

Facility ID: 0684020006 Issuance type: Title V Proposed Permit

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

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

F003 - barge unloading;
 F015 - acid waste treatment;
 P026 - manganese milling;
 P912 - C7P bagger;
 P913 - MOR pelletizer;
 P914 - electrolytic manganese flake packaging;
 Z001 - chill spray prep;
 Z504 - furnace 1 hot metal;
 Z517 - lab equipment and hoods;
 Z518 - refrigerant reclaim & recycle;
 Z519 - 15,000-gallon diesel tank;
 Z520 - 6,000-gallon diesel tank;
 Z521 - refractory mix & apply;
 Z522 - used ladle repair;
 Z523 - new ladle prep;
 Z524 - gunite mix & application;
 Z525 - pigging conveyor;
 Z526 - ladle preheat operation;
 Z527 - simplex parts cleaner 1;
 Z528 - electrolytic chrome parts cleaner 1;
 Z529 - locomotive shop hydraulic parts cleaner;
 Z530 - electric shop parts cleaner;
 Z531 - locomotive shop parts cleaner 1;
 Z532 - locomotive shop parts cleaner 2;
 Z533 - machine shop parts cleaner;
 Z534 - C3F shop parts cleaner;
 Z535 - electrolytic chromium shop parts cleaner 2;
 Z536 - electrolytic manganese shop parts cleaner;
 Z537 - C1F shop parts cleaner;
 Z538 - south side shop parts cleaner;
 Z539 - simplex shop parts cleaner 2;
 Z540 - locomotive shop parts cleaner 3;
 Z904 - raw materials mix house;
 Z905 - C7P crush/size system 1;
 Z906 - C7P crush/size system 2;
 Z910 - sulfur burning;
 Z912 - furnace 1 slag handling;
 Z913 - furnace 1 feed system;
 Z914 - furnace 12 hot metal;
 Z915 - furnace 12 slag handling;
 Z916 - furnace 12 feed system;
 Z917 - furnace 18 hot metal;
 Z918 - furnace 18 slag handling;
 Z919 - furnace 18 feed system; and
 Z921 - C2P picking conveyor.

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.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0684020006 Emissions Unit ID: B005 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Cummins diesel generator	OAC rule 3745-31-05(A)(3) (PTI 06-4207)	1.04 tpy of particulate emissions The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B)(5)(a), 3745-18-06, 3745-21-08(B), and 3745-23-06(B).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(5)(a)	Particulate emissions shall not exceed 0.25 lb/mmBtu of actual heat input.
	OAC rule 3745-17-11(B)(5)(a)	See A.I.2.a below. Particulate emissions shall not exceed 0.310 lb/mmBtu of actual heat input.
	OAC rule 3745-18-06	See A.I.2.b below. exempt
	OAC rule 3745-21-08(B) OAC rule 3745-23-06(B)	See A.I.2.c below. See A.I.2.d below. See A.I.2.d below.

2. **Additional Terms and Conditions**

- a. The requirement to comply with this particulate emission limitation shall terminate on the date the U.S. EPA approves the 0.310 lb/mmBtu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
- b. This particulate emission limitation shall be effective and federally enforceable on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.
- c. This emissions unit has a rated heat input capacity which is less than 10 mmBtu/hr and a rated capacity which is less than 1000 lbs/hr process weight input and, as such, is exempt from the requirements of OAC rule 3745-18-06.
- d. 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 06-4207.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

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

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

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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 the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the 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.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the visible particulate emission observations specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996. No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.
 - b. Emission Limitation:

Particulate emissions shall not exceed 0.25 lb/mmBtu of actual heat input.

Applicable Compliance Method:

The permittee cannot demonstrate compliance with this emission limitation based upon the current emission factor contained in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96). The Ohio EPA revised the emission limitation specified in this rule citation based upon the currently applicable emission factor. The revised rule was adopted by the Director of Ohio EPA in December of 1997, and it will be submitted to the U.S. EPA as a proposed revision to the Ohio SIP for particulate matter. When the SIP revision is approved by the U.S. EPA, the 0.25 lb/mmBtu actual heat input emission limitation will no longer be applicable, and the permittee will be able to demonstrate compliance with the new emission limitation (0.310 lb/mmBtu actual heat input) using the current emission factor.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10). No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

c. Emission Limitation:

Particulate emissions shall not exceed 0.310 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.31 lb/mmBtu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10). No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

d. Emission Limitation:

1.04 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable particulate emission limitation, in lb/mmBtu, by the annual usage of diesel fuel, in gallons, and by 140,000 Btu/gallon, and then dividing by 2000 lbs/ton.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0684020006 Emissions Unit ID: B005 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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		

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0684020006 Emissions Unit ID: F001 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
paved roadways and parking areas (see section A.I.2.a)	OAC rule 3745-17-07(B)(4)	no visible particulate emissions except for 6 minutes during any 60-minute period
	OAC rule 3745-17-08(B), (B)(8), (B)(9)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.I.2.c and A.I.2.e through A.I.2.i)
unpaved roadways and parking areas (see section A.I.2.b)	40 CFR Part 63, Subpart XXX	See A.I.2.j below.
	OAC rule 3745-17-07(B)(5)	no visible particulate emissions except for 13 minutes during any 60-minute period
	OAC rule 3745-17-08(B), (B)(2)	reasonable available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.I.2.d, A.I.2.e, A.I.2.f, A.I.2.h, and

A.I.2.i)

40 CFR Part 63, Subpart XXX

See A.I.2.j below.

2. **Additional Terms and Conditions**

- a. The paved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

(a)

paved roadways:

North Plant paved roadway
South Plant paved roadway

paved parking areas:

employee parking area #1, main office area
employee parking area #2, Simplex/EIChrome area

- b. The unpaved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

unpaved roadways:

North Plant unpaved roadways
South Plant unpaved roadways

unpaved parking areas:

none

- c. The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee currently intends to treat the paved roadways and parking areas by flushing with water, sweeping, and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures in lieu of or in addition to the currently employed control measures previously mentioned to ensure compliance, as long as these control measures are equivalent to or better than what the permittee committed to in its permit application.

- d. The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee currently intends to treat the unpaved roadways and parking areas with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures in lieu of or in addition to the currently employed control measures previously mentioned to ensure compliance, as long as these control measures are equivalent to or better than what the permittee committed to in its permit application.

- e. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

- f. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.

- g. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

- h. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

- i. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

- j. [63.1654(a)]

The permittee must prepare, and at all times operate according to, a fugitive dust control plan that describes in detail the measures that will be put in place to control fugitive dust emissions from the individual fugitive dust emissions units at the facility. A copy of this plan must be submitted to the Ohio

EPA, Southeast District Office on or before November 21, 2001.

The permittee may use existing manuals that describe the measures in place to control fugitive dust emissions units required as part of the State implementation plan or other federally enforceable requirement for particulate matter to satisfy the requirement for a fugitive dust control plan.

[63.1656(e)(1)]

Failure to have a fugitive dust control plan or failure to report deviations from the plan and take necessary corrective action would be a violation of the general duty to ensure that fugitive dust emissions units are operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions per 40 CFR Part 63.6(e)(1)(i).

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and each parking area in accordance with the following frequencies:

paved roadways and parking areas minimum inspection frequency

North Plant paved roadway weekly
South Plant paved roadway weekly
employee parking area #1 weekly
employee parking area #2 weekly

unpaved roadways and parking areas minimum inspection frequency

North Plant unpaved roadways daily
South Plant unpaved roadways daily
2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
3. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.The information required in section A.III.4.d shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
4. The permittee shall maintain a record of each time a control measure for this emissions unit is not implemented in accordance with the fugitive dust control plan for the facility.

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IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The permittee shall submit deviation reports that identify each instance when a control measure, that was to be implemented in accordance with the fugitive dust control plan, was not implemented.

3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

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V. **Testing Requirements**

1. Compliance with the emission limitations for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03. No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0684020006 Emissions Unit ID: F001 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0684020006 Emissions Unit ID: F002 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
load-in or load-out of storage piles (see section A.I.2.a for identification of storage piles)	OAC rule 3745-17-07(B)(6)	There shall be no visible particulate emissions of fugitive dust except for 13 minutes during any 60-minute observation period.
	OAC rule 3745-17-08(B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust
wind erosion from storage piles	40 CFR Part 63, Subpart XXX	See sections A.I.2.b, A.I.2.c, and A.I.2.f. See A.I.2.g below.
	OAC rule 3745-17-07(B)(6)	There shall be no visible particulate emissions of fugitive dust except for 13 minutes during any 60-minute observation period.
	40 CFR Part 63, Subpart XXX	See sections A.I.2.d, A.I.2.e, and A.I.2.f. See A.I.2.g below.

2. Additional Terms and Conditions

- a. The storage piles that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:
 - (a)
 - storage piles in north area
 - storage piles in south area
 - storage piles in east area
 - b. The permittee shall employ reasonably available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee currently intends to treat the load-in and load-out operations with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies or minimize drop heights and load at a rate to minimize fugitive emissions to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures in lieu of or in addition to the currently employed control measures previously mentioned to ensure compliance, as long as these control measures are equivalent to or better than what the permittee committed to in its permit application.
 - c. The above-mentioned control measures shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures is unnecessary.

- d. The permittee shall employ reasonably available control measures for wind erosion from pile surfaces associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee currently intends to treat the pile working operations with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures in lieu of or in addition to the currently employed control measures previously mentioned to ensure compliance, as long as these control measures are equivalent to or better than what the permittee committed to in its permit application.
- e. The above-mentioned control measures shall be employed for each pile working operation and wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measures shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.
- g. [63.1654(a)]
The permittee must prepare, and at all times operate according to, a fugitive dust control plan that describes in detail the measures that will be put in place to control fugitive dust emissions from the individual fugitive dust emissions units at the facility. A copy of this plan must be submitted to the Ohio EPA, Southeast District Office on or before November 21, 2001.
- The permittee may use existing manuals that describe the measures in place to control fugitive dust emissions units required as part of the State implementation plan or other federally enforceable requirement for particulate matter to satisfy the requirement for a fugitive dust control plan.
- [63.1656(e)(1)]
Failure to have a fugitive dust control plan or failure to report deviations from the plan and take necessary corrective action would be a violation of the general duty to ensure that fugitive dust emissions units are operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions per 40 CFR Part 63.6(e)(1)(i).

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:
- storage pile identification minimum load-in inspection frequency
- storage piles in north area daily
storage piles in south area daily
storage piles in east area daily
2. Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:
- storage pile identification minimum load-out inspection frequency
- storage piles in north area daily
storage piles in south area daily
storage piles in east area daily
3. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:
- storage pile identification minimum wind erosion inspection frequency
- storage piles in north area daily
storage piles in south area daily
storage piles in east area daily
4. No inspection shall be necessary for wind erosion from the surface of a pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
5. The purpose of the inspections is to determine the need for implementing the control measures specified in

this permit for load-in or load-out of a storage pile, pile working operations, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

6. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in section A.III.7.d shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

7. The permittee shall maintain a record of each time a control measure for this emissions unit is not implemented in accordance with the fugitive dust control plan for the facility.

