnace OF10 (PTI 15-201);  
Z001 - Heat Treat Furnace OF11; and  
Z005 - lime silo.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the 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 SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

4. Facility-wide HAP Emission Limitations:

The permittee has requested voluntary emission limitations pursuant to OAC rule 3745-77-07(B)(1) in order to qualify as a synthetic minor source for Hazardous Air Pollutants (HAPs) and avoid the requirements of 40 CFR Part 63, Subpart DDDDD (i.e., the Boiler MACT). Accordingly, this permit establishes the following federally enforceable restrictions:

- a. The emissions of HAPs from all fuel burning emissions units and all other HAP-emitting sources at the facility shall not exceed 9.0 tons per year for any individual HAP, and 24.0 tons per year for total combined HAPs, based on a rolling, 12-month summation of the monthly emissions.
- b. The fuel burning emissions units at this facility include the following: B001, B002, B003, P001 through P007, P009, P010, P016, P017, P019, P020, P021, P024, P026, P027, P039, P040, P041, and P046. HAP emissions for the facility shall also include any de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit.

**A. State and Federally Enforceable Section (continued)**

**5. Facility-Wide Operational Restrictions:**

To ensure enforceability of the HAP emission limits during the first 12 calendar months following issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

TABLE 5-1

Month(s)	Maximum Allowable Cumulative Emissions of Individual HAP (Tons)	Maximum Allowable Cumulative Emissions of Combined HAPs (Tons)
1	2.5	6.5
1-2	2.5	6.5
1-3	2.5	6.5
1-4	5.0	13.0
1-5	5.0	13.0
1-6	5.0	13.0
1-7	7.5	20.0
1-8	7.5	20.0
1-9	7.5	20.0
1-10	9.0	24.0
1-11	9.0	24.0
1-12	9.0	24.0

After the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitations for individual and combined HAPs shall be based upon a rolling, 12-month summation of the monthly emissions.

**6. Facility-Wide Monitoring and Record Keeping Requirements**

a. This permit establishes federally enforceable emission limitations for HAPs as set forth in Section A.5. For the purpose of establishing compliance with the combined HAP emission limitations in Table 5-1, the permittee shall monitor and record facility-wide hydrogen chloride (HCl) emissions. Hydrogen chloride is the predominant individual HAP emission from the fuel burning equipment, therefore total facility-wide HCl emissions shall be presumed to be equal to total facility-wide combined HAP emissions.

b. Emissions of combined HAPs (excluding HCl) from the fuel burning emissions units, and combined HAPs from the de minimus and permanent exemption air contaminant sources are estimated to be less than 1.0 ton per year, therefore no additional monitoring or record keeping is required for combined HAPs (excluding HCl) from the fuel burning emissions units or combined HAPs from the de minimus and permanent exemption air contaminant sources.

c. The permittee shall collect or require the coal supplier to collect weekly representative samples of the coal burned at the facility. The permittee shall perform, or require the supplier to perform, the coal sampling and analyze each weekly representative sample of coal for chlorine content (percent by weight) and heat content (Btu/pound of coal) in accordance with approved ASTM methods. The analytical methods for chlorine content shall be in accordance with the most recent version of SW-846-9250. The permittee shall apply the results of the analyses of the weekly representative sample to the weight of coal received that week to calculate the weighted average for chlorine content and heat content on a monthly basis. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

**A. State and Federally Enforceable Section (continued)**

d. For each shipment of oil received for burning at the facility, the permittee shall maintain records of the total quantity of oil received in gallons, the permittee's or oil supplier's analyses for chlorine content (percent by weight), heat content (Btu/gallon), and density of the oil. The permittee shall perform or require the supplier to perform the analyses for chlorine content, heat content, and density of the oil in accordance with approved ASTM methods. The analytical methods for chlorine content shall be in accordance with the most recent version of SW-846-9250. The permittee shall apply the results of the analyses of each oil shipment to calculate a weighted average for chlorine content, heat content and density on a monthly basis. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

e. The permittee shall maintain monthly records of the following information:

i. The results of each fuel analysis for chlorine and heat contents for coal and chlorine and heat contents and density for oil from A.6.c and A.6.d above.

ii. The HCl emission factor for coal (HCl coal), using the monthly-weighted average chlorine content and heating value from the coal analyses and calculated as follows:

$$\text{HCl coal, lb HCl / mmBTU} = (\text{lb Cl / lb coal}) \times (36 \text{ lb HCl / 35 lb Cl}) / (\text{coal heating value, mmBTU/lb}) \times (1 - \text{CE}/100)$$

where CE is the overall control efficiency for HCl, in percent, for the wet scrubber serving the coal-fired emissions unit B001 (assumed as 87.8 %), or the control efficiency as determined during the most recent emission test that demonstrated the emissions unit was in compliance.

iii. The HCl emission factor for fuel oil (HCl oil), using the monthly-weighted average chlorine content and heating value from the oil analyses and calculated as follows:

$$\text{HCl oil, lb HCl / mmBTU} = (\text{lb Cl / lb oil}) \times (36 \text{ lb HCl / 35 lb Cl}) / (\text{oil heating value, mmBTU/gal})$$

iv. The total monthly amount of each fuel burned (coal and fuel oil) in all fuel burning emissions units, in tons per month for coal, and in gallons per month for oil.

v. The monthly HCl emissions from coal = (coal used, lbs/month) x (weighted average heat content, mmBtu / lb) x (HCl coal, from (ii)) x 1 ton HCl / 2000 lb HCl.

vi. The monthly HCl emissions from fuel oil = (oil used, gallons/month) x (weighted average heat content, mmBtu / gallon) x HCl oil, from (iii) x 1 ton HCl / 2000 lb HCl.

vii. The total HCl emissions from all fuels burned (coal and fuel oil), in tons / month calculated as the sum of (v) plus (vi).

viii. For the first 12 calendar months following the issuance of this permit, the cumulative year-to-date total HCl emissions, in tons from all fuels burned (coal and fuel oil).

ix. Beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of total HCl emissions from all fuels burned (coal and fuel oil).

**A. State and Federally Enforceable Section (continued)**

**7. Reporting Requirements**

a. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

i. For the first 12 calendar months following the issuance of this permit, all exceedances of the monthly emission limitations of individual and combined HAP (as HCl) specified in Section A.5.

ii. After the first 12 calendar months following the issuance of this permit, all exceedances of the rolling, 12-month emission limitations of individual and combined HAP (as HCl) specified in Section A.5.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

b. The permittee shall submit annual reports that summarize the actual facility-wide total individual and combined HAP emissions from all HAP-emitting sources at the facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

c. The permittee shall also submit annual reports that list any de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**8. Testing Requirements**

Compliance with the facility-wide HAP emission limitations in Section A.4 of these terms and conditions shall be determined based on the record keeping requirements specified in Section A.6.

If required, the assumed control efficiency (87.8%) for HCl of the wet scrubber serving the coal-fired boiler (B001) shall be demonstrated through emission testing in accordance with Method 26A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

## **B. State Only Enforceable Section**

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

Z003 - coal handling;  
Z004 - ash handling;  
Z006 - Tank No. 6;  
Z007 - Tank No. 7;  
Z008 - Tank No. 8;  
Z009 - Tank No. 9;  
Z010 - oil quenching;  
Z011 - die polishing;  
Z012 - Parts Washer No. 1;  
Z013 - Parts Washer No. 2;  
Z014 - Hammer Location A;  
Z015 - Hammer Location B;  
Z016 - Hammer Location C;  
Z017 - Hammer Location D;  
Z018 - Hammer Location E;  
Z019 - Hammer Location F;  
Z020 - Hammer Location G;  
Z021 - Hammer Location H;  
Z022 - Hammer Location I;  
Z023 - Hammer Location J;  
Z024 - Hammer Location K;  
Z025 - Hammer Location L;  
Z026 - Hammer Location M; and  
Z027 - Tank No. 18.

2. The permittee shall maintain monthly records of the amount (in gallons) of cylinder oil employed in emissions units Z014 through Z026.
3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the process steam exhaust stack serving emissions units Z014 through Z026. 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 location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the visible emission check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

**B. State Only Enforceable Section (continued)**

4. The permittee shall submit quarterly written reports that identify the following:
  - a. the amount (in gallons) of cylinder oil employed in emissions units Z014 through Z026 during each calendar month;
  - b. an identification of all days during which any visible particulate emissions were observed from the stack serving emissions units Z014 through Z026; and
  - c. a description of any corrective actions taken to minimize or eliminate the visible particulate emissions.

