



State of Ohio Environmental Protection Agency

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09/26/01

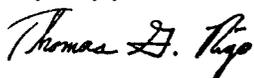
**RE: Proposed Title V Chapter 3745-77 Permit
03-74-01-0109
National Electrical Carbon**

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

Dear Ms. Damico:

The proposed issuance of the Title V permit for National Electrical Carbon, has been created in Ohio EPA's State Air Resources System (STARS) on 09/26/01, for review by USEPA. This proposed action is identified in STARS as  3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and  Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact Mike Ahern, DAPC Permit Management Unit supervisor at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,



Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northwest District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 09/26/01

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 03-74-01-0109 to: National Electrical Carbon 200 North Town Street Fostoria, OH 44830

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

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include units like B001 (Boiler #4), P076 (Brush Dumping), P127 (South Raymond Mill), etc.

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 3745-77-04(A) 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:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, 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.
- 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., 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.) See B.8 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to

the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- 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 are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

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.

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.

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. 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.

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.

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.

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.

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 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.

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.

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 appropriate Ohio EPA District Office or local air agency 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 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.

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.

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).

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.

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, except that no such notice shall be required for changes that qualify as insignificant emission 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; and
- 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.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

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.

18. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

B. State Only Enforceable Section

1. 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.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) 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. 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 quarterly, i.e., 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.)

3. 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.

4. 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.

5. 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).

6. 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.

7. 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.

8. 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 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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

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

Bldg. 61 Lindberg Ovens, Ohio EPA Emissions Unit P006;
#1 Automation Line (Graphite Grinders), Ohio EPA Emissions Unit P036;
Elec. Bake Furnaces, Ohio EPA Emissions Unit P054;
Radiation Furnaces, Ohio EPA Emissions Unit P055;
General Storage Silos, Ohio EPA Emissions Unit P063;
Lindberg Oven, Ohio EPA Emissions Unit P066;
Core Mixer 19A, Ohio EPA Emissions Unit P068;
Cloth Inspection Table, Ohio EPA Emissions Unit P069;
Cloth Graphitizer, Ohio EPA Emissions Unit P070;
Sagger Spray Booth, Ohio EPA Emissions Unit P072;
Cement Mixing, Ohio EPA Emissions Unit P073;
Spectroscopic Machining (Lathes), Ohio EPA Emissions Unit P077;
Spectroscopic Machining (Grinding), Ohio EPA Emissions Unit P078;
Bldg.77 Bake Furnaces, Ohio EPA Emissions Unit P083;
New Side Airvey System, Ohio EPA Emissions Unit P085;
Manual Copper Plating, Ohio EPA Emissions Unit P086;
Sagger Bake, Ohio EPA Emissions Unit P088;
Cloth Graphitizer, Ohio EPA Emissions Unit P089;
Box Furnace, Ohio EPA Emissions Unit P091;
Brush Oven (9613), Ohio EPA Emissions Unit P092;
N. 20-Gallon Mixer, Ohio EPA Emissions Unit P097;
S. 20-gallon Mixer, Ohio EPA Emissions Unit P098;
FHP N.Lindberg Oven, Ohio EPA Emissions Unit P099;
FHP S.Lindberg Oven, Ohio EPA emissions unit P100;
TCE Air Stripper, Ohio EPA Emissions Unit P102;
DCA Air Stipper, Ohio EPA Emissions Unit P103;
Porous Carbon Heater and Mixer, Ohio EPA Emissions Unit P104;
Coke Screening System (bldg 61), Ohio EPA Emissions Unit P105;
Furnace B-1 (Electric), Ohio EPA Emissions Unit P111;
Furnace B-2 (Electric), Ohio EPA Emissions Unit P112;
Furnace B-3 (Electric), Ohio EPA Emissions Unit P113;
Furnace B-4 (Electric), Ohio EPA Emissions Unit P114;
Furnace B-5 (Electric), Ohio EPA Emissions Unit P115;

B. State Only Enforceable Section (continued)

Furnace B-6 (Electric), Ohio EPA Emissions Unit P116;
Furnace B-7 (Electric), Ohio EPA Emissions Unit P117;
Furnace B-8 (Electric), Ohio EPA Emissions Unit P118;
CNC Lathe 1, Ohio EPA Emissions Unit P124;
Cylinder Mixer #1, Ohio EPA Emissions Unit P201;
Cylinder Mixer #2, Ohio EPA Emissions Unit P202;
Cylinder Mixer #3, Ohio EPA Emissions Unit P203;
Cylinder Mixer #4, Ohio EPA Emissions Unit P204;
Cylinder Mixer #5, Ohio EPA Emissions Unit P205;
Cylinder Mixer #6, Ohio EPA Emissions Unit P206;
Bread Mixers #1 (For Extrusion), Ohio EPA Emissions Unit P207;
Bread Mixers #2 (For Extrusion), Ohio EPA Emissions Unit P208;
Bread Mixers #3 (For Extrusion), Ohio EPA Emissions Unit P209;
Bread Mixers #4 (For Extrusion), Ohio EPA Emissions Unit P210;
Bread Mixers #5 (For Extrusion), Ohio EPA Emissions Unit P211;
Bread Mixers #6 (For Extrusion), Ohio EPA Emissions Unit P212;
Chemical Room (Crusher), Ohio EPA Emissions Unit P213;
Chemical Room (Oxide Screeners), Ohio EPA Emissions Unit P214;
Chemical Room (RE Screeners), Ohio EPA Emissions Unit P215;
North Floor Crusher/ 4th Floor Mill, Ohio EPA Emissions Unit P216;
Farrell Mixer & Conveyors, Ohio EPA Emissions Unit Z001;
Mixers, Weigh Lorry & Cooling Bin, Ohio EPA Emissions Unit Z002;
Autocore and Mixing Process, Ohio EPA Emissions Unit Z003;
Sagger Packing Station, Ohio EPA Emissions Unit Z004;
Core Mix and Plug Cool, Ohio EPA Emissions Unit Z005;
Flat Bed Pellet Mill-Fume, Ohio EPA Emissions Unit Z008;
Vert. Pellet Mill -Fume, Ohio EPA Emissions Unit Z009;
Green Scrap System Filter Receiver, Ohio EPA Emissions Unit Z011;
Crusher/Mill/Screen(Associated with P067), Ohio EPA Emissions Unit Z012;
Drill Press, Ohio EPA Emissions Unit Z014;
8 inch Auger Extruder, Ohio EPA Emissions Unit Z015;
#4 Jumbo Extruder, Ohio EPA Emissions Unit Z016;
#5 Jumbo Extruder, Ohio EPA Emissions Unit Z017;