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IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The permittee shall submit deviation reports that identify each instance when a control measure, that was to be implemented in accordance with the fugitive dust control plan, was not implemented.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

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V. Testing Requirements

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

no visible particulate emissions of fugitive dust except for 13 minutes during any 60-minute observation period for load-in and load-out operations and wind erosion from the storage pile surfaces

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the visible particulate emission observations specified in Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03. No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0684020006 Emissions Unit ID: F002 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: F007 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
furnace #1 shop casting	OAC rule 3745-17-07 OAC rule 3745-17-08(B)	Exempt pursuant to OAC rule 3745-17-07(B)(11)(c). reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust
	40 CFR Part 63, Subpart XXX	See A.I.2.a below. See A.I.2.b below.

2. **Additional Terms and Conditions**

- a. The permittee shall employ reasonably available control measures on all hot metal casting for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee currently intends to perform such activities within the #1 furnace shop, and it is recognized that there is some incidental capture of emissions with the existing taphole fume collection hoods. Nothing in this paragraph shall prohibit the permittee from employing other control measures in lieu of or in addition to the currently employed control measures previously mentioned to ensure compliance, as long as these control measures are equivalent to or better than what the permittee committed to in its permit application.
- b. [63.1654(a)]
The permittee must prepare, and at all times operate according to, a fugitive dust control plan that describes in detail the measures that will be put in place to control fugitive dust emissions from the individual fugitive dust emissions units at the facility. A copy of this plan must be submitted to the Ohio EPA, Southeast District Office on or before November 21, 2001.

The permittee may use existing manuals that describe the measures in place to control fugitive dust emissions units required as part of the State implementation plan or other federally enforceable requirement for particulate matter to satisfy the requirement for a fugitive dust control plan.

[63.1656(e)(1)]
Failure to have a fugitive dust control plan or failure to report deviations from the plan and take necessary corrective action would be a violation of the general duty to ensure that fugitive dust emissions units are operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions per 40 CFR Part 63.6(e)(1)(i).

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II. **Operational Restrictions**

1. None

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

1. The permittee shall maintain a record of each time a control measure for this emissions unit is not implemented in accordance with the fugitive dust control plan for the facility.

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IV. **Reporting Requirements**

1. The permittee shall submit deviation reports that identify each instance when a control measure, that was to be implemented in accordance with the fugitive dust control plan, was not implemented.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0684020006 Emissions Unit ID: F007 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0684020006 Emissions Unit ID: F008 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
furnace #12 shop casting	OAC rule 3745-17-07 OAC rule 3745-17-08(B)	Exempt pursuant to OAC rule 3745-17-07(B)(11)(c). reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust
	40 CFR Part 63, Subpart XXX	See A.I.2.a below. See A.I.2.b below.

2. Additional Terms and Conditions

- a. The permittee shall employ reasonably available control measures on all hot metal casting for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee currently intends to perform such activities within the #12 and #18 furnace shops, and it is recognized that there is some incidental capture of emissions with the existing taphole fume collection hoods. Nothing in this paragraph shall prohibit the permittee from employing other control measures in lieu of or in addition to the currently employed control measures previously mentioned to ensure compliance, as long as these control measures are equivalent to or better than what the permittee committed to in its permit application.
- b. [63.1654(a)]
The permittee must prepare, and at all times operate according to, a fugitive dust control plan that describes in detail the measures that will be put in place to control fugitive dust emissions from the individual fugitive dust emissions units at the facility. A copy of this plan must be submitted to the Ohio EPA, Southeast District Office on or before November 21, 2001.

The permittee may use existing manuals that describe the measures in place to control fugitive dust emissions units required as part of the State implementation plan or other federally enforceable requirement for particulate matter to satisfy the requirement for a fugitive dust control plan.

[63.1656(e)(1)]
Failure to have a fugitive dust control plan or failure to report deviations from the plan and take necessary corrective action would be a violation of the general duty to ensure that fugitive dust emissions units are operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions per 40 CFR Part 63.6(e)(1)(i).

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain a record of each time a control measure for this emissions unit is not implemented in accordance with the fugitive dust control plan for the facility.

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IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify each instance when a control measure, that was to be implemented in accordance with the fugitive dust control plan, was not implemented.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

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V. Testing Requirements

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: F008 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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**

- 1. None

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0684020006 Emissions Unit ID: F009 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
furnace #18 shop casting controlled with a baghouse (MOR)	OAC rule 3745-17-07	Exempt pursuant to OAC rule 3745-17-07(B)(11)(c).
	OAC rule 3745-17-08(B)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust
		See A.I.2.a below.
	40 CFR Part 63, Subpart XXX	See A.I.2.b below.

2. Additional Terms and Conditions

- a. The permittee shall employ reasonably available control measures on all hot metal casting for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee currently intends to perform such activities within the #18 furnace shop, and it is recognized that there is some incidental capture of emissions with the existing taphole fume collection hoods and venting to the baghouse. Nothing in this paragraph shall prohibit the permittee from employing other control measures in lieu of or in addition to the currently employed control measures previously mentioned to ensure compliance, as long as these control measures are equivalent to or better than what the permittee committed to in its permit application.
- b. [63.1654(a)(1-3)]
The permittee must prepare, and at all times operate according to, a fugitive dust control plan that describes in detail the measures that will be put in place to control fugitive dust emissions from the individual fugitive dust emissions units at the facility. A copy of this plan must be submitted to the Ohio EPA, Southeast District Office on or before November 21, 2001.

The permittee may use existing manuals that describe the measures in place to control fugitive dust emissions units required as part of the State implementation plan or other federally enforceable requirement for particulate matter to satisfy the requirement for a fugitive dust control plan.

[63.1656(e)(1)]
Failure to have a fugitive dust control plan or failure to report deviations from the plan and take necessary corrective action would be a violation of the general duty to ensure that fugitive dust emissions units are operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions per 40 CFR Part 63.6(e)(1)(i).

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II. Operational Restrictions

1. [63.1655(b)(1)]
The permittee shall develop and implement a written maintenance plan for each air pollution control device. The plan shall be kept on record and available for the Director's (or his authorized representative's) inspection for the life of the air pollution control device or until this emissions unit is no longer subject to the provisions of Subpart XXX.

[63.1655(b)(2)]
The permittee may use the emissions unit's standard operating procedures manual or other plan, provided the alternative plan meets the requirements for the written maintenance plan and is made available for inspection when requested by the Director (or his authorized representative).

[63.1655(c)]
The procedures specified in the maintenance plan must include a preventive maintenance schedule that is consistent with good air pollution control practices for minimizing emissions and, for the baghouse, ensure that the requirements specified in sections A.III.1 through A.III.4 are met.

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III. Monitoring and/or Record Keeping Requirements

1. The monitoring and record keeping requirements for the MOR baghouse are specified in section A.III for emissions unit F012.
2. The permittee shall maintain a record of each time a control measure for this emissions unit is not implemented in accordance with the fugitive dust control plan for the facility.

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IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify each instance when a control measure, that was to be implemented in accordance with the fugitive dust control plan, was not implemented.
2. The MACT reporting requirements for the MOR baghouse are specified in section A.IV for emissions unit F012.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0684020006 Emissions Unit ID: F009 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

1. None

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II. Operational Restrictions

1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0684020006 Emissions Unit ID: F010 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
Grizzly sizing system for raw materials	OAC rule 3745-31-05(A)(3) (PTI 06-4207)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(B) and 3745-17-08(B).
	OAC rule 3745-17-07(B)	21.02 tpy of particulate emissions
	OAC rule 3745-17-08(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
		reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust
	40 CFR Part 63, Subpart XXX	See A.I.2.a below. See A.I.2.b below.

2. **Additional Terms and Conditions**

- a. The permittee shall employ reasonably available control measures for the Grizzly sizing system to ensure compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee currently intends to use wet suppression to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures in lieu of or in addition to the currently employed control measures previously mentioned to ensure compliance, as long as these control measures are equivalent to or better than what the permittee committed to in its permit application.
- b. [63.1654(a)]
The permittee must prepare, and at all times operate according to, a fugitive dust control plan that

describes in detail the measures that will be put in place to control fugitive dust emissions from the individual fugitive dust emissions units at the facility. A copy of this plan must be submitted to the Ohio EPA, Southeast District Office on or before November 21, 2001.

The permittee may use existing manuals that describe the measures in place to control fugitive dust emissions units required as part of the State implementation plan or other federally enforceable requirement for particulate matter to satisfy the requirement for a fugitive dust control plan.

[63.1656(e)(1)]

Failure to have a fugitive dust control plan or failure to report deviations from the plan and take necessary corrective action would be a violation of the general duty to ensure that fugitive dust emissions units are operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions per 40 CFR Part 63.6(e)(1)(i).

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II. Operational Restrictions

1. None

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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 fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

2. The permittee shall maintain a record of each time a control measure for this emissions unit is not implemented in accordance with the fugitive dust control plan for the facility.

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IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted 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.
2. The permittee shall submit deviation reports that identify each instance when a control measure, that was to be implemented in accordance with the fugitive dust control plan, was not implemented.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

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V. Testing Requirements

1. Compliance with the emission limitation in section A.1.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitation:
 - 20% opacity as a 3-minute average
 - Applicable Compliance Method:
 - Compliance shall be demonstrated based upon the visible particulate emission observations specified in

Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

b. Emission Limitation:

21.02 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 0.5 lb/ton by the actual production capacity, in tons/yr, times the control efficiency of (1 - 0.5), and then dividing by 2000 lbs/ton.

The particulate emission factor of 0.5 lb/ton was obtained from AP42, 4th Edition, Chapter 8, section 8.19.2, Table 2-1, dated September, 1988. No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: F010 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0684020006 Emissions Unit ID: F012 Issuance type: Title V Proposed Permit

A. **State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
metal oxygen refining process, equipped with enclosures and vented to the MOR baghouse	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08 40 CFR Part 63, Subpart XXX	See A.I.2.a and A.I.2.b below. 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the control device [63.1652(d)]
	OAC rule 3745-17-07(A)	See A.I.2.c below. Visible particulate emissions from the baghouse shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. **Additional Terms and Conditions**

- a. The emission limitation required by OAC rule 3745-17-08 is less stringent than the emission limitation required by 40 CFR Part 63.1652(d).
- b. The permittee shall employ reasonably available control measures for the metal oxygen refining process to ensure compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee currently intends to maintain the enclosures and vent the captured emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures in lieu of or in addition to the currently employed control measures previously mentioned to ensure compliance, as long as these control measures are equivalent to or better than what the permittee committed to in its permit application.
- c. [63.1654(a)(1-3)]
The permittee must prepare, and at all times operate according to, a fugitive dust control plan that describes in detail the measures that will be put in place to control fugitive dust emissions from the individual fugitive dust emissions units at the facility. A copy of this plan must be submitted to the Ohio EPA, Southeast District Office on or before November 21, 2001.