The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous 3-month period.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Boiler No. 1 (B001)

**Activity Description:** B&W Sterling Class 131 No. 24 coal fired spreader stoker, maximum heat input 86 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B&W Sterling Class 131 No. 24 coal-fired spreader stoker boiler, maximum heat input of 86 mmBtu/hr, controlled by a venturi wet scrubber (OP01) with a limestone injection system to control sulfur dioxide emissions - Boiler No. 1	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-10(C)(1)	0.150 pound of particulate emissions per mmBtu of actual heat input
	OAC rule 3745-18-82(B)(1)	5.0 pounds of SO <sub>2</sub> per mmBtu actual heat input. (See A.II.1.d below).
	OAC rule 3745-18-82(B)(2)	See A.I.2.a below.

##### 2. Additional Terms and Conditions

- 2.a The stack height for this emissions unit shall be a minimum of 147.5 feet.

##### II. Operational Restrictions

1. The quality of the coal burned in this emissions unit shall meet the following specifications, on a dry basis:
  - a. the coal shall have an ash content of less than 16%;
  - b. the coal shall have a sulfur content which is sufficient to comply with the allowable SO<sub>2</sub> emission limitation of 5.0 pounds of SO<sub>2</sub> per mmBtu of actual heat input;
  - c. the coal shall have a heat content of no less than 11,000 Btu per pound of coal; and
  - d. OAC rule 3745-18-82(B)(1) further requires that the permittee shall limit the maximum heat input rate of this emissions unit not to exceed a maximum of 86 mmBtu/hour as a 3-hour average and 62.5 mmBtu/hour as a 24-hour average.

## II. Operational Restrictions (continued)

2. The permittee shall operate the venturi wet scrubber in accordance with the following parameters:
  - a. the pressure drop range across the scrubber shall be continuously maintained at a value of not less than 8 inches of water, at all times while the emissions unit is in operation;
  - b. the fresh water nozzle flow rate shall be continuously maintained at a value of not less than 30 gallons per minute, at all times while the emissions unit is in operation; and
  - c. the scrubber water supply pressure shall be continuously maintained at a value of not less than 38 pounds per square inch guage (psig), at all times while the emissions unit is in operation.

After each test required in section A.V.2, the permittee may petition the CCHD, APCD to reestablish the above operating parameters provided the permittee can demonstrate to the satisfaction of the CCHD, APCD that the operating conditions upon which the parameters were previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect or require the coal supplier to collect weekly a representative sample of coal burned in this emissions unit. The permittee shall perform, or require the supplier to perform, the coal sampling and analyze each weekly representative sample of coal for ash content (percent by weight), sulfur content (percent by weight), and heat content (Btu/pound of coal) in accordance with either 40 CFR Part 60, Appendix A, Method 19 or the proper ASTM methods. The permittee shall apply these analyses of the weekly representative samples to the weights of coal received that week and calculate a weighted average for these parameters on a monthly basis. Alternative, equivalent methods may be used upon written approval from the CCHD, APCD.
2. The permittee shall maintain monthly records of the following information:
  - a. total amount (in tons) of coal received;
  - b. the results of the analyses for sulfur content (in percent, by weight), heat content (in Btu/pound of coal), and ash content (in percent, by weight); and
  - c. the calculated, controlled SO<sub>2</sub> emission rate (in pound(s)/mmBtu) based upon a weighted average of the calculated SO<sub>2</sub> emission rates for all shipments of coal during a calendar month and the SO<sub>2</sub> reduction (control) efficiency measured and recorded from the most recent emission tests, performed in accordance with the methods and procedures specified in section A.V, that demonstrated compliance with the SO<sub>2</sub> emission limitation specified in section A.I.
3. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the scrubber, the scrubber fresh water nozzle flow rate, and the scrubber water supply pressure 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 while the emissions unit is in operation:

- a. the pressure drop across the scrubber, in inches of water, on a twice per shift basis;
- b. the scrubber fresh water nozzle flow rate, in gallons per minute, on a twice per shift basis;
- c. the scrubber water supply pressure, in psig, on a twice per shift basis; and
- d. the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

All readings shall be taken twice per shift with at least 2 hours between readings.

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

4. The permittee shall perform weekly visible particulate emissions checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit when "fire cleaning" (i.e., removing the ash from the grate) is performed.

The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall perform visible emissions observations in accordance with 40 CFR Part 60, Appendix A, Method 9 for a minimum of 30 minutes. The permittee shall also document any corrective actions taken to minimize or eliminate the visible particulate emissions in the operations log.

For the emission point for which the weekly checks show emissions that are representative of normal operation for 24 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly (once per calendar month, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to weekly for that emission point until such time as there are 24 consecutive operating weeks of normal visible emissions.

5. The permittee shall operate and maintain a continuous steam flow rate monitoring device and recorder which measures and records the steam flow rate from this emissions unit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The steam flow rate monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall maintain all records describing any maintenance conducted on the steam flow rate monitoring and recording devices.
6. The permittee shall maintain daily records of the hourly average heat input for this emissions unit. (The monthly weighted heat content for the coal, from Section A.III.2, may be used to back calculate the hourly average heat input.)

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the coal ash content limitation specified in section A.II.1;
  - b. all exceedances of the coal heat content limitation specified in section A.II.1;
  - c. all exceedances of the SO<sub>2</sub> emission limitation specified in section A.I.1;
  - d. all periods of time during which the pressure drop across the scrubber was not maintained at or above the level specified in section A.II.2;
  - e. all periods of time during which the scrubber fresh water nozzle flow rate was not maintained at or above the level specified in section A.II.2;
  - f. all periods of time during which the scrubber water supply pressure was not maintained at or above the level specified in section A.II.2; and
  - g. all exceedances of the 3-hour or 24-hour average maximum heat input rate restrictions for this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall submit semiannual written reports that (a) identify all times during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) provide copies of any Method 9 observations performed when visible particulate emissions were observed, and (c) describe any corrective actions taken to minimize or eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

#### **IV. Reporting Requirements (continued)**

- 3.** All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

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

- 1.a** Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 1.b** Emission Limitation:

0.150 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing required pursuant to section A.V.2.

- 1.c** Emission Limitation:

5.0 pounds of SO<sub>2</sub> per mmBtu of actual heat input

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated based upon the records required pursuant to section A.III and the emission testing required pursuant to section A.V.2.

- 1.d** Operational Restriction:

Maximum heat input not to exceed 86 mmBtu/hr as a 3-hr average, and 62.5 mmBtu/hr as a 24-hr average

Applicable Compliance Method:

Compliance with this operating restriction shall be demonstrated based on the records required pursuant to section A.III.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable visible particulate emission limitation, the particulate mass emission limitation, and the SO<sub>2</sub> mass emission limitation.
  - c. The following parameters also shall be monitored and recorded, on a 15-minute basis, during the emission testing: the pressure drop across the scrubber, the scrubber fresh water nozzle flow rate, and the scrubber water supply pressure.
  - d. The following test methods shall be employed to demonstrate compliance with the allowable emission limitations:
    - i. for the visible particulate emission limitations, Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1);
    - ii. for the particulate mass emission limitation, Methods 1 through 5 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(9); and
    - iii. for the SO<sub>2</sub> mass emission limitation, Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A.
  - e. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.
  - f. The permittee shall conduct two (2) sampling runs during "fire cleaning" episodes and two (2) sampling runs during normal boiler operation.
  - g. The permittee shall not conduct any maintenance, other than for routine maintenance, to maintain boiler operation or for safety purposes on the emissions unit, the scrubber system, or any of its appurtenances for a period of three (3) months prior to the test.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CCHD, APCD. 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 CCHD, APCD's refusal to accept the results of the emission test(s).

Personnel from the CCHD, APCD 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the CCHD, APCD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the CCHD, APCD.