B. State Only Enforceable Section (continued)

#4 Jumbo Oven Hood, Ohio EPA Emissions Unit Z018;
Plug Press Hopper, Ohio EPA Emissions Unit Z020;
Plug Operation, Ohio EPA Emissions Unit Z022;
R&D Screen Mixer, Ohio EPA Emissions Unit Z023;
R&D Electric Ovens, Ohio EPA Emissions Unit Z024;
Low Temp Drying Oven, Ohio EPA Emissions Unit Z025;
NG Heating Units, Ohio EPA Emissions Unit Z026;
Plated Rod Drying, Ohio EPA Emissions Unit Z028;
Electric Heaters, Ohio EPA Emissions Unit Z029;
Soft Pitch Tank, Ohio EPA Emissions Unit Z030;
Jumbo Hopper, Ohio EPA Emissions Unit Z031;
Batch Blender, Ohio EPA Emissions Unit Z032;
Preheater Oven, Ohio EPA Emissions Unit Z033;
Cleaning Station Exhaust Hood, Ohio EPA Emissions Unit Z034;
Core Mixer Heater, Ohio EPA Emissions Unit Z035;
Raw Material Storage Bins, Ohio EPA Emissions Unit Z036;
Bliss Press, Ohio EPA Emissions Unit Z037;
Press Blender, Ohio EPA Emissions Unit Z038;
Flat Bed Hopper, Ohio EPA Emissions Unit Z039;
Sagger Tamper, Ohio EPA Emissions Unit Z040;
Sagger Molding, Ohio EPA Emissions Unit Z041;
HK wet saw, Ohio EPA Emissions Unit Z042;
Hand Corer, Ohio EPA Emissions Unit Z043;
Core Mixing, Ohio EPA Emissions Unit Z044;
Electric Oven, Ohio EPA Emissions Unit Z045;
Drying Ovens, Ohio EPA Emissions Unit Z046;
Glaze Ball Mill Mixer, Ohio EPA Emissions Unit Z047;
Water Storage, Ohio EPA Emissions Unit Z048;
Holding Tank, Ohio EPA Emissions Unit Z049;
E. Water Evap., Ohio EPA Emissions Unit Z050;

W. Water Evap., Ohio EPA Emissions Unit Z051;
Storage Silos, Ohio EPA Emissions Unit Z052;
SRS Oil Tank, Ohio EPA Emissions Unit Z053;
Nitrogen Storage, Ohio EPA Emissions Unit Z054;
UST #1, Ohio EPA Emissions Unit Z055;
UST #2, Ohio EPA Emissions Unit Z056;
Radiant Heat., Ohio EPA Emissions Unit Z057;
Battery Charge, Ohio EPA Emissions Unit Z058;
Welding, Ohio EPA Emissions Unit Z059;
Maintenance, Ohio EPA Emissions Unit Z060;
Diesel UST, Ohio EPA Emissions Unit Z061;
Kerosene Tank, Ohio EPA Emissions Unit Z062;
Gasoline AST, Ohio EPA Emissions Unit Z063;
Diesel AST, Ohio EPA Emissions Unit Z064; and
Kerosene AST, Ohio EPA Emissions Unit Z065.

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 a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #4 (B001)

Activity Description: Natural gas fired boiler, 50mmBTU (to S73-01 and S73-02)

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>
boiler #4 - 50 mmBtu/hr - natural gas	OAC rule 3745-17-10 (B)(1)	0.020 lb particulate emissions (PE) per mmBtu of actual heat input
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

- 2.a Since natural gas is the only fuel fired in this emissions unit, OAC rule Chapter 3745-18 is not applicable. Hence, there is no SO₂ limitation established for this emissions unit.
- 2.b This emissions unit serves as control equipment for emissions units N002, P012 and P013. Therefore, additional monitoring, record keeping and reporting requirements have been established for this emissions unit to ensure compliance with the PE limitations for emissions units N002, P012 and P013. Furthermore, this emissions unit shall be operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel 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.
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 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 eliminate the visible emissions.

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. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the 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.

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:
0.020 lb PE per mmBtu of actual heat input

Applicable Compliance Method:

The permittee may determine compliance with the limit above by multiplying the emission factor for PE by the maximum hourly natural gas consumption rate (mm cu. ft/hr), and then dividing by the emissions unit's maximum heat input capacity (mmBtu/hr). Based on AP-42, 5th Edition, Section 1.4, Table 1.4-2 (revised 07/98), the emission factor for filterable PE is 1.9 lbs/mm cu. ft of natural gas.

If required, the permittee shall demonstrate compliance with the emission limit above pursuant to OAC rule 3745-17-03(B)(9).

- 1.b Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above in accordance with the methods specified in OAC 3745-17-03(B)(1).

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit and emissions units N002, P012 and P013 in accordance with the following requirements:
 - a. The emission testing shall be conducted within 3 months after issuance of the permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: Methods 1 - 5, 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while this emissions unit and emissions units N002, P012 and P013 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

V. Testing Requirements (continued)

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

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: Boiler #5 (B005)
Activity Description: Supplemental Heat (to S78-01)

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>
boiler #5 - 50 mmBtu/hr - natural gas and/or number 2 fuel oil	OAC rule 3745-17-10 (B)(1)	0.020 lb particulate emissions (PE) per mmBtu of actual heat input
	OAC rule 3745-18-06(D)	1.6 lbs SO ₂ per mmBtu of actual heat input
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall burn only natural gas and/or number 2 fuel oil in this emissions unit.
2. The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in Section A.I. above.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas and/or number 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, 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).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier. When a shipment of oil is received with a sulfur content that would result in a calculated sulfur dioxide emission rate higher than the allowable emission rate, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of oil for only those months when oil is combusted in this emissions unit.
3. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number 2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon a volume-weighted average of 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 Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the deviation occurs.

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:
0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method-

When firing natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu. ft/hr) by the emission factor for natural gas [from AP-42, Section 1.4, Table 1.4-2 (revised 7/98)] of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

When firing number 2 oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the emission factor for number 2 oil [from AP-42, Section 1.3, Table 1.3-1 (revised 9/98)] of 2.0 lbs PE (filterable)/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods specified in OAC rule 3745-17-03(B)(10).

- 1.b Emission Limitation:
1.6 lbs SO₂/mmBtu of actual heat input

Applicable Compliance Method:

When firing fuel oil, except as provided below, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

If the sulfur content of each shipment of oil received during a calendar month does not comply with the allowable emission limitation on an "as-received" basis, compliance with the allowable sulfur dioxide emission limitation shall be based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil during the calendar month.

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with the 1.6 lbs SO₂/mmBtu limitation in accordance with Method 6 of 40 CFR Part 60, Appendix A.

- 1.c Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation in accordance with the methods specified in OAC 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: National Incinerator (N002)
Activity Description: #1 National Furnace for trash incineration with Afterburner

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>
incinerator - National Furnace 1 - 6 tons/batch, 8 hrs/batch - with emissions unit B001 as afterburner	OAC rule 3745-17-09(B)	0.10 lb particulate emissions (PE)/100 lb waste charged
	OAC rule 3745-17-07(A)	See section A.I.2.a.
	OAC rule 3745-31-05 (PTI 03-6950)	1.44 lbs PE/hr
		4.0 lbs nitrogen oxides (NOx)/hr
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-09(B).
		See A.I.2.b.