The permittee may use existing manuals that describe the measures in place to control fugitive dust emissions units required as part of the State implementation plan or other federally enforceable requirement for particulate matter to satisfy the requirement for a fugitive dust control plan.

[63.1656(e)(1)]
Failure to have a fugitive dust control plan or failure to report deviations from the plan and take

necessary corrective action would be a violation of the general duty to ensure that fugitive dust emissions units are operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions per 40 CFR Part 63.6(e)(1)(i).

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II. Operational Restrictions

1. [63.1655(b)(1)]
The permittee shall develop and implement a written maintenance plan for each air pollution control device. The plan shall be kept on record and available for the Administrator's inspection for the life of the air pollution control device or until this emissions unit is no longer subject to the provisions of Subpart XXX.
- [63.1655(b)(2)]
The permittee may use the emissions unit's standard operating procedures manual or other plan, provided the alternative plan meets the requirements for the written maintenance plan and is made available for inspection when requested by the Administrator.
- [63.1655(c)]
The procedures specified in the maintenance plan must include a preventive maintenance schedule that is consistent with good air pollution control practices for minimizing emissions and, for the baghouse, ensure that the requirements specified in sections A.III.1 through A.III.4 are met.
2. The pressure drop across the baghouse shall be maintained within the range of 3 to 12 inches of water while the emissions unit is in operation. This requirement does not apply when a compartment of the baghouse is being cleaned.

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III. Monitoring and/or Record Keeping Requirements

1. [63.1657(a)(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 the baghouse serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log.
2. [63.1657(a)(1)]
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.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log.
3. [63.1657(a)(2)(i-viii)]
In addition to the daily visible emissions observation, the permittee must conduct the following activities and maintain records of the results of the activities:
 - a. daily monitoring of the pressure drop across each baghouse cell, or across the baghouse if it is not possible to monitor each cell individually, to ensure the pressure drop is within the normal operating range identified in the baghouse maintenance plan;
 - b. weekly confirmation that the baghouse dust is being removed from the baghouse hoppers through visual inspection, or equivalent means of ensuring the proper functioning of removal mechanisms;
 - c. daily check of the compressed air supply for pulse-jet baghouses;
 - d. an appropriate methodology for monitoring cleaning cycles to ensure proper operation;
 - e. monthly check of bag cleaning mechanisms for proper functioning through visual inspection or equivalent means;
 - f. quarterly visual check of bag tension on reverse air and shaker-type baghouses to ensure that the bags are not kinked (knead or bent) or laying on their sides [such checks are not required for shaker-type baghouses using self-tensioning (spring loaded) devices];
 - g. quarterly confirmation of the physical integrity of the baghouse structure through visual inspection of the baghouse interior for air leaks; and
 - h. semiannual inspection of fans for wear, material buildup, and corrosion through visual inspection, vibration detectors, or equivalent means.
4. [63.1657(a)(4)]
As part of the maintenance plan, the permittee must develop and implement corrective action procedures to be followed in the case of the observation of visible emissions from the baghouse, or the indication through the periodic baghouse system inspections that the system is not operating properly. The permittee must initiate corrective action as soon as practicable after the occurrence of the observation or event indicating a problem.
5. [63.1657(a)(6)]
Failure to monitor or failure to take corrective action under the requirements of sections A.III.1 through A.III.3 would be a violation of the general duty to operate in a manner consistent with good air pollution control practices that minimizes emissions per 40 CFR Part 63.6(e)(1)(i).
6. The permittee shall maintain a record of each time a control measure for this emissions unit is not

implemented in accordance with the fugitive dust control plan for the facility.

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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 the baghouse serving 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.

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

2. [63.1659(b)(3)]
The permittee shall submit quarterly deviation reports that identify each instance when a control measure, that was to be implemented in accordance with the fugitive dust control plan, was not implemented.
3. [63.1659(b)(1)]
The permittee shall submit quarterly deviation reports that identify each time an inspection of the MOR baghouse system, pursuant to the maintenance plan, indicated that the baghouse system was not operating properly and adequate corrective actions were not implemented as soon as practicable.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.
5. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the MOR baghouse did not comply with the allowable range specified above.
6. [63.1659(b)(1)]
The permittee must submit quarterly reports that summarize the records maintained as part of the practices described in the maintenance plan for air pollution control devices required in section A.II.3, including an explanation of the periods when the procedures were not followed and the corrective actions taken.
7. [63.1659(b)(3)]
The permittee must submit quarterly reports that explain the periods when the procedures outlined in the fugitive dust control plan were not followed and the corrective actions taken.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
 - 20% opacity as a 3-minute average, for fugitive emissions
 - 20% opacity as a 6-minute average, for baghouse emissions
 Applicable Compliance Method:

Compliance shall be demonstrated based upon the visible particulate emission observations specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. No testing, other than the initial performance test required by 40 CFR Part 63, Subpart XXX, is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.
 - b. Emission Limitation:
 - 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the baghouse
 Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and 5D. No testing, other than the initial performance test required by 40 CFR Part 63, Subpart XXX, is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.
2. [63.1656(c)]
In accordance with 40 CFR Part 63.1656(c)(1), the permittee shall conduct an initial performance test within 180 days after November 21, 2001 to demonstrate compliance with the applicable emission standard for particulate emissions using the test method specified in 40 CFR Part 63.1656(b).
3. [63.1656(c)(3)(i)]
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 as an initial, one-time performance test.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate emissions from the baghouse.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 and 5D of 40 CFR Part 60, Appendix A.
- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the 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.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: F012 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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**

- 1. None

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: F013 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
Building 52 crusher vented to a baghouse	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08	See A.I.2.a below.
	40 CFR Part 63, Subpart XXX	0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the control device [63.1652(e)(2)]
		See A.I.2.b below.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 63, Subpart XXX.

2. Additional Terms and Conditions

- a. The permittee shall employ reasonably available control measures for the Building 52 crusher to ensure compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee currently intends to maintain the enclosures and maintain a capture system in accordance with good engineering practices that will be sufficient to minimize or eliminate visible particulate emissions at the point of capture. Nothing in this paragraph shall prohibit the permittee from employing other control measures in lieu of or in addition to the currently employed control measures previously mentioned to ensure compliance, as long as these control measures are equivalent to or better than what the permittee committed to in its permit application.
- b. [63.1654(a)]
The permittee must prepare, and at all times operate according to, a fugitive dust control plan that

describes in detail the measures that will be put in place to control fugitive dust emissions from the individual fugitive dust emissions units at the facility. A copy of this plan must be submitted to the Ohio EPA, Southeast District Office on or before November 21, 2001.

The permittee may use existing manuals that describe the measures in place to control fugitive dust emissions units required as part of the State implementation plan or other federally enforceable requirement for particulate matter to satisfy the requirement for a fugitive dust control plan.

[63.1656(e)(1)]

Failure to have a fugitive dust control plan or failure to report deviations from the plan and take necessary corrective action would be a violation of the general duty to ensure that fugitive dust emissions units are operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions per 40 CFR Part 63.6(e)(1)(i).

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II. Operational Restrictions

1. [63.1655(b)(1)]

The permittee shall develop and implement a written maintenance plan for each air pollution control device. The plan shall be kept on record and available for the Administrator's inspection for the life of the air pollution control device or until this emissions unit is no longer subject to the provisions of Subpart XXX.

[63.1655(b)(2)]

The permittee may use the emissions unit's standard operating procedures manual or other plan, provided the alternative plan meets the requirements for the written maintenance plan and is made available for inspection when requested by the Administrator.

[63.1655(c)]

The procedures specified in the maintenance plan must include a preventive maintenance schedule that is consistent with good air pollution control practices for minimizing emissions and, for the baghouse, ensure that the requirements specified in sections A.III.1 through A.III.4 are met.

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III. Monitoring and/or Record Keeping Requirements

1. [63.1657(a)(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 the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log.

2. [63.1657(a)(1)]

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.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log.

3. [63.1657(a)(2)]

In addition to the daily visible emissions observation, the permittee must conduct the following activities and maintain records of the results of the activities:

a. daily monitoring of the pressure drop across each baghouse cell, or across the baghouse if it is not possible to monitor each cell individually, to ensure the pressure drop is within the normal operating range identified in the baghouse maintenance plan;

b. weekly confirmation that the baghouse dust is being removed from the baghouse hoppers through visual inspection, or equivalent means of ensuring the proper functioning of removal mechanisms;

c. daily check of the compressed air supply for pulse-jet baghouses;

d. an appropriate methodology for monitoring cleaning cycles to ensure proper operation;

e. monthly check of bag cleaning mechanisms for proper functioning through visual inspection or equivalent means;

f. quarterly visual check of bag tension on reverse air and shaker-type baghouses to ensure that the bags are not kinked (knead or bent) or laying on their sides [such checks are not required for shaker-type baghouses using self-tensioning (spring loaded) devices];

g. quarterly confirmation of the physical integrity of the baghouse structure through visual inspection of the baghouse interior for air leaks; and

h. semiannual inspection of fans for wear, material buildup, and corrosion through visual inspection, vibration detectors, or equivalent means.

4. [63.1657(a)(4)]

As part of the maintenance plan, the permittee must develop and implement corrective action procedures to be followed in the case of the observation of visible emissions from the baghouse, or the indication through the periodic baghouse system inspections that the system is not operating properly. The permittee must initiate corrective action as soon as practicable after the occurrence of the observation or event indicating a problem.

5. [63.1657(a)(6)]
Failure to monitor or failure to take corrective action under the requirements of sections A.III.1 through A.III.3 would be a violation of the general duty to operate in a manner consistent with good air pollution control practices that minimizes emissions per 40 CFR Part 63.6(e)(1)(i).
6. The permittee shall maintain a record of each time a control measure for this emissions unit is not implemented in accordance with the fugitive dust control plan for the facility.

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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 the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the 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.

The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted 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.
2. The permittee shall submit deviation reports that identify each instance when a control measure, that was to be implemented in accordance with the fugitive dust control plan, was not implemented.
3. The permittee shall submit quarterly deviation reports that identify each time an inspection of the baghouse system, pursuant to the maintenance plan, indicated that the baghouse system was not operating properly and adequate corrective actions were not implemented as soon as practicable.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

20% opacity as a 3-minute average, for fugitive emissions
20% opacity as a 6-minute average, for stack emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the visible particulate emission observations specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. No testing, other than the initial performance test required by 40 CFR Part 63, Subpart XXX, is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.
 - b. Emission Limitation:

0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the baghouse

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5. No testing, other than the initial performance test required by 40 CFR Part 63, Subpart XXX, is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.
2. [63.1656(c)]
In accordance with 40 CFR Part 63.1656(c)(1), the permittee shall conduct an initial performance test within 180 days after November 21, 2001 to demonstrate compliance with the applicable emission standard for particulate emissions using the test method specified in 40 CFR Part 63.1656(b).
3. [63.1656(c)(3)(i)]
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 as an initial, one-time performance test.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate emissions from the baghouse.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass

emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A.

d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the 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.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0684020006 Emissions Unit ID: F013 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: F014 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
C7P crushing, sizing, and packing of materials (including crushers, screeners, mills, conveyors, transfer points and grinders) equipped with three baghouses.	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B) 40 CFR Part 63, Subpart XXX	See A.I.2.a and A.I.2.b below. 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the control device [63.1652(e)(2)]
	OAC rule 3745-17-07(A)	See A.I.2.c below. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. **Additional Terms and Conditions**

- a. The emission limitation required by OAC rule 3745-17-08 is less stringent than the emission limitation required by 40 CFR Part 63.1652(e)(2).
- b. Particulate emissions from the crushers, screeners, mills, conveyors, transfer points and grinders shall be vented to the baghouses. The permittee shall employ reasonably available control measures for the C7P crushing system to ensure compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee currently intends to maintain the enclosures and maintain a capture system in accordance with good engineering practices that will be sufficient to minimize or eliminate visible particulate emissions at the point of capture. Nothing in this paragraph shall prohibit the permittee from employing other control measures in lieu of or in addition to the currently employed control measures previously mentioned to ensure compliance, as long as these control measures are equivalent to or better than what the permittee committed to in its permit application.
- c. [63.1654(a)]
The permittee must prepare, and at all times operate according to, a fugitive dust control plan that describes in detail the measures that will be put in place to control fugitive dust emissions from the individual fugitive dust emissions units at the facility. A copy of this plan must be submitted to the Ohio EPA, Southeast District Office on or before November 21, 2001.