## VI. Miscellaneous Requirements

1. The permittee shall comply with the procedures specified in the document entitled "Powerhouse Preventative Maintenance Plan for Boiler #1" as submitted to the CCHD, APCD on May 5, 2003. The plan may be modified as long as the CCHD, APCD has provided written approval of the proposed changes.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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 No. 2 (B002)

**Activity Description:** B&W Sterling Class 131 No. 24 natural gas and No. 6 fuel oil fired boiler, maximum heat input 88 MMBtu/hr

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B&W Sterling Class 131 No. 24 natural gas and fuel oil (No. 6 or better) fired boiler, maximum heat input of 88 mmBtu per hour - Boiler No. 2	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-10(C)(1)	0.150 pound of particulate emissions per mmBtu actual heat input
	OAC rule 3745-18-82(B)(3)	2.5 pounds of SO <sub>2</sub> per mmBtu actual heat input

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The permittee shall burn only natural gas and fuel oil (No. 6 or better) in this emissions unit.
- The quality of the oil burned in this emissions unit shall have a combination of heat and sulfur content which is sufficient to comply with the allowable SO<sub>2</sub> emission limitation.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any stack 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. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content, heat content, and density of the oil, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, equivalent methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

3. For each day during which the permittee burns a fuel other than natural gas and/or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

### IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days when this emissions unit was burning fuel oil (No. 4, 5, and/or 6) and any visible particulate emissions were observed from any stacks serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the CCHD, APCD by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall notify the CCHD, APCD in writing of any record which shows a deviation of the allowable SO<sub>2</sub> emission limitation based upon the calculated sulfur dioxide emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 45 days after the deviation occurs.
3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

### V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

**1.b** Emission Limitation:

0.150 pound of particulate emissions per mmBtu actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing requirements specified in section A.V.2.

**1.c** Emission Limitation:

2.5 pounds of SO<sub>2</sub> per mmBtu actual heat input

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated based upon the records required pursuant to section A.III and the emission testing required pursuant to section A.V.2.

**2.** The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 45 days after fuel oil is burned in this emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable visible particulate emission limitations, the particulate mass emission limitation, and the SO<sub>2</sub> mass emission limitation.
- c. The following test methods shall be employed to demonstrate compliance with the allowable emission limitations:
  - i. for the visible particulate emission limitations, Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1);
  - ii. for the particulate mass emission limitation, Methods 1 through 5 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(9); and
  - iii. for the SO<sub>2</sub> mass emission limitation, Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A.
- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.
- e. The tests shall be performed with the emissions unit burning the worst-case fuel oil at the time of the test.

## **V. Testing Requirements (continued)**

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CCHD, APCD. 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 CCHD, APCD's refusal to accept the results of the emission test(s).

Personnel from the CCHD, APCD 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the CCHD, APCD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the CCHD, APCD.

## **VI. Miscellaneous Requirements**

1. The permittee may burn fuel oil in this emissions unit for no more than 2 days during any calendar year for the purpose of establishing operational readiness of the emissions unit without triggering the emission test required in section A.V.2. During this 2-day period, the permittee shall maintain compliance with all of the emission limitations specified in section A.I.1 and all terms and conditions of this permit.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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 No. 3 (B003)

**Activity Description:** B&W Sterling Class 131 No. 24 natural gas and No. 6 fuel oil fired boiler, maximum heat input 88 MMBtu/hr

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B&W Sterling Class 131 No. 24 natural gas and fuel oil (No. 6 or better) fired boiler, maximum heat input of 88 mmBtu per hour - Boiler No. 3	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-10(C)(1)	0.150 pound of particulate emissions per mmBtu actual heat input
	OAC rule 3745-18-82(B)(3)	2.5 pounds of SO <sub>2</sub> per mmBtu actual heat input

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The permittee shall burn only natural gas and fuel oil (No. 6 or better) in this emissions unit.
- The quality of the oil burned in this emissions unit shall have a combination of heat and sulfur content which is sufficient to comply with the allowable SO<sub>2</sub> emission limitation.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any stack 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. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content, heat content, and density of the oil, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, equivalent methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

3. For each day during which the permittee burns a fuel other than natural gas and/or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

### IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days when this emissions unit was burning fuel oil (No. 4, 5, and/or 6) and any visible particulate emissions were observed from any stacks serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the CCHD, APCD by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall notify the CCHD, APCD in writing of any record which shows a deviation of the allowable SO<sub>2</sub> emission limitation based upon the calculated sulfur dioxide emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 45 days after the deviation occurs.
3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

### V. Testing Requirements

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

## V. Testing Requirements (continued)

### 1.a Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

### 1.b Emission Limitation:

0.150 pound of particulate emissions per mmBtu actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing requirements specified in section A.V.2.

### 1.c Emission Limitation:

2.5 pounds of SO<sub>2</sub> per mmBtu actual heat input

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated based upon the records required pursuant to section A.III and the emission testing required pursuant to section A.V.2.

## 2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 45 days after fuel oil is burned in this emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable visible particulate emission limitations, the particulate mass emission limitation, and the SO<sub>2</sub> mass emission limitation.
- c. The following test methods shall be employed to demonstrate compliance with the allowable emission limitations:
  - i. for the visible particulate emission limitations, Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1);
  - ii. for the particulate mass emission limitation, Methods 1 through 5 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(9); and
  - iii. for the SO<sub>2</sub> mass emission limitation, Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A.
- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.
- e. The tests shall be performed with the emissions unit burning the worst-case fuel oil at the time of the test.

## **V. Testing Requirements (continued)**

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CCHD, APCD. 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 CCHD, APCD's refusal to accept the results of the emission test(s).

Personnel from the CCHD, APCD 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the CCHD, APCD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the CCHD, APCD.

## **VI. Miscellaneous Requirements**

1. The permittee may burn fuel oil in this emissions unit for no more than 2 days during any calendar year for the purpose of establishing operational readiness of the emissions unit without triggering the emission test required in section A.V.2. During this 2-day period, the permittee shall maintain compliance with all of the emission limitations specified in section A.I.1 and all terms and conditions of this permit.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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 Furnace FR01 (P001)

**Activity Description:** 17 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 21.56 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 21.56 mmBtu per hour - Furnace FR01 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-82(B)(4)	See A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

##### II. Operational Restrictions

1. The permittee shall burn only natural gas and fuel oil (No. 6 or better) as fuel in this emissions unit.
2. Pursuant to OAC rule 3745-18-82(B)(4):
  - a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.
  - b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each day during which the permittee burns a fuel other than natural gas or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

### IV. Reporting Requirements

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **IV. Reporting Requirements (continued)**

- 3.** The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:
  - a. The facility-wide forge-shop furnace fuel oil burning rates.
  - b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
- 4.** All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

- 1.** Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a** Emission Limitation:  
  
20% opacity as a 3-minute average for visible fugitive particulate emissions  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).  
  
For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
  - 1.b** Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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 Furnace FR02 (P002)

**Activity Description:** 17 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 21.56 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 21.56 mmBtu per hour - Furnace FR02 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-82(B)(4)	See A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

##### II. Operational Restrictions

1. The permittee shall burn only natural gas and fuel oil (No. 6 or better) as fuel in this emissions unit.
2. Pursuant to OAC rule 3745-18-82(B)(4):
  - a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.
  - b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each day during which the permittee burns a fuel other than natural gas or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

### IV. Reporting Requirements

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **IV. Reporting Requirements (continued)**

- 3.** The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:
  - a. The facility-wide forge-shop furnace fuel oil burning rates.
  - b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
- 4.** All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

- 1.** Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a** Emission Limitation:  
  
20% opacity as a 3-minute average for visible fugitive particulate emissions  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).  
  
For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
  - 1.b** Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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 Furnace FR03 (P003)

**Activity Description:** 17 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 21.88 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 21.88 mmBtu per hour - Furnace FR03 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-82(B)(4)	See A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

##### II. Operational Restrictions

1. The permittee shall burn only natural gas and fuel oil (No. 6 or better) as fuel in this emissions unit.
2. Pursuant to OAC rule 3745-18-82(B)(4):
  - a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.
  - b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each day during which the permittee burns a fuel other than natural gas or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

### IV. Reporting Requirements

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **IV. Reporting Requirements (continued)**

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:
  - a. The facility-wide forge-shop furnace fuel oil burning rates.
  - b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

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

- 1.a Emission Limitation:

20% opacity as a 3-minute average for visible fugitive particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

- 1.b Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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 Furnace FR04 (P004)

**Activity Description:** 17 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 21.88 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 21.88 mmBtu per hour - Furnace FR04 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-82(B)(4)	See A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

##### II. Operational Restrictions

1. The permittee shall burn only natural gas and fuel oil (No. 6 or better) as fuel in this emissions unit.
2. Pursuant to OAC rule 3745-18-82(B)(4):
  - a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.
  - b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each day during which the permittee burns a fuel other than natural gas or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

### IV. Reporting Requirements

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **IV. Reporting Requirements (continued)**

- 3.** The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:
  - a. The facility-wide forge-shop furnace fuel oil burning rates.
  - b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
- 4.** All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

- 1.** Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a** Emission Limitation:  
  
20% opacity as a 3-minute average for visible fugitive particulate emissions  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).  
  
