



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

Mailing Address:

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

03/05/03

CERTIFIED MAIL

**RE: Preliminary Proposed Title V
Chapter 3745-77 permit**

03-87-00-0376
Charter Steel
Jeff Richards
6255 U.S. Highway 23 South
Risingsun, OH 43457

Dear Jeff Richards:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 01/15/03. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **Please submit, in writing, any comments you may have within fourteen (14) days from your receipt of this letter to:**

Ohio Environmental Protection Agency
Jim Orlemann, Manager, Engineering Section
Division of Air Pollution Control
P.O.Box 1049
Columbus, OH 43216-1049

and

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

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Very truly yours,


Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northwest District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date: 03/05/03	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 03-87-00-0376 to:
Charter Steel
 6255 U.S. Highway 23 South
 Risingsun, OH 43457

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

P001 (Pickling Line #1) Pickling Line #1 - Cleaning and coating of wire and rod in coil form (w/ a total of 12.56 MMBTU/hr from two boilers)	P901 (Shotblast Unit #1) Shotblast Unit #1 - Blast cleaning of steel using metal shot
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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 Record Keeping 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))
- c. The permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
 - ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**
 - (a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (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. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii)

pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i), (ii) and (iii))

- (b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, record keeping, 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.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

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

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

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 of any emissions unit(s) 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 OAC rule 3745-15-06, 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).

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

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.

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

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

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

- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

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

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

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

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

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after

promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.
(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

14. Operational Flexibility

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

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

15. Emergencies

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

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

16. Off-Permit Changes

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

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant 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.
- 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 purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

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

17. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

18. Insignificant Activities

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

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

19. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

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

20. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this

permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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.)

2. Records Retention Requirements

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

3. Inspections and Information Requests

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

4. Scheduled Maintenance/Malfunction Reporting

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

5. Permit Transfers

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

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

If no 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:

air make-up unit <10mmBtu/hr (Z001);
gas generators #1 & #2 (Z002);
roadways & parking areas (Z003);
annealing furnace #4 (Z004);
annealing furnace #5 (Z005);
annealing furnace #6 (Z006);
gas generators #3 & #4 (Z007);
annealing furnace #1 (P002);
annealing furnace #2 (P003); and
annealing furnace #3 (P004).

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 (PTI) for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Pickling Line #1 (P001)

Activity Description: Pickling Line #1 - Cleaning and coating of wire and rod in coil form (w/ a total of 12.56 MMBTU/hr from two boilers)

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>
batch pickling line, equipped with four scrubbers	40 CFR, Part 63, Subpart CCC	18 parts per million, by volume, (ppmv) of hydrochloric acid (HCl)
		See A.I.2.a.
	40 CFR, Part 63, Subpart A	General Provisions (See A.I.2.b.)
	OAC rule 3745-17-11(B)(4)	none (See A.I.2.c.)
	OAC rule 3745-17-07(A)	none (See A.I.2.d.)
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See section A.I.2.e.
	OAC rule 3745-18-06(E)	None, exempt pursuant to OAC rule 3745-18-06(C). (See A.I.2.f.)
	OAC rule 3745-31-05(A)(3) (PTI No. 03-13374)	12.2 pounds HCl/hour, 53.4 tons HCl/year
		0.6 pound nitrogen oxides (NOx)/hour, 2.6 tons NOx /year
		0.1 pound particulate emissions (PE)/hour, 0.4 ton PE/year
	1.0 pound carbon monoxide (CO)/hour, 4.4 tons CO/year	
	The requirements of this rule also include compliance with the requirements of 40 CFR, Part 63, Subpart CCC and Subpart A and OAC rules 3745-18-06(E), 3745-21-08(B) and 3745-23-06(B).	

2. Additional Terms and Conditions

- 2.a The permittee has chosen to demonstrate compliance with 40 CFR, Part 63.1158(a)(2)(i) by employing four scrubbers. The HCl concentration in the exhaust gases from the scrubbers shall not exceed 18 ppmv.
- 2.b This emissions unit is subject to the applicable requirements of 40 CFR, Part 63, Subpart A, as found in Table 1 of 40 CFR, Part 63, Subpart CCC.
- 2.c The uncontrolled mass rate of PE 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.d This emissions unit is exempt from the visible PE 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.
- 2.e The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install # 03-13374.
- 2.f There are no sulfur dioxide emission limitations established by OAC Chapter 3745-18 for this emissions unit because the process weight rate is less than 1,000 pounds/hour.