2. Additional Terms and Conditions

- 2.a** The visible emission limitation in this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05 (A)(3).
- 2.b** The visible emissions from this emissions unit shall not exceed five percent opacity, as a ten-minute average, except for one ten-minute period in any sixty-minute period.

II. Operational Restrictions

1. The combustion temperature within the thermal incinerator shall be a minimum of 1200 degrees Fahrenheit when the emissions unit is in operation.
2. Prior to start-up of the incinerator, the permittee shall remove ash residue left inside the furnace after the previous burn cycle.
3. The permittee shall not process uncured paint or paint sludge, paint filters, waste powder from powder coating operations, nitrocellulose paints, solvents, thinners, PVC, lead, plastisols, rubber-coated material, oil, grease, magnesium, oil filters, ammunition, explosives, fertilizer, any hazardous waste materials as defined in 40 CFR Part 261, Subpart D, or any infectious waste materials as defined in OAC 3745-75-01, in this incinerator. Paint hooks covered with coatings that may contain chlorine (e.g. PVC), fluorine (e.g. Teflon), or elements other than carbon, hydrogen, and oxygen are also prohibited from being processed in this incinerator.

II. Operational Restrictions (continued)

4. All emissions from this emissions unit shall be vented to the afterburner (emissions unit B001). The permittee shall operate and maintain emissions unit B001 in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-6950, issued on March 31, 1993: A.III.2 and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All periods of time during which the combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1200 degrees Fahrenheit.
- b. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 03-6950, issued on March 31, 1993: A.IV.2 and 3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all periods of time during which the combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above; and
 - b. a log of the downtime for the capture (collection) system, control device and monitoring equipment when this emissions unit was in operation.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #03-6950, issued on March 31, 1993: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 2.a** Emission Limitations:
0.10 lb PE/100 lbs of waste charged
1.44 lbs PE/hr

Applicable Compliance Method:

Compliance shall be based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5 (see Sections V.2 and 3 of emissions unit B001 of this permit).

- 2.b** Emission Limitation:
4.0 lbs NOx/hr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable NOx emission limitation above by multiplying the emission factor for NOx from USEPA's AP-42, Table 1.4-2 by the maximum hourly fuel consumption rate (mm cu. ft /hr). Based on AP-42, 5th Edition (revised 07/98), the emission factor for NOx is 100 lbs/mm cu. ft of natural gas.

If required, the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation above in accordance with 40 CFR, Part 60, Appendix A, Method 1 through 4 and 7.

- 2.c** Visible Emission Restriction:
5% opacity, as a ten-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with procedures specified in USEPA Reference Method 9 (40 CFR, Part 60, App. A) with the opacity values determined based on a 10-minute average.

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: Coke Screening Sys. (P008)
Activity Description: Screens, bins, mills, and filter receiver

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>
coke sizing and pneumatic handling system - with baghouse	OAC rule 3745-17-11(B)(1)	4.1 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The pressure drop across the process baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process 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 process baghouse on a daily basis.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in Section A.II.1 above. The deviation reports shall be submitted as specified in General Condition 3 of this permit.

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:
4.1 lbs PE/hr

Applicable Compliance Method:

To determine the actual maximum PE rate (E), the permittee may use the following equation:

$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times [EF \times (1-CE)]$

E = PE rate (lbs/hr)

EF = 250 lbs PE/ton**

CE = control efficiency of the control system (assumed to be 99 percent)

* 2000 lbs/hr, from the Title V permit application

** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable PE emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

1.b Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: DB40 System (P011)

Activity Description: Mills, blender, and filter receiver (to S42-21, S42-17, S42-23)

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>
DB40 milling system - pitch, carbon lampblack - with baghouse	OAC rule 3745-17-11(B)(1)	3.4 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure drop across the process baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process 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 process baghouse on a daily basis.

IV. Reporting Requirements

- The permittee shall submit quarterly deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in Section A.II.1 above. The deviation reports shall be submitted as specified in General Condition 3 of this permit.

V. Testing Requirements

- 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:
3.4 lbs PE/hr

Applicable Compliance Method:

To determine the actual maximum PE rate (E), the permittee may use the following equation:

$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times [EF \times (1-CE)]$

E = PE rate (lbs/hr)

EF = 100 lbs PE/ton**

CE = control efficiency of the control system (assumed to be 96 percent)

* 1500 lbs/hr, from the Title V permit application

** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitations above pursuant to OAC rule 3745-17-03(B)(10).

1.b Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: #2 Natnl. Furnace (P012)

Activity Description: (12) #2 National Furnaces natural gas (to Boiler #4)

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>
#2 National Furnaces - natural gas (batch process) - with emissions unit B001 as afterburner	OAC rule 3745-17-11(B)(1)	2.6 lbs particulate emissions (PE)/hr (for emissions units P012 and P013, combined)
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-21-07(G)	none (See Section A.I.2.a.)

2. Additional Terms and Conditions

- 2.a This emissions unit doesn't employ any "liquid organic material," as defined in OAC rule 3745-21-01. Therefore, it is exempt from the requirements of OAC rule 3745-21-07(G).
- 2.b Since all emissions from this emissions unit are vented to emissions unit B001, it is not necessary to establish monitoring, record keeping and reporting requirements for this emissions unit to ensure compliance with the emission limitations above. [The monitoring , record keeping and reporting requirements are established for emissions unit B001.]

II. Operational Restrictions

1. All emissions from this emissions unit shall be vented to the afterburner (emissions unit B001). The permittee shall operate and maintain emissions unit B001 in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

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:
2.6 lbs PE/hr (for emissions units P012 and P013, combined)

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation shall be based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5 (see Sections V.2 and 3 of emissions unit B001 of this permit).

- 1.b** Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: #1 Natnl. Furnace (P013)

Activity Description: (10) #1 National Furnaces natural gas (to Boiler #4)

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>
#1 National Furnaces - natural gas (batch process) - with emissions unit B001 as afterburner	OAC rule 3745-17-11(B)(1)	2.6 lbs particulate emissions (PE)/hr (for emissions units P012 and P013, combined)
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-21-07(G)	none (See Section A.I.2.a.)

2. Additional Terms and Conditions

- 2.a This emissions unit doesn't employ any "liquid organic material," as defined in OAC rule 3745-21-01. Therefore, it is exempt from the requirements of OAC rule 3745-21-07(G).
- 2.b Since all emissions from this emissions unit are vented to emissions unit B001, it is not necessary to establish monitoring, record keeping and reporting requirements for this emissions unit to ensure compliance with the emission limitations above. [The monitoring , record keeping and reporting requirements are established for emissions unit B001.]