For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
  - 1.b** Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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 Furnace FR05 (P005)

**Activity Description:** 17 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 21.56 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 21.56 mmBtu per hour - Furnace FR05 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-82(B)(4)	See A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

##### II. Operational Restrictions

1. The permittee shall burn only natural gas and fuel oil (No. 6 or better) as fuel in this emissions unit.
2. Pursuant to OAC rule 3745-18-82(B)(4):
  - a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.
  - b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each day during which the permittee burns a fuel other than natural gas or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

### IV. Reporting Requirements

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **IV. Reporting Requirements (continued)**

- 3.** The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:
  - a. The facility-wide forge-shop furnace fuel oil burning rates.
  - b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
- 4.** All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

- 1.** Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a** Emission Limitation:  
  
20% opacity as a 3-minute average for visible fugitive particulate emissions  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).  
  
For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
  - 1.b** Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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 Furnace FR06 (P006)

**Activity Description:** 17 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 21.56 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 21.56 mmBtu per hour - Furnace FR06 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-82(B)(4)	See A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

##### II. Operational Restrictions

1. The permittee shall burn only natural gas and fuel oil (No. 6 or better) as fuel in this emissions unit.
2. Pursuant to OAC rule 3745-18-82(B)(4):
  - a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.
  - b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each day during which the permittee burns a fuel other than natural gas or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

### IV. Reporting Requirements

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **IV. Reporting Requirements (continued)**

- 3.** The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:
  - a. The facility-wide forge-shop furnace fuel oil burning rates.
  - b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
- 4.** All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

- 1.** Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a** Emission Limitation:  
  
20% opacity as a 3-minute average for visible fugitive particulate emissions  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).  
  
For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
  - 1.b** Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

#### **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.

<b><u>Operations, Property, and/or Equipment</u></b>	<b><u>Applicable Rules/ Requirements</u></b>	<b><u>Applicable Emissions Limitations/Control Measures</u></b>
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**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 Furnace FR07 (P007)

**Activity Description:** 14 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 15.84 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 15.84 mmBtu per hour - Furnace FR07 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-82(B)(4)	See A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

##### II. Operational Restrictions

1. The permittee shall burn only natural gas and fuel oil (No. 6 or better) as fuel in this emissions unit.
2. Pursuant to OAC rule 3745-18-82(B)(4):
  - a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.
  - b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each day during which the permittee burns a fuel other than natural gas or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

### IV. Reporting Requirements

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **IV. Reporting Requirements (continued)**

- 3.** The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:
  - a. The facility-wide forge-shop furnace fuel oil burning rates.
  - b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
- 4.** All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

- 1.** Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a** Emission Limitation:  
  
20% opacity as a 3-minute average for visible fugitive particulate emissions  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).  
  
For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
  - 1.b** Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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 Furnace FR10 (P009)

**Activity Description:** 17 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 21.56 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 21.56 mmBtu per hour - Furnace FR10 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-82(B)(4)	See A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

##### II. Operational Restrictions

1. The permittee shall burn only natural gas and fuel oil (No. 6 or better) as fuel in this emissions unit.
2. Pursuant to OAC rule 3745-18-82(B)(4):
  - a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.
  - b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each day during which the permittee burns a fuel other than natural gas or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

### IV. Reporting Requirements

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **IV. Reporting Requirements (continued)**

- 3.** The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:
  - a. The facility-wide forge-shop furnace fuel oil burning rates.
  - b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
- 4.** All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

- 1.** Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a** Emission Limitation:  
  
20% opacity as a 3-minute average for visible fugitive particulate emissions  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).  
  
For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
  - 1.b** Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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 Furnace FR09 (P010)

**Activity Description:** 14 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 14.62 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 14.62 mmBtu per hour - Furnace FR09 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-82(B)(4)	See A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

##### II. Operational Restrictions

1. The permittee shall burn only natural gas and fuel oil (No. 6 or better) as fuel in this emissions unit.
2. Pursuant to OAC rule 3745-18-82(B)(4):
  - a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.
  - b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each day during which the permittee burns a fuel other than natural gas or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

### IV. Reporting Requirements

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **IV. Reporting Requirements (continued)**

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:
  - a. The facility-wide forge-shop furnace fuel oil burning rates.
  - b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:  
  
20% opacity as a 3-minute average for visible fugitive particulate emissions  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).  
  
For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
  - 1.b Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Box Furnace FB11 (P016)

**Activity Description:** Natural gas and No. 6 fuel oil fired Canton Drop Forge box furnace, maximum heat input 3.88 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas and fuel oil (No. 6 or better) fired Canton Drop Forge box furnace, with a maximum heat input of 3.88 mmBtu per hour - Furnace FB11 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-82(B)(4)	See A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

##### II. Operational Restrictions

1. The permittee shall burn only natural gas and fuel oil (No. 6 or better) as fuel in this emissions unit.
2. Pursuant to OAC rule 3745-18-82(B)(4):
  - a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.
  - b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each day during which the permittee burns a fuel other than natural gas or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

### IV. Reporting Requirements

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **IV. Reporting Requirements (continued)**

The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:

- a. The facility-wide forge-shop furnace fuel oil burning rates.
- b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

#### **V. Testing Requirements**

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

- 1.a Emission Limitation:

20% opacity as a 3-minute average for visible fugitive particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

- 1.b Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Box Furnace FB08 (P017)

**Activity Description:** Natural gas and No. 6 fuel oil fired Canton Drop Forge box furnace, maximum heat input 4.39 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas and fuel oil (No. 6 or better) fired Canton Drop Forge box furnace, with a maximum heat input of 4.39 mmBtu per hour - Furnace FB08 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-82(B)(4)	See A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

##### II. Operational Restrictions

1. The permittee shall burn only natural gas and fuel oil (No. 6 or better) as fuel in this emissions unit.
2. Pursuant to OAC rule 3745-18-82(B)(4):
  - a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.
  - b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each day during which the permittee burns a fuel other than natural gas or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

### IV. Reporting Requirements

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **IV. Reporting Requirements (continued)**

- 3.** The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:
  - a. The facility-wide forge-shop furnace fuel oil burning rates.
  - b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
- 4.** All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

- 1.** Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a** Emission Limitation:  
  
20% opacity as a 3-minute average for visible fugitive particulate emissions  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).  
  
For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
  - 1.b** Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Box Furnace FB12 (P019)

**Activity Description:** Natural gas and No. 6 fuel oil fired Canton Drop Forge box furnace, maximum heat input 3.96 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas and fuel oil (No. 6 or better) fired Canton Drop Forge box furnace, with a maximum heat input of 3.96 mmBtu per hour - Furnace FB12 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-82(B)(4)	See A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

##### II. Operational Restrictions

1. The permittee shall burn only natural gas and fuel oil (No. 6 or better) as fuel in this emissions unit.
2. Pursuant to OAC rule 3745-18-82(B)(4):
  - a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.
  - b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each day during which the permittee burns a fuel other than natural gas or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

### IV. Reporting Requirements

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **IV. Reporting Requirements (continued)**

- 3.** The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:
  - a. The facility-wide forge-shop furnace fuel oil burning rates.
  - b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
- 4.** All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

- 1.** Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a** Emission Limitation:  
  
20% opacity as a 3-minute average for visible fugitive particulate emissions  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).  
  
For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
  - 1.b** Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Box Furnace FB05 (P020)

**Activity Description:** Natural gas and No. 6 fuel oil fired Canton Drop Forge box furnace, maximum heat input 3.88 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas and fuel oil (No. 6 or better) fired Canton Drop Forge box furnace, with a maximum heat input of 3.88 mmBtu per hour - Furnace FB05 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-82(B)(4)	See A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

##### II. Operational Restrictions

1. The permittee shall burn only natural gas and fuel oil (No. 6 or better) as fuel in this emissions unit.
2. Pursuant to OAC rule 3745-18-82(B)(4):
  - a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.
  - b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each day during which the permittee burns a fuel other than natural gas or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

### IV. Reporting Requirements

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **IV. Reporting Requirements (continued)**

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:
  - a. The facility-wide forge-shop furnace fuel oil burning rates.
  - b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:  
  
20% opacity as a 3-minute average for visible fugitive particulate emissions  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).  
  