The permittee may use existing manuals that describe the measures in place to control fugitive dust emissions units required as part of the State implementation plan or other federally enforceable requirement for particulate matter to satisfy the requirement for a fugitive dust control plan.

[63.1656(e)(1)]

Failure to have a fugitive dust control plan or failure to report deviations from the plan and take necessary corrective action would be a violation of the general duty to ensure that fugitive dust emissions units are operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions per 40 CFR Part 63.6(e)(1)(i).

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II. Operational Restrictions

1. [63.1655(b)(1)]

The permittee shall develop and implement a written maintenance plan for each air pollution control device. The plan shall be kept on record and available for the Administrator's inspection for the life of the air pollution control device or until this emissions unit is no longer subject to the provisions of Subpart XXX.

[63.1655(b)(2)]

The permittee may use the emissions unit's standard operating procedures manual or other plan, provided the alternative plan meets the requirements for the written maintenance plan and is made available for inspection when requested by the Administrator.

[63.1655(c)]

The procedures specified in the maintenance plan must include a preventive maintenance schedule that is consistent with good air pollution control practices for minimizing emissions and, for each baghouse, ensure that the requirements specified in sections A.III.1 through A.III.4 are met.

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III. Monitoring and/or Record Keeping Requirements

1. [63.1657(a)(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 the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log.

2. [63.1657(a)(1)]

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.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log.

3. [63.1657(a)(2)]

In addition to the daily visible emissions observation, the permittee must conduct the following activities and maintain records of the results of the activities:

a. daily monitoring of the pressure drop across each baghouse cell, or across the baghouse if it is not possible to monitor each cell individually, to ensure the pressure drop is within the normal operating range identified in the baghouse maintenance plan;

b. weekly confirmation that the baghouse dust is being removed from the baghouse hoppers through visual inspection, or equivalent means of ensuring the proper functioning of removal mechanisms;

c. daily check of the compressed air supply for pulse-jet baghouses;

d. an appropriate methodology for monitoring cleaning cycles to ensure proper operation;

e. monthly check of bag cleaning mechanisms for proper functioning through visual inspection or equivalent means;

f. quarterly visual check of bag tension on reverse air and shaker-type baghouses to ensure that the bags are not kinked (knead or bent) or laying on their sides [such checks are not required for shaker-type baghouses using self-tensioning (spring loaded) devices];

g. quarterly confirmation of the physical integrity of the baghouse structure through visual inspection of the baghouse interior for air leaks; and

h. semiannual inspection of fans for wear, material buildup, and corrosion through visual inspection, vibration detectors, or equivalent means.

4. [63.1657(a)(4)]

As part of the maintenance plan, the permittee must develop and implement corrective action procedures to be followed in the case of the observation of visible emissions from the baghouse, or the indication through the periodic baghouse system inspections that the system is not operating properly. The permittee must initiate corrective action as soon as practicable after the occurrence of the observation or event indicating a problem.

5. [63.1657(a)(6)]

Failure to monitor or failure to take corrective action under the requirements of sections A.III.1 through A.III.3 would be a violation of the general duty to operate in a manner consistent with good air pollution

control practices that minimizes emissions per 40 CFR Part 63.6(e)(1)(i).

6. The permittee shall maintain a record of each time a control measure for this emissions unit is not implemented in accordance with the fugitive dust control plan for the facility.

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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 the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the 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.

The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted 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.

2. The permittee shall submit deviation reports that identify each instance when a control measure, that was to be implemented in accordance with the fugitive dust control plan, was not implemented.
3. The permittee shall submit quarterly deviation reports that identify each time an inspection of the baghouse system, pursuant to the maintenance plan, indicated that the baghouse system was not operating properly and adequate corrective actions were not implemented as soon as practicable.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

20% opacity as a 3-minute average
20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the visible particulate emission observations specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. No testing, other than the initial performance test required by 40 CFR Part 63, Subpart XXX, is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

- b. Emission Limitation:

0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the baghouse

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5. No testing, other than the initial performance test required by 40 CFR Part 63, Subpart XXX, is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

2. [63.1656(c)]
In accordance with 40 CFR Part 63.1656(c)(1), the permittee shall conduct an initial performance test within 180 days after November 21, 2001 to demonstrate compliance with the applicable emission standard for particulate emissions using the test method specified in 40 CFR Part 63.1656(b).
3. [63.1656(c)(3)(i)]
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 as an initial, one-time performance test.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate emissions from the baghouse.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A.
 - d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity,

unless otherwise specified or approved by the 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.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: F014 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0684020006 Emissions Unit ID: F016 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
fine sizing and impactor (including impactor, conveyors, transfer points, screener, storage bins, bucket elevator and mills) with enclosures and vented to a baghouse	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	See A.I.2.a and A.I.2.b below.
	40 CFR Part 63, Subpart XXX	0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the control device [63.1652(e)(2)]
		See A.I.2.c and A.I.2.d below.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. **Additional Terms and Conditions**

- a. The emission limitation required by OAC rule 3745-17-08 is less stringent than the emission limitation required by 40 CFR Part 63.1652(e)(2).
- b. Particulate emissions from the impactor, conveyors, transfer points, screener, storage bins, bucket elevator and mills shall be vented to the baghouse. The permittee shall employ reasonably available control measures for the metal powders process to ensure compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee currently intends to maintain the enclosures and maintain a capture system in accordance with good engineering practices that will be sufficient to minimize or eliminate visible particulate emissions at the point of capture. Nothing in this paragraph shall prohibit the permittee from employing other control measures in lieu of or in addition to the currently employed control measures previously mentioned to ensure compliance, as long as these control measures are equivalent to or better than what the permittee committed to in its permit application.
- c. [63.1654(a)]
The permittee must prepare, and at all times operate according to, a fugitive dust control plan that describes in detail the measures that will be put in place to control fugitive dust emissions from the individual fugitive dust emissions units at the facility. A copy of this plan must be submitted to the Ohio EPA, Southeast District Office on or before November 21, 2001.

The permittee may use existing manuals that describe the measures in place to control fugitive dust emissions units required as part of the State implementation plan or other federally enforceable requirement for particulate matter to satisfy the requirement for a fugitive dust control plan.

[63.1656(e)(1)]

Failure to have a fugitive dust control plan or failure to report deviations from the plan and take necessary corrective action would be a violation of the general duty to ensure that fugitive dust emissions units are operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions per 40 CFR Part 63.6(e)(1)(i).

- d. This emissions unit consists of 2 fine sizing and impactor systems (#5 and #6). Both systems emit directly to the atmosphere. System #5 vents to a baghouse and is currently in operation. System #6 vents to a wet scrubber and is not expected to operate during the life of this permit. The particulate emission limitation of 0.030 gr/dscf applies to systems #5 and #6, combined.

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II. Operational Restrictions

1. [63.1655(b)(1)]

The permittee shall develop and implement a written maintenance plan for each air pollution control device. The plan shall be kept on record and available for the Administrator's inspection for the life of the air pollution control device or until this emissions unit is no longer subject to the provisions of Subpart XXX.

[63.1655(b)(2)]

The permittee may use the emissions unit's standard operating procedures manual or other plan, provided the alternative plan meets the requirements for the written maintenance plan and is made available for inspection when requested by the Administrator.

[63.1655(c)]

The procedures specified in the maintenance plan must include a preventive maintenance schedule that is consistent with good air pollution control practices for minimizing emissions and, for the baghouse, ensure that the requirements specified in sections A.III.1 through A.III.4 are met.

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III. Monitoring and/or Record Keeping Requirements

1. [63.1657(a)(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 the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log.

2. [63.1657(a)(1)]

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.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log.

3. [63.1657(a)(2)]

In addition to the daily visible emissions observation, the permittee must conduct the following activities and maintain records of the results of the activities:

a. daily monitoring of the pressure drop across each baghouse cell, or across the baghouse if it is not possible to monitor each cell individually, to ensure the pressure drop is within the normal operating range identified in the baghouse maintenance plan;

b. weekly confirmation that the baghouse dust is being removed from the baghouse hoppers through visual inspection, or equivalent means of ensuring the proper functioning of removal mechanisms;

c. daily check of the compressed air supply for pulse-jet baghouses;

d. an appropriate methodology for monitoring cleaning cycles to ensure proper operation;

e. monthly check of bag cleaning mechanisms for proper functioning through visual inspection or equivalent means;

f. quarterly visual check of bag tension on reverse air and shaker-type baghouses to ensure that the bags are not kinked (knead or bent) or laying on their sides [such checks are not required for shaker-type baghouses using self-tensioning (spring loaded) devices];

g. quarterly confirmation of the physical integrity of the baghouse structure through visual inspection of the baghouse interior for air leaks; and

h. semiannual inspection of fans for wear, material buildup, and corrosion through visual inspection, vibration detectors, or equivalent means.

4. [63.1657(a)(4)]

As part of the maintenance plan, the permittee must develop and implement corrective action procedures to be followed in the case of the observation of visible emissions from the baghouse, or the indication through the periodic baghouse system inspections that the system is not operating properly. The permittee must initiate corrective action as soon as practicable after the occurrence of the observation or event indicating a problem.

5. [63.1657(a)(6)]

Failure to monitor or failure to take corrective action under the requirements of sections A.III.1 through A.III.3 would be a violation of the general duty to operate in a manner consistent with good air pollution control practices that minimizes emissions per 40 CFR Part 63.6(e)(1)(i).

6. The permittee shall maintain a record of each time a control measure for this emissions unit is not implemented in accordance with the fugitive dust control plan for the facility.

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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 the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the 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.

The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted 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.