II. Operational Restrictions

1. All emissions from this emissions unit shall be vented to the afterburner (emissions unit B001). The permittee shall operate and maintain emissions unit B001 in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

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:
2.6 lbs PE/hr (for emissions units P012 and P013, combined)

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation shall be based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5 (See Sections V.2 and 3 of emissions unit B001 of this permit).

- 1.b** Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: Pack Condition Sys (P016)

Activity Description: Coke pack conditioning (crushing, screening, and blending) (to DC 28N)

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>
coke pack conditioning system - coke sizing and pneumatic handling - with baghouse (for building 28)	OAC rule 3745-17-11(B)(1)	6.5 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure drop across the process baghouse shall be maintained within the range of 1 to 7 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process 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 process baghouse on a daily basis.

IV. Reporting Requirements

- The permittee shall submit quarterly deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in Section A.II.1 above. The deviation reports shall be submitted as specified in General Condition 3 of this permit.

V. Testing Requirements

- 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:
6.5 lbs PE/hr

Applicable Compliance Method:

To determine the actual maximum PE rate (E), the permittee may use the following equation:

$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times [EF \times (1-CE)]$

E = PE rate (lbs/hr)

EF = 25 lbs PE/ton**

CE = control efficiency of the control system (assumed to be 95 percent)

* 4000 lbs/hr, from the Title V permit application

** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

1.b Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: Brush Ovens (P018)
Activity Description: K&B Heat treat ovens with incinerator (to S-42-22)

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>
heat treat ovens - carbon brush stock (natural gas) - with afterburner	OAC rule 3745-17-11(B)(1)	0.72 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-21-07(G)	none (See Section A.I.2.a.)

2. Additional Terms and Conditions

- 2.a This facility is located in Seneca County [not a "Priority I" County as indicated in paragraph (A) of OAC rule 3745-21-06] and is not a "new source". Therefore, pursuant to OAC rule 3745-21-07(A), it is exempt from the requirements of OAC rule 3745-21-07(G).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. 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 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 eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the 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.

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:
0.72 lb PE /hr

Applicable Compliance Method:

To determine the actual maximum PE rate (E), the permittee may use the following equation:

$$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times [EF \times (1-CE)]$$

$$E = \text{PE rate (lbs/hr)}$$

$$EF = 53 \text{ lbs PE/ton (assuming worst-case that all material loss is PE)**}$$

$$CE = \text{control efficiency of the control system (assumed to be 85 percent)}$$

* 150 lbs/hr, from the Title V permit application

** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

1.b Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: PC Bldg. 45 & 67 (P035)

Activity Description: Sawing and grinding of carbon and graphite stock to finished sizes (to DC 45-06).

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>
sawing and grinding - carbon and graphite - with baghouse	OAC rule 3745-17-11(B)(1)	4.8 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure drop across the process baghouse shall be maintained within the range of 1 to 7 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process 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 process baghouse on a daily basis.

IV. Reporting Requirements

- The permittee shall submit quarterly deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in Section A.II.1 above. The deviation reports shall be submitted as specified in General Condition 3 of this permit.

V. Testing Requirements

- 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:
4.8 lbs PE /hr

Applicable Compliance Method:

To determine the actual maximum PE rate (E), the permittee shall use the following equation:

$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times [EF \times (1-CE)]$

E = PE rate (lbs/hr)

EF = 100 lbs PE/ton**

CE = control efficiency of the control system (assumed to be 96 percent)

* 2500 lbs/hr, from the Title V permit application

** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

1.b Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: #2 Black Line (P037)

Activity Description: Carbon rod, butt and point grinding machines (to DC45-36)

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>
#2 black line - grinding operation - with baghouse	OAC rule 3745-17-11(B)(1)	1.6 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure drop across the process baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process 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 process baghouse on a daily basis.

IV. Reporting Requirements

- The permittee shall submit quarterly deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in Section A.II.1 above. The deviation reports shall be submitted as specified in General Condition 3 of this permit.

V. Testing Requirements

- 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:
1.6 lbs PE/hr

Applicable Compliance Method:

To determine the actual maximum PE rate (E), the permittee may use the following equation:

$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times [EF \times (1-CE)]$

E = PE rate (lbs/hr)

EF = 100 lbs PE/ton**

CE = control efficiency of the control system (assumed to be 95 percent)

* 500 lbs/hr, from the Title V permit application

** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

1.b Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods and procedures in OAC 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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 Calciner (P051)

Activity Description: Rotary Calciner process (to stacks 17-27 & 79-42 and new thermal oxydizer FS-P051)

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>
rotary calciner - natural gas - with afterburner (afterburner also serves emissions unit P106)	OAC rule 3745-17-11(B)	1.4 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-21-07(G)	none (See Section A.1.2.a.)

2. Additional Terms and Conditions

- 2.a This facility is located in Seneca County [not a "Priority I" County as indicated in paragraph (A) of OAC rule 3745-21-06] and is not a "new source". Therefore, pursuant to OAC rule 3745-21-07(A), it is exempt from the requirements of OAC rule 3745-21-07(G).

II. Operational Restrictions

1. The combustion temperature within the afterburner shall be a minimum of 2000 degrees Fahrenheit when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the afterburner when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All periods of time during which the combustion temperature within the afterburner, when the emissions unit was in operation, was less than 2000 degrees Fahrenheit.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

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 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 eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all periods of time during which the combustion temperature within the afterburner did not comply with the temperature limitation specified above; and
 - b. a log of the downtime for the capture (collection) system, control device and monitoring equipment when this emissions unit was in operation.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the 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.

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:
1.4 lbs PE/hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the emission limit above pursuant to OAC rule 3745-17-03(B)(10). [The results of emission testing conducted on December 18, 1997 showed a PE rate of 0.051 lb/hr.]

- 1.b Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: Bld. 61 elect. Bake (P059)

Activity Description: Graphitization of carbon rounds and misc. shapes (to EF 61-10 through 61-03)

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>
electric induction graphitizing bake furnaces - building 61	OAC rule 3745-21-07(G)	none (See Section A.1.2.a.)

2. **Additional Terms and Conditions**

- 2.a This facility is located in Seneca County [not a "Priority I" County as indicated in paragraph (A) of OAC rule 3745-21-06] and is not a "new source". Therefore, pursuant to OAC rule 3745-21-07(A), it is exempt from the requirements of OAC rule 3745-21-07(G).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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: Bldg. 19 Mixing (P067)

Activity Description: Metalgrade blending, crusher mill screen system (to S 19-03 and DC19-28)

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>
metalgrade crushing, screening, milling, mixing - with baghouse	OAC rule 3745-17-11(B)(1)	1.6 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process 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 process baghouse on a daily basis.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in Section A.II.1 above. The deviation reports shall be submitted as specified in General Condition 3 of this permit.