For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
  - 1.b Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Box Furnace FB21 (P021)

**Activity Description:** Natural gas and No. 6 fuel oil fired Canton Drop Forge box furnace, maximum heat input 7.76 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas and fuel oil (No. 6 or better) fired Canton Drop Forge box furnace, with a maximum heat input of 7.76 mmBtu per hour - Furnace FB21 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-82(B)(4)	See A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

##### II. Operational Restrictions

1. The permittee shall burn only natural gas and fuel oil (No. 6 or better) as fuel in this emissions unit.
2. Pursuant to OAC rule 3745-18-82(B)(4):
  - a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.
  - b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each day during which the permittee burns a fuel other than natural gas or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

### IV. Reporting Requirements

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **IV. Reporting Requirements (continued)**

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:
  - a. The facility-wide forge-shop furnace fuel oil burning rates.
  - b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:  
  
20% opacity as a 3-minute average for visible fugitive particulate emissions  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).  
  
For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
  - 1.b Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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 OF05 (P024)

**Activity Description:** Natural gas fired Hagan pusher type annealing furnace, Model Y6816, maximum heat input 18 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired Hagan pusher type annealing furnace, Model Y6816, with a maximum heat input of 18 mmBtu per hour - Furnace OF05 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.
- 2.c Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 31.8 pounds per hour.

##### II. Operational Restrictions

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

##### 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 maintain a record of the type and quantity of fuel burned in this emissions unit.

##### 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.
2. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

1.a Emission Limitation:

20% opacity as a 3-minute average for visible fugitive particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

1.b Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 31.8 pounds per hour.

Applicable Compliance Method:

The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials (steel billets) employed in this emissions unit do not generate SO<sub>2</sub> emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

## 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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 OF06 (P026)

**Activity Description:** Natural gas fired Hagan pusher type quench and draw furnace, Model Y6819, maximum heat input 16 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired Hagan pusher type annealing furnace, Model Y6819, with a maximum heat input of 16 mmBtu per hour - Furnace OF06 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.
- 2.c Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 31.3 pounds per hour.

##### II. Operational Restrictions

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

##### 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 maintain a record of the type and quantity of fuel burned in this emissions unit.

##### 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.
2. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

1.a Emission Limitation:

20% opacity as a 3-minute average for visible fugitive particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

1.b Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 31.3 pounds per hour.

Applicable Compliance Method:

The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials (steel billets) employed in this emissions unit do not generate SO<sub>2</sub> emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

## 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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 OF08 (P027)

**Activity Description:** Natural gas fired Hagan pusher type quench and draw furnace, Model Y6818, maximum heat input 10 MMBtu/hr

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired Hagan pusher type annealing furnace, Model Y6818, with a maximum heat input of 10 mmBtu per hour - Furnace OF08 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.
- Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 20.7 pounds per hour.

##### II. Operational Restrictions

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

##### III. Monitoring and/or Record Keeping Requirements

- 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.

##### IV. Reporting Requirements

- 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.
- All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

1.a Emission Limitation:

20% opacity as a 3-minute average for visible fugitive particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

1.b Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 20.7 pounds per hour.

Applicable Compliance Method:

The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials (steel billets) employed in this emissions unit do not generate SO<sub>2</sub> emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

## 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Grit Blaster OB06 (P032)  
**Activity Description:** Pangborn No. 34 mechanical grit blaster

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pangborn No. 34 mechanical grit blaster with a maximum process weight rate of 2.5 tons per hour controlled by a baghouse (GB1) - Grit Blaster OB06	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B), Figure II	19.5 pounds per hour of particulate emissions, as a combined limitation for emissions units P032 and P036  See A.I.2.a below.

##### 2. Additional Terms and Conditions

- 2.a Emissions units P032 and P036 are similar emissions units; therefore, the total uncontrolled mass rate of emissions (UMRE) from all of the units shall be used to determine the combined allowable emission limitation from Figure II of OAC rule 3745-17-11. The UMRE was calculated using an emission factor found in a document entitled "An Inventory of Iron Foundry Emissions" by Bernard S. Gutow, dated January, 1972. The document provided an emission factor for shot blasting operations of 15.5 pounds of particulates per ton of metal (uncontrolled). Multiplying this factor by the maximum process weight rate for each emissions unit gives a total UMRE of 232.5 pounds per hour of particulates. Using Figure II, the combined allowable emission rate is determined from curve P1 and the equation:  $A = 0.5782(U)^{0.6456}$ , where "U" is the UMRE.

##### II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water, while the emissions unit is in operation.

The permittee may petition the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) to reestablish the pressure drop range provided the permittee can demonstrate to the satisfaction of the CCHD, APCD that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

2. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

### V. Testing Requirements

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

- 1.a Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 1.b Emission Limitation:

19.5 pounds per hour of particulate emissions, as a combined limitation for emissions units P032 and P036

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

The tests shall be conducted while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD. The results from the emission tests for emissions units P032 and P036 shall be summed to determine compliance with the combined particulate emission limitation.

### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Grinding Area No. 1 (P033)  
**Activity Description:** Hand grinding of forgings

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
hand grindings of forgings with a maximum process weight rate of 2.38 tons per hour controlled by a baghouse (GRND) - Grinding Area No. 1	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)	Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).
	OAC rule 3745-17-11(B)	See A.I.2.a below. 7.33 pounds per hour of particulate emissions  See A.I.2.b below.

##### 2. Additional Terms and Conditions

- 2.a The permittee shall use a three-sided booth enclosure with the particulate emissions directed towards the ventilation duct to minimize or eliminate visible fugitive particulate emissions from this emissions unit.

The collection efficiency of the booth ventilation system shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

- 2.b The permittee shall comply with the more restrictive requirement of either Table 1 or Figure II of OAC rule 3745-17-11. Based on calculations using an emission factor of 1.6 pounds of particulate emissions per ton for grinding operations found in a document entitled "An Inventory of Iron Foundry Emissions" by Bernard S. Gutow, dated January, 1972, Figure II does not apply because the uncontrolled mass rate of emissions (UMRE) was determined to be less than 10 pounds per hour. Therefore, the allowable particulate emission limitation was determined from Table 1, based on the maximum process weight rate of the emissions unit.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water, while the emissions unit is in operation.

The permittee may petition the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) to reestablish the pressure drop range provided the permittee can demonstrate to the satisfaction of the CCHD, APCD that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform weekly checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g. windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

## IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

## **V. Testing Requirements (continued)**

### **1.a** Emission Limitation:

20% opacity as a 6-minute average, for stack emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible particulate emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

### **1.b** Emission Limitation:

20% opacity as a 3-minute average, for fugitive emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

### **1.c** Emission Limitation:

7.33 pounds per hour of particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC Rule 3745-17-03(B)(10).

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD. The following parameters also shall be monitored and recorded during the emissions testing: the pressure drop across the baghouse and the process weight rate, in tons.

## **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Grinding Area No. 2 (P034)  
**Activity Description:** Hand grinding of forgings

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
hand grindings of forgings with a maximum process weight rate of 2.38 tons per hour controlled by a baghouse (GRND) - Grinding Area No. 2	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)	Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).
	OAC rule 3745-17-11(B)	See A.I.2.a below. 7.33 pounds per hour of particulate emissions  See A.I.2.b below.

##### 2. Additional Terms and Conditions

- 2.a The permittee shall use a three-sided booth enclosure with the particulate emissions directed towards the ventilation duct to minimize or eliminate visible fugitive particulate emissions from this emissions unit.

The collection efficiency of the booth ventilation system shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

- 2.b The permittee shall comply with the more restrictive requirement of either Table 1 or Figure II of OAC rule 3745-17-11. Based on calculations using an emission factor of 1.6 pounds of particulate emissions per ton for grinding operations found in a document entitled "An Inventory of Iron Foundry Emissions" by Bernard S. Gutow, dated January, 1972, Figure II does not apply because the uncontrolled mass rate of emissions (UMRE) was determined to be less than 10 pounds per hour. Therefore, the allowable particulate emission limitation was determined from Table 1, based on the maximum process weight rate of the emissions unit.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water, while the emissions unit is in operation.

The permittee may petition the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) to reestablish the pressure drop range provided the permittee can demonstrate to the satisfaction of the CCHD, APCD that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform weekly checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g. windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

## IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

## **V. Testing Requirements (continued)**

### **1.a** Emission Limitation:

20% opacity as a 6-minute average, for stack emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible particulate emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

### **1.b** Emission Limitation:

20% opacity as a 3-minute average, for fugitive emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

### **1.c** Emission Limitation:

7.33 pounds per hour of particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC Rule 3745-17-03(B)(10).

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD. The following parameters also shall be monitored and recorded during the emissions testing: the pressure drop across the baghouse and the process weight rate, in tons.

## **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Grinding Area No. 3 (P035)  
**Activity Description:** Hand grinding of forgings

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
hand grindings of forgings with a maximum process weight rate of 2.38 tons per hour controlled by a baghouse (GRND) - Grinding Area No. 3	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)	Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).
	OAC rule 3745-17-11(B)	See A.I.2.a below. 7.33 pounds per hour of particulate emissions  See A.I.2.b below.