2. The permittee shall submit deviation reports that identify each instance when a control measure, that was to be implemented in accordance with the fugitive dust control plan, was not implemented.
3. The permittee shall submit quarterly deviation reports that identify each time an inspection of the baghouse system, pursuant to the maintenance plan, indicated that the baghouse system was not operating properly and adequate corrective actions were not implemented as soon as practicable.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

20% opacity as a 3-minute average
20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the visible particulate emission observations specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. No testing, other than the initial performance test required by 40 CFR Part 63, Subpart XXX, is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

- b. Emission Limitation:

0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the baghouse

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5. No testing, other than the initial performance test required by 40 CFR Part 63, Subpart XXX, is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

2. [63.1656(c)]
In accordance with 40 CFR Part 63.1656(c)(1), the permittee shall conduct an initial performance test within 180 days after November 21, 2001 to demonstrate compliance with the applicable emission standard for particulate emissions using the test method specified in 40 CFR Part 63.1656(b).
3. [63.1656(c)(3)(i)]
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 as an initial, one-time performance test.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate emissions from the baghouse.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A.

d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the 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.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: F016 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0684020006 Emissions Unit ID: F017 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Simplex system (mix, milling, furnace and packing system), including, conveyors, transfer points, crushers, screens, surge bins, storage bins and bucket elevators, vented to 22 baghouses and 1 wet collector.	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the control device or no visible emissions whichever is less stringent.
	OAC rule 3745-17-07(A)	See A.I.2.a below. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-17-08.

2. **Additional Terms and Conditions**

- a. Particulate emissions from the conveyors, transfer points, crushers, screens, surge bins, storage bins, and bucket elevators shall be vented to the baghouses or the wet collector. The permittee shall employ reasonably available control measures for the Simplex system to ensure compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee currently intends to maintain the enclosures and maintain a capture system in accordance with good engineering practices that will be sufficient to minimize or eliminate visible particulate emissions at the point of capture. Nothing in this paragraph shall prohibit the permittee from employing other control measures in lieu of or in addition to the currently employed control measures previously mentioned to ensure compliance, as long as these control measures are equivalent to or better than what the permittee committed to in its permit application.

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II. **Operational Restrictions**

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the 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.

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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 the stacks serving 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.

The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted 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.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the visible particulate emission observations specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.
 - b. Emission Limitation:

0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the baghouse or no visible emissions which ever is less stringent.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and 22. No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: F017 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0684020006 Emissions Unit ID: P018 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
vacuum furnace 50	OAC rule 3745-31-05 (PTI 06-2071)	Carbon monoxide (CO) emissions shall not exceed 2.8 lbs/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	Particulate emissions shall not exceed 1.33 lbs/hr.

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

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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 the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the 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.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
 - 20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

b. Emission Limitation:

1.33 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in Test Methods 1 through 5 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

c. Emission Limitation:

2.8 lbs/hr of CO

Applicable Compliance Method:

Compliance may be demonstrated based upon a CO emission factor of 2.8 lbs/hr. The CO emission factor was specified as part of the permittee's permit to install application.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the procedures specified in Test Method 10, 40 CFR Part 60, Appendix A. No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0684020006 Emissions Unit ID: P018 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0684020006 Emissions Unit ID: P020 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
manganese metal process (EIMN) (including conveyors, screener, storage bin, dryer and bagger) vented to 2 baghouses	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	See A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

- a. Particulate emissions from the conveyors, screener, storage bin, dryer and bagger shall be vented to the baghouses. The permittee shall employ hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control particulate emissions such that the collection efficiency is sufficient to minimize or eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design. The control equipment shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust stack(s), whichever is less stringent.
- b. The visible particulate emission limitation required by OAC rule 3745-17-07(A) shall apply whenever the facility seeks to comply with the requirements of OAC rule 3745-17-08(B) by meeting the particulate emission limitation of 0.030 gr/dscf.

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II. **Operational Restrictions**

1. None

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

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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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 the stacks serving 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.

The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted 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.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.
 - b. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

c. Emission Limitation:

0.030 gr/dscf of particulate emissions or no visible particulate emissions, whichever is less stringent

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 or the procedures specified in 40 CFR Part 60, Appendix A, Method 22, as applicable. No testing is specifically required by this permit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: P020 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0684020006 Emissions Unit ID: P022 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
electrolytic chromium process (including a plate blaster and packer) vented to 2 baghouses	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	See A.I.2.a and A.I.2.b below.

2. **Additional Terms and Conditions**

- a. Particulate emissions from the plate blaster and packer shall be vented to the baghouses. The permittee shall employ hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control particulate emissions such that the collection efficiency is sufficient to minimize or eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design. The control equipment shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust stack(s), whichever is less stringent.
- b. The visible particulate emission limitation required by OAC rule 3745-17-07(A) shall apply whenever the facility seeks to comply with the requirements of OAC rule 3745-17-08(B) by meeting the particulate emission limitation of 0.030 gr/dscf.

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II. **Operational Restrictions**

1. None

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

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;

- b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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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 the stacks serving 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.

The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted 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.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

b. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

c. Emission Limitation:

0.030 gr/dscf of particulate emissions or no visible particulate emissions, whichever is less stringent

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 or the procedures specified in 40 CFR Part 60, Appendix A, Method 22, as applicable. No testing is specifically required by this permit but, if appropriate, may be requested

pursuant to OAC rule 3745-15-04.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0684020006 Emissions Unit ID: P022 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0684020006 Emissions Unit ID: P025 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
EM briquetting, vented to a cyclone	OAC rule 3745-31-05(A)(3) (PTI 06-1822)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(B) and 3745-17-08.
	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08	0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the control device or no visible emissions whichever is less stringent.
	OAC rule 3745-17-07(A)	See A.I.2.a below. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-17-08.

2. Additional Terms and Conditions

- a. The permittee shall employ reasonably available control measures for the EM Briquetting process to ensure compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee currently intends to maintain the enclosures and maintain a capture system in accordance with good engineering practices that will be sufficient to minimize or eliminate visible particulate emissions at the point of capture. Nothing in this paragraph shall prohibit the permittee from employing other control measures in lieu of or in addition to the currently employed control measures previously mentioned to ensure compliance, as long as these control measures are equivalent to or better than what the permittee committed to in its permit application.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and

- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the 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.

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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 the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the 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.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted 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.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the visible particulate emission observations specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.
 - b. Emission Limitation:

0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the cyclone or no visible emissions whichever is less stringent

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and 22. No testing is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0684020006 Emissions Unit ID: P025 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: P901 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 arc furnace #1, vented to a baghouse for control of tapping emissions and to a venturi wet scrubber for control of charging and melting emissions	OAC rule 3745-17-07(B)(3)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 6-minute average, except during blowing taps, poling, and oxygen lancing of the tap hole.
	OAC rule 3745-17-08	See A.I.2.a below.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	See A.I.2.b below.
	40 CFR Part 63, Subpart XXX	[63.1652(b)] The permittee shall not cause to be discharged into the atmosphere any exhaust gases (including primary and tapping) containing particulate matter in excess of 35.9 lbs/hr when producing silicomanganese with a furnace load greater than 25 MW.
		[63.1652(b)] The permittee shall not cause to be discharged into the atmosphere any exhaust gases (including primary and tapping) containing particulate matter in excess of 27.2 lbs/hr when producing silicomanganese with a furnace load less than or equal to 25 MW.
		[63.1652(b)] The permittee shall not cause to be discharged into the atmosphere any exhaust gases (including primary and tapping) containing particulate matter in excess of 29.8 lbs/hr when producing ferromanganese with a furnace load greater than 22 MW.
		[63.1652(b)] The permittee shall not cause to be discharged into the atmosphere any exhaust gases (including primary and tapping) containing particulate matter in excess of 21.7 lbs/hr when producing ferromanganese with a furnace load less than or equal to 22 MW.
		See A.I.2.c below.
		[63.1653] Visible particulate emissions from the shop roof monitor due solely to operations of the submerged arc furnace shall not exceed 20% opacity for more than one 6-minute period during any 60-minute period with the following exceptions: [63.1653(a)] Visible particulate emissions from the shop due solely to operation of a semi-closed submerged arc furnace, may exceed 20% opacity, measured as a 6-minute average, one time during any 60-minute period, so long as the emissions never exceed 60% opacity, measured as a 6-minute average. [63.1653(b)] Blowing taps, poling and oxygen lancing of the tap hole; burndowns associated with electrode measurements; and maintenance activities associated with submerged arc furnaces and casting operations are exempt from the opacity standard.

2. **Additional Terms and Conditions**

- a. The permittee shall employ reasonable available control measures on all charging, melting, and tapping operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. The capture efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design. Nothing in this paragraph shall prohibit the permittee from employing additional measures to ensure compliance.
- b. The particulate emission limitation required by OAC rule 3745-17-11 is less stringent than the particulate emission limitations required by 40 CFR Part 63, Subpart XXX.
- c. [63.1654(a)]
The permittee must prepare, and at all times operate according to, a fugitive dust control plan that describes in detail the measures that will be put in place to control fugitive dust emissions from the individual fugitive dust emissions units at the facility. A copy of this plan must be submitted to the Ohio EPA, Southeast District Office on or before November 21, 2001.

The permittee may use existing manuals that describe the measures in place to control fugitive dust emissions units required as part of the State implementation plan or other federally enforceable requirement for particulate matter to satisfy the requirement for a fugitive dust control plan.

[63.1656(e)(1)]

Failure to have a fugitive dust control plan or failure to report deviations from the plan and take necessary corrective action would be a violation of the general duty to ensure that fugitive dust emissions units are operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions per 40 CFR Part 63.6(e)(1)(i).

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II. Operational Restrictions

1. The pressure drop across the venturi scrubber shall be continuously maintained at a value of not less than 40 inches of water at all times while the emissions unit is in operation.
2. The pressure drop across the baghouse shall be maintained within the range of 5 to 15 inches of water while the emissions unit is in operation.
3. [63.1655(b)(1)]
The permittee shall develop and implement a written maintenance plan for each air pollution control device. The plan shall be kept on record and available for the Administrator's inspection for the life of the air pollution control device or until this emissions unit is no longer subject to the provisions of Subpart XXX.

[63.1655(b)(2)]
The permittee may use the emissions unit's standard operating procedures manual or other plan, provided the alternative plan meets the requirements for the written maintenance plan and is made available for inspection when requested by the Administrator.

[63.1655(c)]
The procedures specified in the maintenance plan must include a preventive maintenance schedule that is consistent with good air pollution control practices for minimizing emissions and, for the baghouse, ensure that the requirements specified in sections A.III.1 and A.III.2 are met.
4. The permittee shall maintain the capture system fan motor amperes, flow rate, and/or damper positions within the ranges and/or positions, as appropriate, that were recorded during the initial performance test that demonstrated compliance.