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:
1.6 lbs PE/hr

Applicable Compliance Method:

To determine the actual maximum PE rate (E), the permittee may use the following equation:

$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times [EF \times (1-CE)]$

E = PE rate (lbs/hr)

EF = 60 lbs PE/ton**

CE = control efficiency of the control system (assumed to be 95 percent)

* 500 lbs/hr, from the Title V permit application

** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

1.b Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: Brush Dumping (P076)

Activity Description: Unloading of saggars at the bush dumping station, Bld 17 (to DC 17-29)

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>
brush dumping, sagger unloading - with baghouse	OAC rule 3745-17-11(B)(1)	4.5 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure drop across the process baghouse shall be maintained within the range of 1 to 7 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process 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 process baghouse on a daily basis.

IV. Reporting Requirements

- The permittee shall submit quarterly deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in Section A.II.1 above. The deviation reports shall be submitted as specified in General Condition 3 of this permit.

V. Testing Requirements

- 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:
4.5 lbs PE /hr

Applicable Compliance Method:

To determine the actual maximum PE rate (E), the permittee may use the following equation:

$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times [EF \times (1-CE)]$

E = PE rate (lbs/hr)

EF = 10 lbs PE/ton**

CE = control efficiency of the control system (assumed to be 95 percent)

* 7000 lbs/hr, from the Title V permit application

** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

1.b Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: Disc Grinder (P079)
Activity Description: Grind graphite blocks to finished size (to DC 51)

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>
disc grinder - graphite blocks - with baghouse	OAC rule 3745-17-11(B)(1)	2.8 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The pressure drop across the process baghouse shall be maintained within the range of 1 to 7 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process 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 process baghouse on a daily basis.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in Section A.II.1 above. The deviation reports shall be submitted as specified in General Condition 3 of this permit.

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:
2.8 lbs PE/hr

Applicable Compliance Method:

To determine the actual maximum PE rate (E), the permittee may use the following equation:

$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times [EF \times (1-CE)]$

E = PE rate (lbs/hr)

EF = 40 lbs PE/ton**

CE = control efficiency of the control system (assumed to be 95 percent)

* 1150 lbs/hr, from the Title V permit application

** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

1.b Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: Pitch Autoclave (P087)
Activity Description: Petroleum pitch autoclave (To S 44-07)

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>
autoclave - coal tar impregnation of carbon pieces	OAC rule 3745-21-07(G)	none (See Section A.I.2.a.)

2. Additional Terms and Conditions

- 2.a This facility is located in Seneca County [not a "Priority I" County as indicated in paragraph (A) of OAC rule 3745-21-06] and is not a "new source". Therefore, pursuant to OAC rule 3745-21-07(A), it is exempt from the requirements of OAC rule 3745-21-07(G).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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: Car Botton Kiln#1 (P094)

Activity Description: Car bottom kiln #1, nat.gas, with afterburner (S 17-01)

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>
car bottom kiln 1 - with afterburner	OAC rule 3745-21-07(G)	none (See Section A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See Section A.I.2.b.)
	OAC rule 3745-17-07(A)	none (See Section A.I.2.c.)
	OAC rule 3745-31-05 (PTI 03-3824)	0.1 lb volatile organic compounds (VOC) per hour, average, per firing cycle

2. Additional Terms and Conditions

- 2.a This emissions unit doesn't employ any "liquid organic material," as defined in OAC rule 3745-21-01. Therefore, it is exempt from the requirements of OAC rule 3745-21-07(G).
- 2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
 - * The burning of natural gas is the only source of PE from this emissions unit.
- 2.c This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

II. Operational Restrictions

1. The combustion temperature within the afterburner shall be a minimum of 1300 degrees Fahrenheit when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the afterburner when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All periods of time during which the combustion temperature within the afterburner, when the emissions unit was in operation, was less than 1300 degrees Fahrenheit.
- b. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all periods of time during which the combustion temperature within the afterburner did not comply with the temperature limitation specified above; and
 - b. a log of the downtime for the capture (collection) system, control device and monitoring equipment when this emissions unit was in operation.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

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:

Emission Limitation:
0.1 lb VOC per hour, average, per firing cycle

Applicable Compliance Method:

To determine the actual maximum VOC emission rate (E), the permittee may use the following equation:

$$E = \text{maximum process throughput}^*, \text{ in pounds per hour} \times [EF \times (1-CE)]$$

$$E = \text{VOC emission rate (lbs/hr)}$$

$$EF = 180 \text{ lbs VOC/ton}^{**}$$

$$CE = \text{control efficiency of the control system (assumed to be 99 percent)}$$

* 96 lbs/hr (average, for maximum batch size), from the Title V permit application

** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limit above pursuant to Method 25 of 40 CFR, Part 60, Appendix A.

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: Cloth Scouring Unit (P096)
Activity Description: Cloth scouring unit with re Fridgerated chiller

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>
vaporized solvent cleaning unit - Rayon cloth - trichloroethylene - with re Fridgerated chiller	OAC rule 3745-21-07(G)(2)	8 lbs organic compounds (OC) per hr, 40 lbs OC per day
	OAC rule 3745-31-05 (PTI 03-4814)	See Section A.II. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- 2.a This emissions unit does not clean metal parts. Therefore, OAC rule 3745-21-09(O) is not an applicable rule. Additionally, USEPA's 40 CFR 63, Subpart T is not applicable either since it does not apply to the use of halogenated solvents to remove excess oil during the production of porous materials (see May 26, 1999 correspondence from US EPA Region V to the permittee). The permittee cleans Rayon fabric (which is a porous material) in this emissions unit.

II. Operational Restrictions

1. The permittee shall ensure that the re Fridgerated chiller is maintained in good working order and is operated at all times during operation of the emissions unit.
2. The emissions unit shall be equipped with covers for closing off the entrance and exit when not in use and shall be operated and maintained in a manner which is consistent with good engineering practice and minimizes solvent evaporation from the unit.

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 company identification of each material employed.
 - b. The number of gallons of each material employed.
 - c. The organic compound content of each material employed, in pounds per gallon.
 - d. The total OC emission rate for all of the materials employed [summation of (b x c) for all materials], in pounds.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly OC emission rate for all of the materials employed, i.e., (d)/(e), in pounds per hour (average).

IV. Reporting Requirements

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

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

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:

Emission Limitations:
8 lbs OC per hr, 40 lbs OC per day

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable OC emission limitations above through the record keeping requirements established in Section A.III.1 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all of the materials.