##### 2. Additional Terms and Conditions

- 2.a The permittee shall use a three-sided booth enclosure with the particulate emissions directed towards the ventilation duct to minimize or eliminate visible fugitive particulate emissions from this emissions unit.

The collection efficiency of the booth ventilation system shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

- 2.b The permittee shall comply with the more restrictive requirement of either Table 1 or Figure II of OAC rule 3745-17-11. Based on calculations using an emission factor of 1.6 pounds of particulate emissions per ton for grinding operations found in a document entitled "An Inventory of Iron Foundry Emissions" by Bernard S. Gutow, dated January, 1972, Figure II does not apply because the uncontrolled mass rate of emissions (UMRE) was determined to be less than 10 pounds per hour. Therefore, the allowable particulate emission limitation was determined from Table 1, based on the maximum process weight rate of the emissions unit.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water, while the emissions unit is in operation.

The permittee may petition the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) to reestablish the pressure drop range provided the permittee can demonstrate to the satisfaction of the CCHD, APCD that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform weekly checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g. windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

## IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

## **V. Testing Requirements (continued)**

### **1.a** Emission Limitation:

20% opacity as a 6-minute average, for stack emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible particulate emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

### **1.b** Emission Limitation:

20% opacity as a 3-minute average, for fugitive emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

### **1.c** Emission Limitation:

7.33 pounds per hour of particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC Rule 3745-17-03(B)(10).

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD. The following parameters also shall be monitored and recorded during the emissions testing: the pressure drop across the baghouse and the process weight rate, in tons.

## **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Shot Blaster OB08 (P036)  
**Activity Description:** Wheelabrator Super II Tumblast shot cleaner

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Wheelabrator Super II Tumblast shot cleaner with a maximum process weight rate of 12.5 tons per hour controlled by a baghouse (SB2) - Shot Blaster OB08	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B), Figure II	19.5 pounds per hour of particulate emissions, as a combined limitation for emissions units P032 and P036  See A.I.2.a below.

##### 2. Additional Terms and Conditions

- Emissions units P032 and P036 are similar emissions units; therefore, the total uncontrolled mass rate of emissions (UMRE) from all of the units shall be used to determine the combined allowable emission limitation from Figure II of OAC rule 3745-17-11. The UMRE was calculated using an emission factor found in a document entitled "An Inventory of Iron Foundry Emissions" by Bernard S. Gutow, dated January, 1972. The document provided an emission factor for shot blasting operations of 15.5 pounds of particulates per ton of metal (uncontrolled). Multiplying this factor by the maximum process weight rate for each emissions unit gives a total UMRE of 232.5 pounds per hour of particulates. Using Figure II, the combined allowable emission rate is determined from curve P1 and the equation:  $A = 0.5782(U)^{0.6456}$ , where "U" is the UMRE.

##### II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water, while the emissions unit is in operation.

The permittee may petition the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) to reestablish the pressure drop range provided the permittee can demonstrate to the satisfaction of the CCHD, APCD that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

2. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

### V. Testing Requirements

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

**1.a** Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

**1.b** Emission Limitation:

19.5 pounds per hour of particulate emissions, as a combined limitation for emissions units P032 and P036

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

The tests shall be conducted while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD. The results from the emission tests for emissions units P032 and P036 shall be summed to determine compliance with the combined particulate emission limitation.

### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Box Furnace FB14 (P039)

**Activity Description:** Natural gas and No. 6 fuel oil fired Canton Drop Forge box furnace, maximum heat input 4.57 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas and fuel oil (No. 6 or better) fired Canton Drop Forge box furnace, with a maximum heat input of 4.57 mmBtu per hour - Furnace FB14 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-82(B)(4)	See A.II.2 below.
	OAC rule 3745-31-05(A)(3) (PTI 15-197)	See A.I.2.c and A.II below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.
- 2.c Compliance with this rule also includes compliance with OAC rules 3745-17-07(B), 3745-17-08(B), and 3745-18-82(B)(4).

##### II. Operational Restrictions

1. The permittee shall burn only natural gas and fuel oil (No. 6 or better) as fuel in this emissions unit.
2. Pursuant to OAC rule 3745-18-82(B)(4):
  - a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.
  - b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

3. For each day during which the permittee burns a fuel other than natural gas or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

### IV. Reporting Requirements

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall notify the CCHD, APCD in writing of any record which shows a deviation of the allowable sulfur content limitation based upon the sulfur content for each shipment of oil from section A.III above. The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 45 days after the deviation occurs.
3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **IV. Reporting Requirements (continued)**

4. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:
  - a. The facility-wide forge-shop furnace fuel oil burning rates.
  - b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
5. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:  
  
20% opacity as a 3-minute average for visible fugitive particulate emissions  
  
Applicable Compliance Method:  
  
If required, the permittee shall demonstrate compliance with this emission limitation through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).  
  
For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
  - 1.b Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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 OF09 (P040)

**Activity Description:** Natural gas fired Hagan pusher type quench and draw furnace, maximum heat input 13 MMBtu/hr

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired Hagan pusher type draw furnace, with a maximum heat input of 13 mmBtu per hour - Furnace OF09 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.
- Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 20.7 pounds per hour.

##### II. Operational Restrictions

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

##### III. Monitoring and/or Record Keeping Requirements

- 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.

##### IV. Reporting Requirements

- 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.
- All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

1.a Emission Limitation:

20% opacity as a 3-minute average for visible fugitive particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

1.b Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 20.7 pounds per hour.

Applicable Compliance Method:

The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials (steel billets) employed in this emissions unit do not generate SO<sub>2</sub> emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

## 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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 Furnace FR11 (P041)

**Activity Description:** 17 ft. natural gas and No. 6 fuel oil fired Hagan rotary furnace, maximum heat input 21.56 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 21.56 mmBtu per hour - Furnace FR11 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-82(B)(4)	See A.II.2 below.
	OAC rule 3745-31-05(A)(3) (PTI 15-291)	Particulate emissions shall not exceed 0.02 pound per mmBtu actual heat input and 0.438 ton per year.  Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.15 pound per mmBtu actual heat input and 0.05 ton per year. See A.I.2.c and A.I.2.d below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.
- 2.c Based on the calculations for establishing the emission limitations in PTI 15-291, the SO<sub>2</sub> emission limitation is applicable to natural gas firing only.
- 2.d Compliance with this rule also includes compliance with OAC rules 3745-17-07(B) and 3745-17-08(B).

##### II. Operational Restrictions

1. The permittee shall burn only natural gas and fuel oil (No. 6 or better) as fuel in this emissions unit.

## II. Operational Restrictions (continued)

2. Pursuant to OAC rule 3745-18-82(B)(4):
  - a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.
  - b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

## III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each day during which the permittee burns a fuel other than natural gas or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall maintain annual records of the amount of natural gas (in mmscf) and fuel oil (No. 6 or better) (in gallons) burned in this emissions unit.
5. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

#### IV. Reporting Requirements

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:
  - a. The facility-wide forge-shop furnace fuel oil burning rates.
  - b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### V. Testing Requirements

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

**1.a** Emission Limitation:

20% opacity as a 3-minute average for visible fugitive particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

**1.b** Emission Limitations:

Particulate emissions shall not exceed 0.02 pound per mmBtu actual heat input and 0.438 ton per year.

Applicable Compliance Method:

The particulate emissions generated by this emissions unit are due solely to the combustion of natural gas and fuel oil (No. 6 or better). The process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the heating process.

## V. Testing Requirements (continued)

When firing No. 2 fuel oil, compliance shall be determined by multiplying an emission factor of 2 pounds of particulates/1000 gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (143.7 gallons per hour) and dividing by the emissions unit's rated heat input capacity (21.56 mmBtu per hour). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98).

When firing No. 4 fuel oil, compliance shall be determined by multiplying an emission factor of 7 pounds of particulates/1000 gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (143.7 gallons per hour) and dividing by the emissions unit's rated heat input capacity (21.56 mmBtu per hour). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98).

When firing No. 5 fuel oil, compliance shall be determined by multiplying an emission factor of 10 pounds of particulates/1000 gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (143.7 gallons per hour) and dividing by the emissions unit's rated heat input capacity (21.56 mmBtu per hour). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98).