II. Operational Restrictions

1. The pressure drop across each scrubber shall be maintained within the range of 5.5 - 7.5 inches of water while the emissions unit is in operation.
2. The scrubbing liquid recirculation rate for each scrubber shall be maintained within the range of 100 - 300 gallons/minute while the emissions unit is in operation.
3. The scrubbing liquid pH for each scrubber shall be maintained within the range of 5.5 - 8.5 while the emissions unit is in operation.
4. The makeup water flow rate for each scrubber shall be maintained within the range of 1 - 2.5 gallons/minute while the emissions unit is in operation.
5. In accordance with 40 CFR, Part 63.6 (e), the permittee shall operate the emissions unit, including the associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the standard at all times, including during any period of startup, shutdown, or malfunction. Malfunctions must be corrected as soon as practical after their occurrence in accordance with the startup, shutdown and malfunction plan (see Section A.VI.3).
6. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the parameters identified in sections A.II.1 - 4 for each scrubber while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). [Each monitoring device shall be certified by the manufacturer to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year.]

The permittee shall record each parameter, as identified in sections A.II.1 - 4, for each scrubber on a once/shift basis. The permittee shall also maintain a log of all periods of time during which any of the scrubbers was down while the emissions unit was in operation.

2. In accordance with 40 CFR, Part 63.10 (b)(2), the permittee shall maintain records of the following information and retain the records for 5 years from the date of each record:
 - 2.a The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment).
 - 2.b The occurrence and duration of each malfunction of the air pollution control equipment.
 - 2.c All maintenance performed on the air pollution control equipment.
 - 2.d Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan.
 - 2.e All information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form (see 40 CFR, Part 63.10 (b)(2)(v)).
 - 2.f All required measurements needed to demonstrate compliance with the standard and to support data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests.
 - 2.g All results of initial or subsequent performance tests.
 - 2.h If the permittee has been granted a waiver from record keeping or reporting requirements under 40 CFR, Part 63.10 (f), any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements.
 - 2.i If the permittee has been granted a waiver from the initial performance test under 40 CFR, Part 63.7 (h), a copy of the full request and the Administrator's approval or disapproval.
 - 2.j All documentation supporting initial notifications and notifications of compliance status required by 40 CFR, Part 63.9.
 - 2.k Records of any applicability determination, including supporting analyses.
- 2.l The records for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.
3. The permittee shall keep the written operations and maintenance plan (See A.VI.3) on record after it is developed to be made available for inspection, upon request, by the Director for the life of the facility. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Director for a period of 5 years after each revision to the plan.
4. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. In accordance with 40 CFR, Part 63.10 (d)(5)(i), if actions taken by the permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the permittee shall state such information in a semiannual report. The report, to be certified by the permittee, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half.
2. Any time an action taken by an permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the permittee shall comply with all requirements of 40 CFR, Part 63.10 (d)(5)(ii) .
3. 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.
4. The permittee shall submit deviation (excursion) reports that identify all periods of time during which any of the parameters, identified in sections A.II.1 - 4, for each scrubber did not comply with the allowable ranges specified in sections A.II.1 - 4 of the terms and conditions of this permit. The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
5. The permittee shall submit quarterly summary reports that include a log of the downtime of all periods during which any of the scrubbers was down while the emissions unit was in operation. These reports shall be submitted by March 31, June 30, September 30 and December 31 of each year and shall cover the previous calendar quarter.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - 1.a The emission testing shall be conducted approximately 2.5 years after issuance of this permit and within 6 months prior to permit expiration.
 - 1.b The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate and the outlet concentration for HCl.
 - 1.c The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Method 26A, "Determination of Hydrogen Halide and Halogen Emissions from Stationery Sources-Isokinetic Method." The minimum sampling time for each run shall be 60 minutes and the minimum sample volume shall be 0.85 dry standard cubic meters (30 dry standard cubic feet).