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: Car Bottom Kiln #2 (P101)

Activity Description: Carbon baking, car bottom kiln #2 w/afterburner (to S 17-02)

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>
car bottom kiln 2 - with afterburner	OAC rule 3745-21-07(G)	none (See Section A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See Section A.I.2.b.)
	OAC rule 3745-17-07(A)	none (See Section A.I.2.c.)
	OAC rule 3745-31-05 (PTI 03-3824)	0.12 lb volatile organic compounds (VOC) per hour, average, per firing cycle

2. Additional Terms and Conditions

- 2.a This emissions unit doesn't employ any "liquid organic material," as defined in OAC rule 3745-21-01. Therefore, it is exempt from the requirements of OAC rule 3745-21-07(G).
- 2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
 - * The burning of natural gas is the only source of PE from this emissions unit.
- 2.c This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

II. Operational Restrictions

1. The combustion temperature within the afterburner shall be a minimum of 1300 degrees Fahrenheit when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the afterburner when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All periods of time during which the combustion temperature within the afterburner, when the emissions unit was in operation, was less than 1300 degrees Fahrenheit.
- b. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all periods of time during which the combustion temperature within the afterburner did not comply with the temperature limitation specified above; and
 - b. a log of the downtime for the capture (collection) system, control device and monitoring equipment when this emissions unit was in operation.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

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:

Emission Limitation:
0.12 lb VOC per hour, average, per firing cycle

Applicable Compliance Method:

To determine the actual maximum VOC emission rate (E), the permittee may use the following equation:

$$E = \text{maximum process throughput}^*, \text{ in pounds per hour} \times [EF \times (1-CE)]$$

$$E = \text{VOC emission rate (lbs/hr)}$$

$$EF = 180 \text{ lbs VOC/ton}^{**}$$

$$CE = \text{control efficiency of the control system (assumed to be 99 percent)}$$

* 96 lbs/hr (average, for maximum batch size), from the Title V permit application

** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limit above pursuant to Method 25 of 40 CFR, Part 60, Appendix A.

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: Vertical Calciner (P106)

Activity Description: Electric Vertical Shaft Calciner (to [new] thermal oxydizer FS-P051)

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>
vertical calciner - electric - with afterburner (afterburner also serves emissions unit P051)	OAC rule 3745-17-11(B)	See Section A.I.2.a.
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-21-07(G)	none (See Section A.I.2.b.)
	OAC 3745-31-05 (PTI 03-10897)	0.1 lb particulate emissions (PE)/hr, 0.31 ton/yr PE
		4.0 lbs sulfur dioxide (SO ₂)/hr, 12.2 tons/yr SO ₂
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b This emissions unit doesn't employ any "liquid organic material," as defined in OAC rule 3745-21-01. Therefore, it is exempt from the requirements of OAC rule 3745-21-07(G).
- 2.c The 4.0 lbs/hour and 12.2 tons/yr SO₂ emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.d The permittee will be requesting a PTI modification to increase the maximum process weight rate for this emissions unit (see Section VI of this permit). [The permittee erroneously represented the maximum process weight rate as 200 lbs/hr for this emissions unit in its application for PTI modification # 03-10897, dated October 29, 1997. The maximum process weight rate has been corrected/ updated in the permittee's Title V permit application.] Therefore, until a PTI modification is issued, the permittee shall restrict its maximum process weight rate to no more than 200 lbs/hr.

II. Operational Restrictions

1. The combustion temperature within the afterburner shall be a minimum of 2000 degrees Fahrenheit when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the afterburner when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All periods of time during which the combustion temperature within the afterburner, when the emissions unit was in operation, was less than 2000 degrees Fahrenheit.
 - b. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
2. The permittee shall calculate and record each day the following information for this emissions unit:
 - a. the process weight rate, in pounds;
 - b. the number of hours the emissions unit was in operation; and
 - c. the average hourly process weight rate (a/b), in lbs/hr (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all periods of time during which the combustion temperature within the afterburner did not comply with the temperature limitation specified above;
 - b. a log of the downtime for the capture (collection) system, control device and monitoring equipment when this emissions unit was in operation; and
 - c. all exceedances of the hourly process weight rate restriction of 200 lbs.

The deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

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 Limitations:
0.1 lb PE/hr, 0.31 ton/yr PE

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to OAC rule 3745-17-03(B)(10). [The results of emission testing conducted on December 18, 1997 showed a PE rate of 0.051 lb/hr.]

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limit was determined by multiplying the hourly emission limitation by 6100* and dividing by 2000).

* annual maximum potential hours of operation for this emissions unit, based upon extreme maintenance requirements

- 1.b** Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

- 1.c** Emission Limitation:
4.0 lbs SO₂/hr, 12.2 tons/yr

Applicable Compliance Method:

The 4.0 lbs/hour and 12.2 tons/yr SO₂ emission limitations reflect the potentials to emit for this emissions unit based on a maximum process weight rate of 200 lbs/hr. Therefore, as long as compliance with the hourly process weight restriction is maintained, compliance with the hourly SO₂ limitation shall be assumed.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limit was determined by multiplying the hourly emission limitation by 6100* and dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable SO₂ emission limitation above in accordance Method 6, 40 CFR, Part 60, Appendix A.

* annual maximum potential hours of operation for this emissions unit, based upon extreme maintenance requirements

VI. Miscellaneous Requirements

1. The permittee erroneously represented the maximum process weight rate as 200 lbs/hr for this emissions unit in its application for PTI modification # 03-10897, dated October 29, 1997. The maximum process weight rate has been corrected/ updated to 400 lbs/hr in the permittee's Title V permit application. Consequently, the permittee cannot show compliance with the potentials to emit for the SO₂ emissions for this emissions unit. Therefore, the permittee shall perform the following in order to bring this emissions unit into compliance:
 - a. submit a complete PTI modification application within 2 months following the issuance of this permit; and
 - b. obtain a PTI modification within 8 months following the issuance 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: Furnace G-1 (P119)
Activity Description: Electric Graphitizing Furnace (61-96-01)

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>
electric induction graphitizing bake furnaces - building 61 (G-1)	OAC rule 3745-21-07(G)	none (See Section A.I.2.a.)
	OAC rule 3745-31-05 (PTI 03-9481)	2.8 lbs carbon monoxide (CO)/hr
		0.96 lb organic compounds (OC)/hr

2. Additional Terms and Conditions

- 2.a This emissions unit doesn't employ any "liquid organic material," as defined in OAC rule 3745-21-01. Therefore, it is exempt from the requirements of OAC rule 3745-21-07(G).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

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:

- a. Emission Limitation:
2.8 lbs CO /hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limit in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 10.

- b. Emission Limitation:
0.96 lb OC /hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with 40 CFR, Part 60, Appendix A, Method 25.

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: Furnace G-2 (P120)
Activity Description: Electric Graphitizing Furnace (61-96-02)

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>
electric induction graphitizing bake furnaces - building 61 (G-2)	OAC rule 3745-21-07(G)	none (See Section A.I.2.a.)
	OAC rule 3745-31-05 (PTI 03-9481)	2.8 lbs carbon monoxide (CO)/hr
		0.96 lb organic compounds (OC)/hr

2. Additional Terms and Conditions

- 2.a This emissions unit doesn't employ any "liquid organic material," as defined in OAC rule 3745-21-01. Therefore, it is exempt from the requirements of OAC rule 3745-21-07(G).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

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:

- a. Emission Limitation:
2.8 lbs CO /hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limit in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 10.

- b. Emission Limitation:
0.96 lb OC /hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with 40 CFR, Part 60, Appendix A, Method 25.