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III. Monitoring and/or Record Keeping Requirements

1. [63.1657(a)(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 the stacks and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log.
2. [63.1657(a)(2)]
In addition to the daily visible emissions observation, the permittee must conduct the following activities and maintain records of the results of these activities:
 - a. daily monitoring of the pressure drop across each baghouse cell, or across the baghouse if it is not possible to monitor each cell individually, to ensure the pressure drop is within the normal operating range identified in the baghouse maintenance plan;
 - b. weekly confirmation that the baghouse dust is being removed from the baghouse hoppers through visual inspection, or equivalent means of ensuring the proper functioning of removal mechanisms;
 - c. daily check of the compressed air supply for pulse-jet baghouses;
 - d. an appropriate methodology for monitoring cleaning cycles to ensure proper operation;
 - e. monthly check of bag cleaning mechanisms for proper functioning through visual inspection or equivalent means;
 - f. quarterly visual check of bag tension on reverse air and shaker-type baghouses to ensure that the bags are not kinked (knead or bent) or laying on their sides [such checks are not required for shaker-type baghouses using self-tensioning (spring loaded) devices];
 - g. quarterly confirmation of the physical integrity of the baghouse structure through visual inspection of the baghouse interior for air leaks; and
 - h. semiannual inspection of fans for wear, material buildup, and corrosion through visual inspection, vibration detectors, or equivalent means.
3. [63.1655(d)]
The permittee shall perform monthly inspections of the equipment that is important to the performance of the furnace capture system. This inspection must include an examination of the physical condition of the equipment, suitable for detecting holes in ductwork or hoods, flow constrictions in ductwork due to dents or accumulated dust, and operational status of flow rate controllers. Any deficiencies must be recorded and proper maintenance and repairs performed.

4. [63.1657(c)(1) through (c)(3)]
The permittee shall comply with one of the following monitoring options (the selected option must be consistent with that selected during the initial performance test required in section A.V):
- check and record the control system fan motor amperes and capture system damper positions once per shift;
 - install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate through each separately ducted hood; or
 - install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate at the inlet of the air pollution control device and check and record the capture system damper positions once per shift.
- [63.1657(c)(4)]
If a flow rate monitoring device is employed, it must be installed in an appropriate location in the exhaust duct such that reproducible flow rate monitoring will result and the flow rate monitoring device must have an accuracy of plus or minus 10% over its normal operating range and be calibrated according to the manufacturer's instructions.
- [63.1657(c)(5)]
The Ohio EPA, Southeast District Office may require the permittee to demonstrate the accuracy of the monitoring device(s) relative to the requirements specified in 40 CFR Part 60, Appendix A, Methods 1 and 2.
- [63.1657(c)(6)]
Failure to maintain the appropriate capture system parameters (fan motor amperes, flow rate, and/or damper positions) establishes the need to initiate corrective action as soon as practicable after the monitoring excursion in order to minimize excess emissions.
5. [63.1657(b)(3) and (c)(7)]
Failure to monitor or failure to take corrective action under the requirements of sections A.III.1, A.III.2, and A.III.4 is a violation of the general duty to operate in a manner consistent with good air pollution control practices that minimizes emissions per 40 CFR Part 63.6(e)(1)(i).
6. [63.10(b)(2)]
The permittee must maintain records, for 5 years from the date of each record, of the following information:
- the occurrence and duration of each startup, shutdown, or malfunction of operation;
 - the occurrence and duration of each malfunction of the source or air pollution control equipment;
 - all maintenance performed on the air pollution control equipment;
 - 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) when such actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
 - 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) are consistent with the procedures specified in such plan (this information can be recorded in a checklist or similar form);
 - 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;
 - all results of initial or subsequent performance tests;
 - all documentation supporting initial notifications and notifications of compliance status; and
 - any applicability determination, including supporting analyses.
7. [63.1657(b)(1)]
The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the wet 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). The permittee shall monitor the pressure drop across the venturi scrubber at least every 5 minutes and record the average hourly pressure drop. Measurement of an average hourly pressure drop less than the pressure drop operating parameter limit established during a successful compliance demonstration would be a violation of the applicable emission standard, unless the excursion in the pressure drop is due to a malfunction.
8. [63.1657(b)(2)]
As part of the maintenance plan, the permittee must develop and implement corrective action procedures to be followed in the case of the observation of visible emissions from the baghouse, or the indication through the periodic baghouse system inspections that the system is not operating properly. The permittee must initiate corrective action as soon as practicable after the occurrence of the observation or event indicating a problem.
9. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

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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 the stacks serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed from the from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or 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.
2. [63.1659(b)(2)]
The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the venturi scrubber was not maintained at or above the required level.
3. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
4. [63.1659(b)(1)]
The permittee must submit quarterly reports that summarize the records maintained as part of the practices described in the maintenance plan for air pollution control devices required in section A.II.3, including an explanation of the periods when the procedures were not followed and the corrective actions taken.
5. [63.1659(b)(3)]
The permittee must submit quarterly reports that explain the periods when the procedures outlined in the fugitive dust control plan were not followed and the corrective actions taken.
6. [63.1659(b)(4)]
The permittee must submit quarterly reports that summarize the capture system monitoring parameter excursions measured in accordance with the requirements specified in section A.III.4 and the corrective actions taken.
7. [63.1659(b)(2)]
The permittee shall submit quarterly reports that identify each day that the observations required under section A.III.2 were not performed and each day that any corrective measure required to be taken was not performed.

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V. Testing Requirements

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

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the requirements specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.
 - b. Emission Limitation:

35.9 lbs/hr of particulate emissions when producing silicomanganese with a furnace load greater than 25 MW

27.2 lbs/hr of particulate emissions when producing silicomanganese with a furnace load less than or equal to 25 MW

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.
 - c. Emission Limitation:

29.8 lbs/hr of particulate emissions when producing ferromanganese with a furnace load greater than 22 MW

21.7 lbs/hr of particulate emissions when producing ferromanganese with a furnace load less than or equal to 22 MW

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

2. [63.1656(c)(1)]
In accordance with 40 CFR Part 63.1656(c)(1), the permittee shall conduct an initial performance test for each air pollution control device and/or vent stack to establish compliance with the particulate emission limitation specified in 40 CFR Part 63.1652(b) and the visible particulate emission limitation specified in 40 CFR Part 63.1653.
3. [63.1656(c)(2) and (c)(3)(ii)]
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted on an annual basis.
 - The emission testing shall be conducted to demonstrate compliance with the allowable particulate emission rates for silicomanganese and ferromanganese.
 - The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A.
 - The tests 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.
 - The permittee shall conduct the performance test such that at least one tapping period, or at least 20 minutes of a tapping period, whichever is less, is included in at least two of the three runs. The sampling time for each run shall be at least as long as three times the average tapping period of the tested furnace, but no less than 60 minutes.
 - The sample volume for each run shall be at least 0.9 dscm (30 dscf).
 - The permittee shall establish, as a site-specific operating parameter, the lowest average pressure drop of the venturi scrubber on any individual complying run in the 3 runs constituting any compliant test. The pressure drop shall be monitored at least every 5 minutes during the test and hourly averages recorded.
 - The pressure drop across the baghouse shall be monitored and recorded at least every 5 minutes during the test.
 - The permittee may augment the data obtained pursuant to sections A.V.3.g and A.V.3.h by conducting multiple performance tests to establish a range of compliant operating parameter values. The lowest value of the range established in section A.V.3.g would be selected as the operating parameter monitoring value. The use of historic compliance data may be used to establish the compliant operating parameter value if the previous values were recorded during performance tests using the same test methods specified in 40 CFR Part 63, Subpart XXX and established as required in section A.V.3.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 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.
4. [63.1656(c)(2) and (d)]
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted on an annual basis.
 - The emission testing shall be conducted to demonstrate compliance with the visible particulate emission limitation for silicomanganese and ferromanganese production.
 - The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A for a minimum of 60 minutes.
 - The tests 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.
 - The permittee shall conduct opacity observations of the shop building to demonstrate compliance with the applicable opacity standards according to 40 CFR Part 63.6(h)(5), which addresses the conduct of opacity or visible emission observations.
 - In conducting the opacity observations of the shop building, the observer must limit the field of view to the area of the shop building roof monitor that corresponds to the placement of the affected submerged arc furnace(s).
 - When demonstrating initial compliance with the shop building opacity standard, as required in section A.V.2, the permittee shall simultaneously establish parameter values for one of the following:
 - the control system fan motor amperes and all capture system damper positions;

- ii. the total volumetric flow rate to the air pollution control device and all capture system damper positions; or
- iii. the volumetric flow rate through each separately ducted hood that comprises the capture system.
- h. The permittee may petition the Ohio EPA, Southeast District Office to reestablish these parameters whenever it can be satisfactorily demonstrated that the submerged arc furnace operating conditions upon which the parameters were previously established are no longer applicable. The values of these parameters determined during the most recent demonstration of compliance shall be maintained at the appropriate level for each applicable period.

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.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: P901 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: P908 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 arc furnace #12, vented to a venturi wet scrubber for control of tapping, charging, and melting emissions	OAC rule 3745-17-07(B)(3)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 6-minute average, except during blowing taps, poling, and oxygen lancing of the tap hole.
	OAC rule 3745-17-08	See A.I.2.a below.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	See A.I.2.b below.
	40 CFR 63, Subpart XXX	When processing high carbon ferrochromium, particulate emissions shall not exceed 39 lbs/hr. [63.1652(b)] The permittee shall not cause to be discharged into the atmosphere any exhaust gases (including primary and tapping) containing particulate matter in excess of 35.9 lbs/hr when producing silicomanganese with a furnace load greater than 25 MW. [63.1652(b)] The permittee shall not cause to be discharged into the atmosphere any exhaust gases (including primary and tapping) containing particulate matter in excess of 27.2 lbs/hr when producing silicomanganese with a furnace load less than or equal to 25 MW. [63.1652(b)] The permittee shall not cause to be discharged into the atmosphere any exhaust gases (including primary and tapping) containing particulate matter in excess of 29.8 lbs/hr when producing ferromanganese with a furnace

load greater than 22 MW.

[63.1652(b)]

The permittee shall not cause to be discharged into the atmosphere any exhaust gases (including primary and tapping) containing particulate matter in excess of 21.7 lbs/hr when producing ferromanganese with a furnace load less than or equal to 22 MW.

See A.I.2.c below.

[63.1653]

Visible particulate emissions from the shop roof monitor due solely to operations of the submerged arc furnace shall not exceed 20% opacity for more than one 6-minute period during any 60-minute period with the following exceptions:

[63.1653(a)]

Visible particulate emissions from the shop due solely to operation of a semi-closed submerged arc furnace, may exceed 20% opacity, measured as a 6-minute average, one time during any 60-minute period, so long as the emissions never exceed 60% opacity, measured as a 6-minute average.

[63.1653(b)]

Blowing taps, poling and oxygen lancing of the tap hole; burndowns associated with electrode measurements; and maintenance activities associated with submerged arc furnaces and casting operations are exempt from the opacity standard.

2. Additional Terms and Conditions

- a. The permittee shall employ reasonable available control measures on all charging, melting, and tapping operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. The capture efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design. Nothing in this paragraph shall prohibit the permittee from employing additional measures to ensure compliance.
- b. The particulate emission limitations required by OAC rule 3745-17-11 are less stringent than the particulate emission limitations required by 40 CFR Part 63, Subpart XXX.

c. [63.1654(a)]

The permittee must prepare, and at all times operate according to, a fugitive dust control plan that describes in detail the measures that will be put in place to control fugitive dust emissions from the individual fugitive dust emissions units at the facility. A copy of this plan must be submitted to the Ohio EPA, Southeast District Office on or before November 21, 2001.