V. Testing Requirements (continued)

1.d The concentrations of HCl shall be calculated for each run as follows:

$$C1HCl \text{ (ppmv)} = 0.659 C2HCl \text{ (mg/dscm)}$$

where:

C1HCl (ppmv) = the concentration of HCl, in ppmv

C2HCl (mg/dscm) = the concentration of HCl, in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A

0.659 = conversion factor

The permittee may use equivalent alternative measurement methods approved by the Director.

1.e Compliance with the applicable concentration standard shall be determined by the average of three consecutive runs or by the average of any three of four consecutive runs. Each run shall be conducted under conditions representative of normal process operations.

1.f The test(s) shall be conducted while the emissions units is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

1.g 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 emission 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.

2. Compliance with the emissions limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emission Limitations:
HCl emissions shall not exceed 18 ppmv, 12.2 pounds HCl/hour, 53.4 tons HCl/year

Applicable Compliance Method

Compliance with the allowable outlet HCl concentration and the pounds/hour HCl emission limitation shall be based upon the results of emission testing conducted in accordance with Methods 1 - 4 and 26A of 40 CFR, Part 60, Appendix A.

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

2.b Emission Limitations:
0.1 pound PE/hour, 0.4 ton PE/year

Applicable Compliance Method

Compliance with the allowable pound PE/hour limitation may be demonstrated by multiplying the maximum hourly natural gas consumption rate (11,962 cubic feet/hour) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft.

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

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

2.c Emission Limitations:
0.6 pound NOx/hour, 2.6 tons NOx/year

Applicable Compliance Method

Compliance with the allowable pound NOx/hour emission limitation may be demonstrated by multiplying the maximum hourly natural gas consumption rate (11,962 cubic feet/hour) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) of 100 lbs NOx/mm cu. ft.

If required, compliance with the hourly allowable NOx emission limitation shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

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

2.d Emission Limitations:
1.0 pound CO/hour, 4.4 tons CO/year

Applicable Compliance Method

Compliance with the allowable pound CO/hour emission limitation shall be demonstrated by multiplying the maximum hourly natural gas consumption rate (11,962 cubic feet/hour) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) of 84 lbs CO/mm cu. ft.

If required, compliance with the hourly allowable CO emission limitation shall be determined in accordance with Methods 1 - 4 and 10 of 40 CFR, Part 60, Appendix A.

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

VI. Miscellaneous Requirements

1. In delegating implementation and enforcement authority to a State under 40 CFR, Part 63, Subpart E, the following authorities shall be retained by the Administrator and not transferred to a State:
 - 1.a Approval of alternative emission standards to those standards specified in 40 CFR, Part 63.1157 and 63.1158.
 - 1.b Approval of alternative measurement methods for HCl to those specified in 40 CFR, Part 63.1161(d)(1).
 - 1.c Approval of alternative monitoring requirements to those specified in 40 CFR, Part 63.1162(a)(2) through 63.1162 (a)(5) and 63.1162 (b)(1) through 63.1162 (b)(3).
 - 1.d Waiver of record keeping requirements specified in 40 CFR, Part 63.1165.

The following authorities shall be delegated to State: All other authorities, including approval of an alternative schedule for conducting performance tests to the requirement specified in 40 CFR, Part 63.1162 (a)(1).

2. In accordance with 40 CFR, Part 63.6 (e)(3), the permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard.
3. The permittee shall comply with the operation and maintenance requirements in 40 CFR, Part 63.6 (e). In addition to these requirements, the permittee shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date. The plan shall be incorporated by reference into the Title V permit. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:
 - 3.a Require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance.
 - 3.b Require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans.
 - 3.c Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling.
 - 3.d Require an inspection of each scrubber at intervals of no less than 3 months with:
 - i. Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices.
 - ii. Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components.
 - iii. Repair or replacement of droplet eliminator elements as needed.
 - iv. Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber.
 - v. Adjustment of damper settings for consistency with the required air flow.
 - 3.e If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternative means of inspection approved by the Administrator may be used.
 - 3.f The permittee shall initiate procedures for corrective action within 1 working day of detection of any operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan.
 - 3.g The permittee shall maintain a record of each inspection, including each item identified in condition VI.3.d, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement or other corrective action taken.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Shotblast Unit #1 (P901)
Activity Description: Shotblast Unit #1 - Blast cleaning of steel using metal shot