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: Furnace G-3 (P121)
Activity Description: Electric Graphitizing Furnace (61-96-03)

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>
electric induction graphitizing bake furnaces - building 61 (G-3)	OAC rule 3745-21-07(G)	none (See Section A.I.2.a.)
	OAC rule 3745-31-05 (PTI 03-9481)	2.8 lbs carbon monoxide (CO)/hr
		0.96 lb organic compounds (OC)/hr

2. Additional Terms and Conditions

- 2.a This emissions unit doesn't employ any "liquid organic material," as defined in OAC rule 3745-21-01. Therefore, it is exempt from the requirements of OAC rule 3745-21-07(G).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

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:

- a. Emission Limitation:
2.8 lbs CO /hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limit in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 10.

- b. Emission Limitation:
0.96 lb OC /hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with 40 CFR, Part 60, Appendix A, Method 25.

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: Furnace G-4 (P122)
Activity Description: Electric Graphitizing Furnace (61-96-04A)

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>
electric induction graphitizing bake furnaces - building 61 (G-4)	OAC rule 3745-21-07(G)	none (See Section A.I.2.a.)
	OAC rule 3745-31-05 (PTI 03-9481)	2.8 lbs carbon monoxide (CO)/hr
		0.96 lb organic compounds (OC)/hr

2. Additional Terms and Conditions

- 2.a This emissions unit doesn't employ any "liquid organic material," as defined in OAC rule 3745-21-01. Therefore, it is exempt from the requirements of OAC rule 3745-21-07(G).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

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:

- a. Emission Limitation:
2.8 lbs CO /hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limit in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 10.

- b. Emission Limitation:
0.96 lb OC /hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with 40 CFR, Part 60, Appendix A, Method 25.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Furnace G-5 (P123)
Activity Description: Electric Graphitizing Furnace (61-96-04B)

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>
electric induction graphitizing bake furnaces - building 61 (G-5)	OAC rule 3745-21-07(G)	none (See Section A.I.2.a.)
	OAC rule 3745-31-05 (PTI 03-9481)	2.8 lbs carbon monoxide (CO)/hr
		0.96 lb organic compounds (OC)/hr

2. Additional Terms and Conditions

- 2.a This emissions unit doesn't employ any "liquid organic material," as defined in OAC rule 3745-21-01. Therefore, it is exempt from the requirements of OAC rule 3745-21-07(G).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

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:

- a. Emission Limitation:
2.8 lbs CO /hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limit in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 10.

- b. Emission Limitation:
0.96 lb OC /hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limit in accordance with 40 CFR, Part 60, Appendix A, Method 25.

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: Fabric Baking Furnace (P125)

Activity Description: Electric Baking of Rayon Felt to Thermal Oxydizer & stack

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>
continuous bake furnace - electric - Rayon felt - with thermal oxidizer	OAC rule 3745-21-07(G)	none (See Section A.I.2.a.)
	OAC rule 3745-31-05 (PTI 03-11272)	0.26 lb organic compounds (OC) per hour, 1.14 tons per year OC

2. Additional Terms and Conditions

- 2.a This emissions unit doesn't use any "liquid organic material," as defined in OAC rule 3745-21-01. Therefore, it is exempt from the requirements of OAC rule 3745-21-07(G).

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-11272, issued on April 22, 1998: A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-11272, issued on April 22, 1998: A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above; and
 - b. a log of the downtime for the capture (collection) system, control device and monitoring equipment when this emissions unit was in operation.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

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:

Emission Limitations:
0.26 lb OC per hour, 1.14 tons per year OC

Applicable Compliance Method:
Compliance with the hourly allowable OC emission limitation shall be based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Method 25.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limit was determined by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

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 3 months after issuance of the permit, or within 60 days after achieving the maximum production rate, whichever is later; however, not later than 180 days after initial start-up of the operation.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for OC.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 25, 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

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: North Raymond Mill (P126)

Activity Description: Crusher and Elevator (1st floor), North Mill Blender (5th floor), North Cyclone (roof), North 6-ton blender (1st floor), Flour bins #1-#17 (1st floor); (to DC 42-52, S42-52). This source is subject to rule 3745-17-11, table 1 process weight rate emission limit of 2.99 lbs/hr. Insignificant source determination based on rule 3745-17-11 process weight rate hourly emissions and 8760 hours per

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>
north Raymond Mill operations - crushing, milling, blending - with baghouse	OAC rule 3745-17-11(B)(1)	total of 11.2 lbs particulate emissions (PE)/hr (for all the stack emissions from the equipment comprising this emissions unit)
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

- 2.a All PE from the crushing, milling and blending operations shall be captured and vented to the baghouse.

II. Operational Restrictions

1. The pressure drop across the process baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process 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 process baghouse on a daily basis.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in Section A.II.1 above. The deviation reports shall be submitted as specified in General Condition 3 of this permit.

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:
11.2 lbs PE/hr

Applicable Compliance Method:

Compliance shall be based upon the results of emission testing conducted in accordance with 40 CFR 60, Appendix A, Methods 1 - 5.

To determine the actual maximum PE rate (E), the permittee may use the following equation:

$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times [EF \times (1-CE)]$

E = PE rate (lbs/hr)

EF = 60 lbs PE/ton**

CE = control efficiency of the control system (assumed to be 98 percent)

* 9000 lbs/hr, from the Title V permit application

** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

1.b Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

- 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 3 months after issuance of the permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: Methods 1 - 5, 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

V. Testing Requirements (continued)

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

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: South Raymond Mill (P127)

Activity Description: Crusher and Elevator (1st floor), South Mill Blender (5th floor), South Cyclone (roof), South 6-ton blender (1st floor), Flour bins #1-#17 (1st floor); (to DC 42-52, S42-52). This source is subject to rule 3745-17-11, table 1 process weight rate emission limit of 3.38 lbs/hr. Applicability of insignificant source definition based on rule 3745-17-11, process weight rate derived based on

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>
south Raymond Mill operations - crushing, milling, blending - with baghouse	OAC rule 3745-17-11(B)(1)	total of 5.4 lbs particulate emissions (PE)/hr (for all the stack emissions from the equipment comprising this emissions unit)
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

- 2.a All PE from the crushing, milling and blending operations shall be captured and vented to the baghouse.

II. Operational Restrictions

1. The pressure drop across the process baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process 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 process baghouse on a daily basis.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in Section A.II.1 above. The deviation reports shall be submitted as specified in General Condition 3 of this permit.

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:
5.4 lbs PE/hr

Applicable Compliance Method:

Compliance shall be based upon the results of emission testing conducted in accordance with 40 CFR 60, Appendix A, Methods 1 - 5.