The permittee may use existing manuals that describe the measures in place to control fugitive dust emissions units required as part of the State implementation plan or other federally enforceable requirement for particulate matter to satisfy the requirement for a fugitive dust control plan.

[63.1656(e)(1)]

Failure to have a fugitive dust control plan or failure to report deviations from the plan and take necessary corrective action would be a violation of the general duty to ensure that fugitive dust emissions units are operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions per 40 CFR Part 63.6(e)(1)(i).

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II. Operational Restrictions

1. The pressure drop across the venturi scrubber shall be continuously maintained at a value of not less than 40 inches of water at all times while the emissions unit is in operation.
2. [63.1655(b)(1)]
The permittee shall develop and implement a written maintenance plan for each air pollution control device. The plan shall be kept on record and available for the Administrator's inspection for the life of the air pollution control device or until this emissions unit is no longer subject to the provisions of Subpart XXX.

[63.1655(b)(2)]
The permittee may use the emissions unit's standard operating procedures manual or other plan, provided the alternative plan meets the requirements for the written maintenance plan and is made available for inspection when requested by the Administrator.

[63.1655(c)]
The procedures specified in the maintenance plan must include a preventive maintenance schedule that is consistent with good air pollution control practices for minimizing emissions.
3. The permittee shall maintain the capture system fan motor amperes, flow rate, and/or damper positions within

the ranges and/or positions, as appropriate, that were recorded during the initial performance test that demonstrated compliance.

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

1. [63.1657(a)(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 the stacks and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log.
2. [63.1655(d)]

The permittee shall perform monthly inspections of the equipment that is important to the performance of the furnace capture system. This inspection must include an examination of the physical condition of the equipment, suitable for detecting holes in ductwork or hoods, flow constrictions in ductwork due to dents or accumulated dust, and operational status of flow rate controllers. Any deficiencies must be recorded and proper maintenance and repairs performed.
3. [63.1657(c)(1) through (c)(3)]

The permittee shall comply with one of the following monitoring options (the selected option must be consistent with that selected during the initial performance test required in section A.V):

 - a. check and record the control system fan motor amperes and capture system damper positions once per shift;
 - b. install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate through each separately ducted hood; or
 - c. install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate at the inlet of the air pollution control device and check and record the capture system damper positions once per shift.

[63.1657(c)(4)]
If a flow rate monitoring device is employed, it must be installed in an appropriate location in the exhaust duct such that reproducible flow rate monitoring will result and the flow rate monitoring device must have an accuracy of plus or minus 10% over its normal operating range and be calibrated according to the manufacturer's instructions.

[63.1657(c)(5)]
The Ohio EPA, Southeast District Office may require the permittee to demonstrate the accuracy of the monitoring device(s) relative to the requirements specified in 40 CFR Part 60, Appendix A, Methods 1 and 2.

[63.1657(c)(6)]
Failure to maintain the appropriate capture system parameters (fan motor amperes, flow rate, and/or damper positions) establishes the need to initiate corrective action as soon as practicable after the monitoring excursion in order to minimize excess emissions.
4. [63.1657(b)(3) and (c)(7)]

Failure to monitor or failure to take corrective action under the requirements of sections A.III.1 and A.III.4 is a violation of the general duty to operate in a manner consistent with good air pollution control practices that minimizes emissions per 40 CFR Part 63.6(e)(1)(i).
5. [63.10(b)(2)]

The permittee must maintain records, for 5 years from the date of each record, of the following information:

 - a. the occurrence and duration of each startup, shutdown, or malfunction of operation;
 - b. the occurrence and duration of each malfunction of the source or air pollution control equipment;
 - c. all maintenance performed on the air pollution control equipment;
 - d. 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) when such actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
 - 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) are consistent with the procedures specified in such plan (this information can be recorded in a checklist or similar form);
 - 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;
 - g. all results of initial or subsequent performance tests;
 - h. all documentation supporting initial notifications and notifications of compliance status; and
 - i. any applicability determination, including supporting analyses.

6. [63.1657(b)(1)]
The permittee shall properly operate and maintain equipment to monitor the pressure drop across the wet 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). The permittee shall monitor the pressure drop across the venturi scrubber at least every 5 minutes and record the average hourly pressure drop. Measurement of an average hourly pressure drop less than the pressure drop operating parameter limit established during a successful compliance demonstration would be a violation of the applicable emission standard, unless the excursion in the pressure drop is due to a malfunction.

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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 the stacks serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed from the from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or 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.
2. [63.1659(b)(2)]
The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the venturi scrubber was not maintained at or above the required level.
3. [63.1659(b)(1)]
The permittee must submit quarterly reports that summarize the records maintained as part of the practices described in the maintenance plan for air pollution control devices required in section A.II.2, including an explanation of the periods when the procedures were not followed and the corrective actions taken.
4. [63.1659(b)(3)]
The permittee must submit quarterly reports that explain the periods when the procedures outlined in the fugitive dust control plan were not followed and the corrective actions taken.
5. [63.1659(b)(4)]
The permittee must submit quarterly reports that summarize the capture system monitoring parameter excursions measured in accordance with the requirements specified in section A.III.3 and the corrective actions taken.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the requirements specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.
 - b. Emission Limitation:

35.9 lbs/hr of particulate emissions when producing silicomanganese with a furnace load greater than 25 MW
27.2 lbs/hr of particulate emissions when producing silicomanganese with a furnace load less than or equal to 25 MW

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.
 - c. Emission Limitation:

29.8 lbs/hr of particulate emissions when producing ferromanganese with a furnace load greater than 22 MW
21.7 lbs/hr of particulate emissions when producing ferromanganese with a furnace load less than or equal to 22 MW

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A,

- Methods 1 through 5.
- d. Emission Limitation:
- 39.0 lbs/hr of particulate emissions when producing high carbon ferrochromium
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.
2. [63.1656(c)(1)]
In accordance with 40 CFR Part 63.1656(c)(1), the permittee shall conduct an initial performance test for each air pollution control device and/or vent stack to establish compliance with the particulate emission limitation specified in 40 CFR Part 63.1652(b) and the visible particulate emission limitation specified in 40 CFR Part 63.1653.
3. [63.1656(c)(2) and (c)(3)(ii)]
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 on an annual basis and whenever production is switched from ferromanganese to silicomanganese, unless the SEDO agrees that weather conditions prohibit such testing during silicomanganese production. Emission testing during silicomanganese production shall only be required once per calendar year.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable particulate emission rate.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A.
- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. The permittee shall conduct the performance test such that at least one tapping period, or at least 20 minutes of a tapping period, whichever is less, is included in at least two of the three runs. The sampling time for each run shall be at least as long as three times the average tapping period of the tested furnace, but no less than 60 minutes.
- f. The sample volume for each run shall be at least 0.9 dscm (30 dscf).
- g. The permittee shall establish, as a site-specific operating parameter, the lowest average pressure drop of the venturi scrubber on any individual complying run in the 3 runs constituting any compliant test. The pressure drop shall be monitored at least every 5 minutes during the test and hourly averages recorded.
- h. The permittee may augment the data obtained under section A.V.3.g by conducting multiple performance tests to establish a range of compliant operating parameter values. The lowest value of the range established in section A.V.3.g would be selected as the operating parameter monitoring value. The use of historic compliance data may be used to establish the compliant operating parameter value if the previous values were recorded during performance tests using the same test methods specified in 40 CFR Part 63, Subpart XXX and established as required in section A.V.3.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 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.
4. [63.1656(c)(2) and (d)]
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 on an annual basis and whenever production is switched from ferromanganese to silicomanganese, unless the SEDO agrees that weather conditions prohibit such testing during silicomanganese production. Emission testing during silicomanganese production shall only be required once per calendar year.
- b. The emission testing shall be conducted to demonstrate compliance with the visible particulate emission limitation.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A for a minimum of 60 minutes.

d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The permittee shall conduct opacity observations of the shop building to demonstrate compliance with the applicable opacity standards according to 40 CFR Part 63.6(h)(5), which addresses the conduct of opacity or visible emission observations.

f. In conducting the opacity observations of the shop building, the observer must limit the field of view to the area of the shop building roof monitor that corresponds to the placement of the affected submerged arc furnace(s).

g. When demonstrating initial compliance with the shop building opacity standard, as required in section A.V.2, the permittee shall simultaneously establish parameter values for one of the following:

- i. the control system fan motor amperes and all capture system damper positions;
- ii. the total volumetric flow rate to the air pollution control device and all capture system damper positions; or
- iii. the volumetric flow rate through each separately ducted hood that comprises the capture system.

h. The permittee may petition the Ohio EPA, Southeast District Office to reestablish these parameters whenever it can be satisfactorily demonstrated that the submerged arc furnace operating conditions upon which the parameters were previously established are no longer applicable. The values of these parameters determined during the most recent demonstration of compliance shall be maintained at the appropriate level for each applicable period.

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.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: P908 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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**

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: P909 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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 arc furnace #18, vented to the MOR baghouse for control of tapping emissions and to a venturi wet scrubber for control of charging and melting emissions	OAC rule 3745-31-05(A)(3) (PTI 06-4128)	Particulate emissions shall not exceed 24.7 lbs/hr.
	OAC rule 3745-17-07(B)(3)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-07(B)(3), 3745-17-08, 3745-17-11, and 40 CFR Part 63, Subpart XXX. Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 6-minute average, except during blowing taps, poling, and oxygen lancing of the tap hole.
	OAC rule 3745-17-08 OAC rule 3745-17-07(A)	See A.I.2.a below. Visible particulate emissions from the baghouse and the venturi wet scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11 40 CFR Part 63, Subpart XXX	See A.I.2.b below. [63.1652(c)]

The permittee shall not cause to be discharged into the atmosphere any exhaust gases (including primary, tapping, and vent stacks) containing particulate matter in excess of 24.7 lbs/hr when producing ferromanganese.

See A.I.2.c below.

[63.1653]

Visible particulate emissions from the shop roof monitor due solely to operations of the submerged arc furnace shall not exceed 20% opacity for more than one 6-minute period during any 60-minute period with the following exceptions:

[63.1653(a)]

Visible particulate emissions from the shop due solely to operation of a semi-closed submerged arc furnace, may exceed 20% opacity, measured as a 6-minute average, one time during any 60-minute period, so long as the emissions never exceed 60% opacity, measured as a 6-minute average.

[63.1653(b)]

Blowing taps, poling and oxygen lancing of the tap hole; burndowns associated with electrode measurements; and maintenance activities associated with submerged arc furnaces and casting operations are exempt from the opacity standard.

2. Additional Terms and Conditions

- a. The permittee shall employ reasonable available control measures on all charging, melting, and tapping operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. The capture efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design. Nothing in this paragraph shall prohibit the permittee from employing additional measures to ensure compliance.
- b. The particulate emission limitation required by OAC rule 3745-17-11 is less stringent than the particulate emission limitation required by OAC rule 3745-31-05(A)(3).

c. [63.1654(a)(1-3)]

The permittee must prepare, and at all times operate according to, a fugitive dust control plan that describes in detail the measures that will be put in place to control fugitive dust emissions from the individual fugitive dust emissions units at the facility. A copy of this plan must be submitted to the Ohio EPA, Southeast District Office on or before November 21, 2001.