When firing No. 6 fuel oil, compliance shall be determined by multiplying an emission factor of  $[9.19(S) + 3.22]$  pounds of particulates/1000 gallons of oil fired, where S = the appropriate fuel oil sulfur content from section A.III.3, by the emissions unit's maximum hourly fuel oil firing capacity (143.7 gallons per hour) and dividing by the emissions unit's rated heat input capacity (21.56 mmBtu per hour). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98).

When firing natural gas, compliance shall be determined by multiplying an emission factor of 1.9 pounds of particulates/mm standard cu. ft. by the emissions unit's maximum hourly natural gas firing capacity (.0205 mm standard cu. ft./hr) and dividing by the emissions unit's rated heat input capacity (21.56 mmBtu per hour). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

Compliance with the annual emission limitation shall be demonstrated by summing the total particulate emissions from the burning of natural gas and fuel oil (No. 6 or better). The total particulate emissions from the burning of natural gas and fuel oil (No. 6 or better) shall be determined using the AP-42 emission factors cited above and the fuel usage records required pursuant to section A.III.4.

### 1.c Emission Limitations:

SO<sub>2</sub> emissions shall not exceed 0.15 pound per mmBtu actual heat input and 0.05 ton per year.

Applicable Compliance Method:

The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas and fuel oil (No. 6 or better). The process materials (steel billets) employed in this emissions unit do not generate SO<sub>2</sub> emissions during the heating process.

When burning natural gas, compliance with these limitations will be assumed due to the negligible percent sulfur, by weight, in the fuel.

### 1.d Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

## 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Shot Blaster OB11 (P045)

**Activity Description:** P045 formerly shotblast unit OB09 taken out of service 1/07

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Wheelabrator Super II Tumbblast shot cleaner with a maximum process weight rate of 12.5 tons per hour controlled by a baghouse (SB2) - Shot Blaster OB09	OAC rule 3745-17-07(A)	See A.I.2.a below.
	OAC rule 3745-17-11(B)	See A.I.2.a below.
	OAC rule 3745-31-05(A)(3) (PTI 15-421)	1.0 pound per hour of particulate emissions or no visible particulate emissions from the exhaust stack
		4.38 tons per year of particulate emissions

##### 2. Additional Terms and Conditions

- The emission limitation(s) specified in this rule is (are) less stringent than the emission limitation(s) established pursuant to the best available technology determination required by OAC rule 3745-31-05(A)(3).

##### II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water, while the emissions unit is in operation.

The permittee may petition the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) for reestablishment of the pressure drop range provided the permittee can demonstrate to the satisfaction of the CCHD, APCD that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

##### III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

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

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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 that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.  
  
The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the CCHD, APCD by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

### V. Testing Requirements

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

**1.a** Emission Limitation:

1.0 pound per hour of particulate emissions or no visible particulate emissions from the exhaust stack

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the pound per hour particulate emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5; otherwise, compliance shall be demonstrated by the absence of any visible emissions from the baghouse serving this emissions unit in accordance with 40 CFR Part 60, Appendix A, Method 22.

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD. The following parameters shall also be monitored and recorded during the emission testing: the pressure drop across the baghouse and the process weight rate, in tons.

**1.b** Emission Limitation:

4.38 tons per year of particulate emissions

Applicable Compliance Method:

This emission limitation was established by multiplying the allowable hourly emission limitation by the maximum annual hours of operation (8760 hours per year), and then dividing by 2000 pounds per ton. Therefore, compliance with this emission limitation can be assumed provided that the permittee complies with the hourly emission limitation.

### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Box Furnace FB06 (P046)

**Activity Description:** Natural gas and No. 6 fuel oil fired Canton Drop Forge box furnace, maximum heat input 5.33 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas and fuel oil (No. 6 or better) fired Canton Drop Forge box furnace, with a maximum heat input of 5.33 mmBtu per hour - Furnace FB06 (no stack)	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-82(B)(4)	See A.II.2 below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
- 2.b No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

##### II. Operational Restrictions

1. The permittee shall burn only natural gas and fuel oil (No. 6 or better) as fuel in this emissions unit.
2. Pursuant to OAC rule 3745-18-82(B)(4):
  - a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.
  - b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

### III. Monitoring and/or Record Keeping Requirements

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each day during which the permittee burns a fuel other than natural gas or fuel oil (No. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

### IV. Reporting Requirements

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### **IV. Reporting Requirements (continued)**

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:
  - a. The facility-wide forge-shop furnace fuel oil burning rates.
  - b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:  
  
20% opacity as a 3-minute average for visible fugitive particulate emissions  
  
Applicable Compliance Method:  
  
If required, the permittee shall demonstrate compliance with this emission limitation through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).  
  
For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
  - 1.b Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Die Washing (Z002)  
**Activity Description:** Cleaning of dies using kerosene and steam

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Die washing area for cleaning of dies using manual application of kerosene and hand held steam jet	OAC rule 3745-21-07(G)(2)	8 pounds per hour and 40 pounds per day of Organic Compounds (OC).

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

None

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification number of each solvent employed.
  - b. The number of gallons of each solvent employed.
  - c. The organic compound content of each solvent employed, in pounds per gallon.
  - d. The total number of hours this emissions unit was in operation.
  - e. The total organic compound emission rate for all solvents, in pounds per day [i.e., the summation of (b) x (c) for each solvent employed].
  - f. The total organic compound emission rate for all solvents, in pounds per hour, item (e) / (d).

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. An identification of each occurrence during which the hourly organic compound emissions from the die washing solvents exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.
  - b. An identification of day during which the hourly organic compound emissions from the die washing solvents exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

2. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

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

- 1.a Emissions Limitation:

8 pounds per hour and 40 pounds per day of Organic Compounds (OC)

Applicable Compliance Method:

Compliance shall be determined by the record keeping and submission of reports as specified in Sections A.III and A.IV above.

#### **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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**

Facility Name:  
Facility ID:  
Emissions Unit:

Facility Name:  
Facility ID:  
Emissions Unit:

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# Statement of Basis For Title V Permit

Part I - General	
Company Name	Canton Drop Forge
Premise Number	15 76 00 0073
What makes this facility a Title V facility?	The potential to emit for sulfur dioxide exceeds the 100 tpy Title V applicability threshold.
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A. All changes are listed and processed under the most stringent procedure (significant modification)
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	<p>B001 - coal fired boiler; B002 and B003 - oil/natural gas fired boilers; P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046: forge-shop furnaces:</p> <p style="padding-left: 40px;">-Added facility-wide Synthetic Minor limitations for HAP emissions of 9.0 tpy for any individual HAP and 24.0 tpy for all HAPs combined, to avoid subpart DDDDD MACT requirements.</p> <p style="padding-left: 40px;">-Revised SO2 rule citations based on Federal approval of state SIP, OAC 3745-18-82</p> <p>P029 and P030 (shot blasters): These two Emissions Units have been permanently shutdown and deleted from the TV permit.</p> <p>P032 and P036 (shot blasters): These Emissions Units shared a group limit for particulate emissions with P029 and P030, which were shut down. A new particulate emissions limit (reduced) has been incorporated.</p> <p>Z002 (die washing unit) : Added this non-insignificant Emissions Unit which had previously been overlooked and not included in the TV permit. Since the unit was installed prior to 1974, no PTI was required.</p> <p>B001 - coal fired boiler: CAM does not apply since the permit modifications made are not related to the CAM-subject emissions (i.e., the modification doesn't involve the CAM-affected PSEU).</p>

Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A. All changes are listed and processed under the most stringent procedure (significant modification)
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745- )	Other	
A.1	25-03	N	emission control action program requirements
A.2	N	Y	NAAQS modeling for SO2
A.3	Y	N	insignificant emissions units
A.4	77-07	N	Synthetic Minor limitations on HAP emissions from all fuel burning emissions units at the facility, 9.0 tpy for any individual HAP and 24.0 tpy for all HAPs combined, on a rolling 12-month sum, to avoid MACT requirements (40 CFR Part 63, Subpart DDDDD, boiler MACT).
A.5-A.6	77-07	N	Fuel sampling records and monthly record keeping requirements for facility-wide 12-month rolling sum of HAPs
A.7	77-07	N	Quarterly deviation reporting for facility-wide 12-month rolling sum of HAP emissions. Annual reports of actual facility-wide HAP emissions.
A.8	77-07	N	Compliance with facility-wide HAP emission limits based on record keeping requirements and field testing of the wet scrubber control efficiency if required.