To determine the actual maximum PE rate (E), the permittee may use the following equation:

$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times [EF \times (1-CE)]$

E = PE rate (lbs/hr)

EF = 60 lbs PE/ton**

CE = control efficiency of the control system (assumed to be 98 percent)

* 3000 lbs/hr, from the Title V permit application

** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

1.b Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

- 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 3 months after issuance of the permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: Methods 1 - 5, 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

V. Testing Requirements (continued)

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

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: JB Mill (P128)

Activity Description: JB Mill Cyclones, Screens, Brush Blenders, Brush Crushers, 1-ton Blender; (to DC 42-52, DC 42-48, S42-48, S42-52). This source is subject to rule 3745-17-11, Table 1 process weight rate emission limit of 1.77 lbs/hr. Applicability of insignificant source definition based on rule 3745-17-11, process weight rate derived based on hourly emission rate at 8760 hours per year.

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>
JB mill operations - crushing, milling, blending - with baghouse	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	total of 3.0 lbs particulate emissions (PE)/hr (for all the stack emissions from the equipment comprising this emissions unit) 20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

- 2.a All PE from the crushing, milling and blending operations shall be captured and vented to the baghouse.

II. Operational Restrictions

1. The pressure drop across the process baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process 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 process baghouse on a daily basis.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in Section A.II.1 above. The deviation reports shall be submitted as specified in General Condition 3 of this permit.

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:
3.0 lbs PE/hr

Applicable Compliance Method:

Compliance shall be based upon the results of emission testing conducted in accordance with 40 CFR 60, Appendix A, Methods 1 - 5.

To determine the actual maximum PE rate (E), the permittee may use the following equation:

$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times [EF \times (1-CE)]$

E = PE rate (lbs/hr)

EF = 60 lbs PE/ton**

CE = control efficiency of the control system (assumed to be 98 percent)

* 1275 lbs/hr, from the Title V permit application

** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

1.b Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

- 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 3 months after issuance of the permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: Methods 1 - 5, 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

V. Testing Requirements (continued)

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

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: East Double Ram Press/Flour Bin (P129)

Activity Description: (to DC 42-48 and S42-48). This source is subject to rule 3745-17-11, Table 1 process weight rate emission limit of 1.77 lbs/hr. Applicability of insignificant source definition based on rule 3745-17-11, process weight rate derived based on hourly emission rate at 8760 hours per year.

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>
east double ram press, with 'flour' bin - with baghouse	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	1.8 lbs particulate emissions (PE)/hr 20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The pressure drop across the process baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process 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 process baghouse on a daily basis.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in Section A.II.1 above. The deviation reports shall be submitted as specified in General Condition 3 of this permit.

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:
1.8 lbs PE/hr

Applicable Compliance Method:

To determine the actual maximum PE rate (E), the permittee may use the following equation:

$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times [EF \times (1-CE)]$

E = PE rate (lbs/hr)

EF = 60 lbs PE/ton**

CE = control efficiency of the control system (assumed to be 98 percent)

* 580 lbs/hr, from the Title V permit application

** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

1.b Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: West Double Ram/Press Flour Bin (P130)

Activity Description: (to DC42-48 and S42-48). This source is subject to rule 3745-17-11, Table 1 process weight rate emission limit of 1.77 lbs/hr. Applicability of insignificant source definition based on rule 3745-17-11, process weight rate derived based on hourly emission rate at 8760 hours per year.

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>
west double ram press, with 'flour' bin - with baghouse	OAC rule 3745-17-11(B)(1)	1.8 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The pressure drop across the process baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process 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 process baghouse on a daily basis.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in Section A.II.1 above. The deviation reports shall be submitted as specified in General Condition 3 of this permit.

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:
1.8 lbs PE/hr

Applicable Compliance Method:

To determine the actual maximum PE rate (E), the permittee may use the following equation:

$$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times [EF \times (1-CE)]$$

$$E = \text{PE rate (lbs/hr)}$$

$$EF = 60 \text{ lbs PE/ton}^{**}$$

CE = control efficiency of the control system (assumed to be 98 percent)

* 580 lbs/hr, from the Title V permit application

** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

- 1.b** Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: Pipe and Tube Proc. (P217)
Activity Description: Sawing and cleaning pipe and tube stock (to DC 17-39)

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>
carbon pipe and tube processing - coke packing and dumping, sawing, mechanical cleaning - with baghouse	OAC rule 3745-17-11(B)(1)	3.4 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The pressure drop across the process baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process 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 process baghouse on a daily basis.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in Section A.II.1 above. The deviation reports shall be submitted as specified in General Condition 3 of this permit.

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:
3.4 lbs PE/hr

Applicable Compliance Method:

To determine the actual maximum PE rate (E), the permittee may use the following equation:

$$E = E1 + E2$$

$$E = \text{PE rate (lbs/hr)}$$

$$E1 = \text{maximum process throughput*}, \text{ in tons per hour X [EF1 X (1-CE)]}$$

$$E2 = \text{maximum process throughput**}, \text{ in tons per hour X [EF2 X (1-CE)]}$$

$$EF1 = 20 \text{ lbs PE/ton***}$$

$$EF2 = 30 \text{ lbs PE/ton***}$$

CE = control efficiency of the control system (assumed to be 95 percent)

* 1025 lbs/hr, from the Title V permit application (for carbon pipes and tubes)

** 460 lbs/hr, from the Title V permit application (for coke packing)

*** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

- 1.b** Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: Farrel Mixer- fume exhaust (P218)
Activity Description: Fume exhaust from Farrel Mixer Bld.42 Stack 42-05

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>
Farrel mixer	OAC rule 3745-21-07(G)	none (See Section A.I.2.a.)

2. Additional Terms and Conditions

- 2.a This facility is located in Seneca County (not a "Priority I" County as indicated in paragraph (A) of OAC rule 3745-21-06) and is not a "new source". Therefore, pursuant to OAC rule 3745-21-07(A), it is exempt from the requirements of OAC rule 3745-21-07.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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: MicroMill System (P219)
Activity Description: Fine milling process in Bld. 42 with recovery system

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>
micromill system - with baghouse	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	1.9 lbs particulate emissions (PE)/hr 20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure drop across the process baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the process 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 process baghouse on a daily basis.

IV. Reporting Requirements

- The permittee shall submit quarterly deviation (excursion) reports that identify each period where the recorded pressure drop was not within the range specified in Section A.II.1 above. The deviation reports shall be submitted as specified in General Condition 3 of this permit.

V. Testing Requirements

- 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:
1.9 lbs PE /hr

Applicable Compliance Method:

To determine the actual maximum PE rate (E), the permittee may use the following equation:

$$E = \text{maximum process throughput}^*, \text{ in tons per hour} \times [EF \times (1-CE)]$$

$$E = \text{PE rate (lbs/hr)}$$

$$EF = 60 \text{ lbs PE/ton}^{**}$$

$$CE = \text{control efficiency of the control system (assumed to be 96 percent)}$$

* 625 lb/hr, from the Title V permit application

** based on material balance calculations supplied by the company

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

- 1.b** Emission Limitation:
20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible emissions limitation above pursuant to the methods in OAC 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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

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