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>
shotblast unit, equipped with with 2 baghouses	OAC rule 3745-31-05(A)(3) (PTI No. 03-13506)	0.01 grain particulate emissions (PE)/dry standard cubic foot, 0.81 pound PE/hour, 3.55 tons PE/year (from the stacks associated with this emissions unit)* * All stack PE are assumed to be PM10. 2.51 tons fugitive PE/year Visible PE from the stacks associated with this emissions unit shall not exceed 5% opacity, as a 6-minute average [the visible PE limitation shall not apply to the exception listed in OAC rule 3745-17-07(A)(3)(c)]. Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average [the visible fugitive PE limitation shall not apply to the exception listed in OAC rule 3745-17-07(B)(11)(f)].
	OAC rule 3745-17-11(B)(3)	See A.I.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).
	OAC rule 3745-17-07(A)	The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(B)	none (See A.I.2.b.)
	OAC rule 3745-17-08(B)	none (See A.I.2.c.)

2. Additional Terms and Conditions

- 2.a Best available technology (BAT) for this emissions unit has been determined to be the use of 2 baghouses.
- 2.b This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because this fugitive dust source is not located within the geographical areas specified in Appendix A of OAC rule 3745-17-08.
- 2.c This emissions unit is exempt from the requirements specified in OAC rule 3745-17-08(B), pursuant to OAC rule 3745-17-08(A)(1), because this fugitive dust source is not located within the geographical areas specified in Appendix A of OAC rule 3745-17-08.

II. Operational Restrictions

1. The pressure drop across each baghouse shall be maintained within the range of 2 to 10 inches of water while the emissions unit is in operation.

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 #03-13506, issued on October 12, 2000: A.III.3 and 4. 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 properly operate and maintain equipment to monitor the pressure drop across each baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a daily basis.

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

3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) associated with 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:
- the location and color of the emissions;
 - whether the emissions are representative of normal operations;
 - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - the total duration of any visible emission incident; and
 - any corrective actions taken to minimize or eliminate the visible emissions.

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

4. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouses serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- the color of the emissions;
 - whether the emissions are representative of normal operations;
 - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - the total duration of any visible emission incident; and
 - any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

- 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 #03-13506, issued on October 12, 2000: A.IV.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.
- The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across either one of the baghouses did not comply with the allowable range specified above. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.
- The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouses serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) associated with this emissions unit, and (c) describe any corrective actions taken to eliminate the visible particulate emissions from the baghouses and/or minimize or eliminate the visible fugitive 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

- Compliance with the emissions limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - Emissions Limitation:**
0.01 grain PE/dry standard cubic foot

Applicable Compliance Method:
If required, compliance with the allowable PE limitation above shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.
 - Emissions Limitations:**
0.81 pound PE/hour, 3.57 tons PE/year (stack emissions)

Applicable Compliance Method:
Compliance with the allowable pound PE/hour limitation may be determined by multiplying the maximum outlet grain loading concentration (0.01 grain PE/dry standard cubic foot) by the maximum volumetric air flow rate (9,500 dry standard cubic feet/minute) and by 60, and then dividing by 7000.

If required, compliance with the hourly allowable PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable PE limitation shall be assumed as long as compliance with the hourly allowable PE limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).
 - Emissions Limitation:**
Visible PE shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, visible emissions observations shall be performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.
 - Emissions Limitation:**
2.51 tons PE/year (fugitive emissions)

Applicable Compliance Method:
The permittee may demonstrate compliance with the annual PE limitation above by multiplying the maximum process weight (108,098 tons iron/year) by the emission factor, from "An Inventory of Iron Foundry Emissions", by Bernard S. Gutow, Modern Castings, January 1972, of 15.5 pounds PE/ton and by the fraction of emissions not captured by the control system (1 - 0.99)*, and then by a control factor for the building enclosure (1 - 0.7).**

* the baghouse control efficiency is assumed to be 99%

** the control efficiency of the building is assumed to be 70%

V. Testing Requirements (continued)

- 1.e** Emissions Limitation:
Visible fugitive PE from this emissions unit shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:
If required, visible emissions observations shall be performed in accordance with Method 9 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.

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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