**C** Instructions for Part II:

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

**Part III (Requirements Within the State and Federally Enforceable Section)**

Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	<b>BOILERS:</b>														
B001	20% opacity, 6-minute average (stack)	17-07(A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - scrubber operating parameter restrictions Misc. - none needed.
	0.150 lb PM/MMBtu actual heat input	17-10(C)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - scrubber operating parameter restrictions; ash content limitation Misc. - none needed.
	5.0 lbs SO <sub>2</sub> /MMBtu actual heat input 86 MMBtu/hr, 3-hr. average 62.5 MMBtu/hr, 24 hr. avg.	18-82(B)(1)	N	N	Y	Y	N	N	Y	Y	Y	Y	Y	N	OR - scrubber operating parameter restrictions; sulfur content limitation; limits on maximum heat input rate CAM not applicable R - daily records of average heat input Rp - quarterly deviation reports of exceedance of 3-hr and 24-hr. heat input limits; Misc. - none needed.
	Minimum stack height of 147.5 ft.	18-82(B)(2)	N	N	Y	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET: stack height verification by field inspection
B002	20% opacity, 6-minute average (stack)	17-07(A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - burn only natural gas and #6 fuel oil Misc. - none needed.
	0.15 lb PM/MMBtu actual heat input	17-10(C)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - burn only natural gas and #6 fuel oil Misc. - none needed.
	2.5 lbs SO <sub>2</sub> /MMBtu actual heat input	18-82(B)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - burn only natural gas and #6 fuel oil; limits on fuel sulfur content Misc. - none needed.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B003	20% opacity 6-minute average (stack)	17-07(A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - burn only natural gas and #6 fuel oil Misc. - none needed.
	0.15 lb PM/MMBtu actual heat input	17-10(C)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - burn only natural gas and #6 fuel oil Misc. - none needed.
	2.5 lbs SO2/MMBtu actual heat input	18-82(B)(3)	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - burn only natural gas and #6 fuel oil; limits on fuel sulfur content Misc. - none needed.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	<b>ROTARY FURNACES:</b>														
P001 P002	No applicable limit	17-07(A)(1)	N	N	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.
P003 P004 P005 P006	20% opacity, 3-min. average (fugitive)	17-07(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup. Misc. - none needed.
P007 P009 and P010	RACM - none; see comment	17-08(B)	N	N	Y	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.
	No applicable limit.	17-11	N	Y	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.
	775 gal/hr, 18,600 gal/day, 6,789,000 gal/yr fuel oil for forge furnaces group limit. 0.05% sulfur in fuel oil.	18-82(B)(4)	N	N	Y	Y	N	N	Y	Y	Y	Y	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup; limits on total fuel oil consumption and fuel oil sulfur content; R - keep records of total hourly, daily and annual fuel oil burned in forge shop furnaces (group limit); Rp - Quarterly deviation reports on fuel oil burning rates and 0.05% sulfur in fuel oil limits. Misc. - none needed.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													
P041	No applicable limit	17-07(A)(1)	N	N	N	N	N	N	N	N	N	N	N	N	Or, M, R, Rp, ET, Misc. - none needed.	
	20% opacity, 3-minute average (fugitive)	17-07(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup. ET, Misc. - none needed.	
	RACM - none; see comment	17-08(B)	N	N	Y	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.	
	No applicable limit.	17-11	N	Y	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.	
	775 gal/hr, 18,600 gal/day, 6,789,000 gal/yr fuel oil for forge furnaces group limit. 0.05% sulfur in fuel oil.	18-82(B)(4)	N	N	Y	Y	N	N	N	Y	Y	Y	Y	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup; limits on total fuel oil consumption and fuel oil sulfur content; R - keep records of total hourly, daily and annual fuel oil burned in forge shop furnaces (group limit); Rp - Quarterly deviation reports on fuel oil burning rates and 0.05% sulfur in fuel oil limits. Misc. - none needed.
	0.02 lb PM/MMBtu actual heat input	N	Y	N	Y	Y	N	N	N	Y	N	Y	N	Y	N	Other - OAC rule 3745-31-05 BAT limitation. OR - use of natural gas as primary fuel and #6 fuel oil as the backup. M, R, Rp, ET, Misc. - none needed.
	0.15 lb SO2/MMBtu actual heat input	N	Y	N	Y	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05 BAT limitation. OR - use of natural gas as primary fuel and #6 fuel oil as the backup. M, R, Rp, ET, Misc. - none needed.
	0.438 tpy PM	N	Y	N	Y	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05 BAT limitation. OR - use of natural gas as primary fuel and #6 fuel oil as the backup. M, R, Rp, ET, Misc. - none needed.
															OR - use of natural gas as primary fuel and #6 fuel oil as the backup.	

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P041	0.05 tpy SO2	N	Y	N	Y	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05 BAT limitation. OR - use of natural gas as primary fuel and #6 fuel oil as the backup. M, R, Rp, ET, Misc. - none needed.
	<b>BOX FURNACES:</b>														
P016 P017 P019 P020 P021 and P046	No applicable limit	17-07(A)(1)	N	N	N	N	N	N	N	N	N	N	N	N	Or, M, R, Rp, ET, Misc. - none needed.
	20% opacity, 3-minute average (fugitive)	17-07(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup. ET, Misc. - none needed.
	RACM - none; see comment	17-08(B)	N	N	Y	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.
	No applicable limit.	17-11	N	Y	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.
	775 gal/hr, 18,600 gal/day, 6,789,000 gal/yr fuel oil for forge furnaces group limit. 0.05% sulfur in fuel oil.	18-82(B)4	N	N	Y	Y	N	N	Y	Y	Y	N	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup; limits on total fuel oil consumption and fuel oil sulfur content; R - keep records of total hourly, daily and annual fuel oil burned in forge shop furnaces (group limit); Rp - Quarterly deviation reports on fuel oil burning rates and 0.05% sulfur in fuel oil limits. Misc. - none needed.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745- )	Other													
P039	20% opacity, 3-minute average (fugitive)	17-07(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup. Misc. - none needed.	
	RACM - none; see comment	17-08(B)	N	N	Y	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.	
	No applicable limit.	17-11	N	Y	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.	
	775 gal/hr, 18,600 gal/day, 6,789,000 gal/yr fuel oil for forge furnaces group limit. 0.05% sulfur in fuel oil.	18-82(B)(4)	N	N	Y	Y	N	N	N	Y	Y	Y	Y	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup; limits on total fuel oil consumption and fuel oil sulfur content; R - keep records of total hourly, daily and annual fuel oil burned in forge shop furnaces (group limit); Rp - Quarterly deviation reports on fuel oil burning rates and 0.05% sulfur in fuel oil limits. Misc. - none needed.
	BAT was determined to be in compliance with all applicable air pollution control rules.	N	Y													Other - OAC rule 3745-31-05

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	<b>HEAT TREAT FURNACES:</b>														
P023 P024 P026 P027 and P040	No applicable limit	17-07(A)(1)	N	N	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.
	20% opacity, 3-minute average (fugitive)	17-07(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - exclusive use of natural gas. Misc. - none needed.
	RACM - none; see comment	17-08(B)	N	N	Y	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.
	No applicable limit.	17-11	N	Y	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.
	20.7-37.4 lbs of SO2/hr (See specified emissions unit limitations)	18-06(E)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup. Misc. - none needed.
	<b>SHOT BLASTERS:</b>														
P032 and P036	20% opacity, 6-minute average (stack)	17-07(A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - baghouse pressure drop limitation Misc. - none needed.
	19.5 lbs PM/hr, combined limit from the exhaust stacks	17-11	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - baghouse pressure drop limitation Misc. - none needed.
P045	20% opacity, 6-minute average (stack)	17-07(A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - baghouse pressure drop limitation Misc. - none needed.
	BAT is more restrictive	17-11	N	N	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.
	1.0 lb PM/hr or no visible emissions from the exhaust stack	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other - OAC rule 3745-31-05 emission limitation. OR - baghouse pressure drop limitation.
	4.38 tpy PM	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05 emission limitation.  OR, M, R, Rp, ET, Misc. - none needed.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	<b>GRINDING:</b>														
P033 P034 and P035	20% opacity, 6-minute average (stack)	17-07(A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - baghouse pressure drop limitation. Misc. - none needed
	20% opacity, 3-minute average (fugitive)	17-07(B)(1)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	OR & Misc. - none needed.
	RACM - use of three-sided booth	17-08(B)	N	N	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.
	7.33 lbs PM/hr	17-11	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - baghouse pressure drop limitation. Misc. - none needed.
	<b>MISCELLANEOUS:</b>														
Z002	8 lbs/hr and 40 lbs/day OC	21-07(G)(2)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

### C Instructions for Part III:

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not

simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

**C** **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.