The permittee may use existing manuals that describe the measures in place to control fugitive dust emissions units required as part of the State implementation plan or other federally enforceable requirement for particulate matter to satisfy the requirement for a fugitive dust control plan.

[63.1656(e)(1)]

Failure to have a fugitive dust control plan or failure to report deviations from the plan and take necessary corrective action would be a violation of the general duty to ensure that fugitive dust emissions units are operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions per 40 CFR Part 63.6(e)(1)(i).

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II. Operational Restrictions

1. The pressure drop across the venturi scrubber shall be continuously maintained at a value of not less than 60 inches of water at all times while the emissions unit is in operation.
2. [63.1655(b)(1)]
The permittee shall develop and implement a written maintenance plan for each air pollution control device. The plan shall be kept on record and available for the Administrator's inspection for the life of the air pollution control device or until this emissions unit is no longer subject to the provisions of Subpart XXX.

[63.1655(b)(2)]
The permittee may use the emissions unit's standard operating procedures manual or other plan, provided the alternative plan meets the requirements for the written maintenance plan and is made available for inspection when requested by the Administrator.

[63.1655(c)]
The procedures specified in the maintenance plan must include a preventive maintenance schedule that is consistent with good air pollution control practices for minimizing emissions and, for the MOR baghouse, ensure that the requirements specified in sections A.III.1 and A.III.2 are met.
3. The permittee shall maintain the capture system fan motor amperes, flow rate, and/or damper positions within the ranges and/or positions, as appropriate, that were recorded during the initial performance test that demonstrated compliance.

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

1. [63.1657(a)(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 the venturi wet scrubber stack and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log.
2. The monitoring and record keeping requirements for the MOR baghouse are specified in section A.III for emissions unit F012.
3. [63.1655(d)]

The permittee shall perform monthly inspections of the equipment that is important to the performance of the furnace capture system. This inspection must include an examination of the physical condition of the equipment, suitable for detecting holes in ductwork or hoods, flow constrictions in ductwork due to dents or accumulated dust, and operational status of flow rate controllers. Any deficiencies must be recorded and proper maintenance and repairs performed.
4. [63.1657(c)(1) through (c)(3)]

The permittee shall comply with one of the following monitoring options (the selected option must be consistent with that selected during the initial performance test required in section A.V):

 - a. check and record the control system fan motor amperes and capture system damper positions once per shift;
 - b. install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate through each separately ducted hood; or
 - c. install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate at the inlet of the air pollution control device and check and record the capture system damper positions once per shift.

[63.1657(c)(4)]
If a flow rate monitoring device is employed, it must be installed in an appropriate location in the exhaust duct such that reproducible flow rate monitoring will result and the flow rate monitoring device must have an accuracy of plus or minus 10% over its normal operating range and be calibrated according to the manufacturer's instructions.

[63.1657(c)(5)]
The Ohio EPA, Southeast District Office may require the permittee to demonstrate the accuracy of the monitoring device(s) relative to the requirements specified in 40 CFR Part 60, Appendix A, Methods 1 and 2.

[63.1657(c)(6)]
Failure to maintain the appropriate capture system parameters (fan motor amperes, flow rate, and/or damper positions) establishes the need to initiate corrective action as soon as practicable after the monitoring excursion in order to minimize excess emissions.
5. [63.1657(b)(3) and (c)(7)]

Failure to monitor or failure to take corrective action under the requirements of sections A.III.1, and A.III.3 is a violation of the general duty to operate in a manner consistent with good air pollution control practices that minimizes emissions per 40 CFR Part 63.6(e)(1)(i).
6. [63.10(b)(2)]

The permittee must maintain records, for 5 years from the date of each record, of the following information:

 - a. the occurrence and duration of each startup, shutdown, or malfunction of operation;
 - b. the occurrence and duration of each malfunction of the source or air pollution control equipment;
 - c. all maintenance performed on the air pollution control equipment;
 - d. 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) when such actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
 - 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) are consistent with the procedures specified in such plan (this information can be recorded in a checklist or similar form);
 - 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;
 - g. all results of initial or subsequent performance tests;
 - h. all documentation supporting initial notifications and notifications of compliance status; and
 - i. any applicability determination, including supporting analyses.

7. [63.1657(b)(1)]
The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the wet 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). The permittee shall monitor the pressure drop across the venturi scrubber at least every 5 minutes and record the average hourly pressure drop. Measurement of an average hourly pressure drop less than the pressure drop operating parameter limit established during a successful compliance demonstration would be a violation of the applicable emission standard, unless the excursion in the pressure drop is due to a malfunction.
8. [63.1657(b)(2)]
As part of the maintenance plan, the permittee must develop and implement corrective action procedures to be followed in the case of the observation of visible emissions from the baghouse, or the indication through the periodic baghouse system inspections that the system is not operating properly. The permittee must initiate corrective action as soon as practicable after the occurrence of the observation or event indicating a problem.

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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 the baghouse and the venturi wet scrubber stack 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.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or 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.
2. [63.1659(b)(2)]
The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the venturi scrubber was not maintained at or above the required level.
3. [63.1659(b)(1)]
The permittee must submit quarterly reports that summarize the records maintained as part of the practices described in the maintenance plan for air pollution control devices required in section A.II.3, including an explanation of the periods when the procedures were not followed and the corrective actions taken.
4. [63.1659(b)(3)]
The permittee must submit quarterly reports that explain the periods when the procedures outlined in the fugitive dust control plan were not followed and the corrective actions taken.
5. [63.1659(b)(4)]
The permittee must submit quarterly reports that summarize the capture system monitoring parameter excursions measured in accordance with the requirements specified in section A.III.4 and the corrective actions taken.
6. [63.1659(b)(2)]
The permittee shall submit quarterly reports that identify each day that the observations required under section A.III.2 were not performed and each day that any corrective measure required to be taken was not performed.
7. The MACT reporting requirements for the MOR baghouse are specified in section A.IV for emissions unit F012.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the requirements specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.
 - b. Emission Limitation:
24.7 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

2. [63.1656(c)(1)]
In accordance with 40 CFR Part 63.1656(c)(1), the permittee shall conduct an initial performance test for each air pollution control device and/or vent stack to establish compliance with the particulate emission limitation specified in 40 CFR Part 63.1652(b) and the visible particulate emission limitation specified in 40 CFR Part 63.1653.
3. [63.1656(c)(2) and (c)(3)(ii)]
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 on an annual basis and whenever production is switched from ferromanganese to silicomanganese, unless the SEDO agrees that weather conditions prohibit such testing during silicomanganese production. Emission testing during silicomanganese production shall only be required once per calendar year.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable particulate emission rate.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A.
 - d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. The permittee shall conduct the performance test such that at least one tapping period, or at least 20 minutes of a tapping period, whichever is less, is included in at least two of the three runs. The sampling time for each run shall be at least as long as three times the average tapping period of the tested furnace, but no less than 60 minutes.
 - f. The sample volume for each run shall be at least 0.9 dscm (30 dscf).
 - g. The permittee shall establish, as a site-specific operating parameter, the lowest average pressure drop of the venturi scrubber on any individual complying run in the 3 runs constituting any compliant test. The pressure drop shall be monitored at least every 5 minutes during the test and hourly averages recorded.
 - h. The pressure drop across the baghouse shall be monitored and recorded at least every 5 minutes during the test.
 - i. The permittee may augment the data obtained under sections A.V.3.g by conducting multiple performance tests to establish a range of compliant operating parameter values. The lowest value of the range established in section A.V.3.g would be selected as the operating parameter monitoring value. The use of historic compliance data may be used to establish the compliant operating parameter value if the previous values were recorded during performance tests using the same test methods specified in 40 CFR Part 63, Subpart XXX and established as required in section A.V.3.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 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.
4. [63.1656(c)(2) and (d)]
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 on an annual basis and whenever production is switched from ferromanganese to silicomanganese, unless the SEDO agrees that weather conditions prohibit such testing during silicomanganese production. Emission testing during silicomanganese production shall only be required once per calendar year.
 - b. The emission testing shall be conducted to demonstrate compliance with the visible particulate emission limitation.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A for a minimum of 60 minutes.
 - d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. The permittee shall conduct opacity observations of the shop building to demonstrate compliance with the applicable opacity standards according to 40 CFR Part 63.6(h)(5), which addresses the conduct of opacity or visible emission observations.

f. In conducting the opacity observations of the shop building, the observer must limit the field of view to the area of the shop building roof monitor that corresponds to the placement of the affected submerged arc furnace(s).

g. When demonstrating initial compliance with the shop building opacity standard, as required in section A.V.2, the permittee shall simultaneously establish parameter values for one of the following:

- i. the control system fan motor amperes and all capture system damper positions;
- ii. the total volumetric flow rate to the air pollution control device and all capture system damper positions; or
- iii. the volumetric flow rate through each separately ducted hood that comprises the capture system.

h. The permittee may petition the Ohio EPA, Southeast District Office to reestablish these parameters whenever it can be satisfactorily demonstrated that the submerged arc furnace operating conditions upon which the parameters were previously established are no longer applicable. The values of these parameters determined during the most recent demonstration of compliance shall be maintained at the appropriate level for each applicable period.

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.

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: P909 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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

- 1. None

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II. Operational Restrictions

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: Z911 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
C2P alloy crushing and sizing system (including crusher, screener, conveyors, and transfer points) vented to a baghouse	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08 40 CFR Part 63, Subpart XXX	See A.I.2.a and A.I.2.b below. 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the control device [63.1652(e)(2)]
	OAC rule 3745-17-07(A)	See A.I.2.c below. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. **Additional Terms and Conditions**

- a. The emission limitation required by OAC rule 3745-17-08 is less stringent than the emission limitation required by 40 CFR Part 63.1652(e)(2).
- b. Particulate emissions from the crusher, screener, conveyors, and transfer points shall be vented to the baghouse. The permittee shall employ reasonably available control measures for the C2P alloy crushing and sizing system to ensure compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee currently intends to maintain the enclosures and maintain a capture system in accordance with good engineering practices that will be sufficient to minimize or eliminate visible particulate emissions at the point of capture. Nothing in this paragraph shall prohibit the permittee from employing other control measures in lieu of or in addition to the currently employed control measures previously mentioned to ensure compliance, as long as

these control measures are equivalent to or better than what the permittee committed to in its permit application.

- c. [63.1654(a)]
The permittee must prepare, and at all times operate according to, a fugitive dust control plan that describes in detail the measures that will be put in place to control fugitive dust emissions from the individual fugitive dust emissions units at the facility. A copy of this plan must be submitted to the Ohio EPA, Southeast District Office on or before November 21, 2001.

The permittee may use existing manuals that describe the measures in place to control fugitive dust emissions units required as part of the State implementation plan or other federally enforceable requirement for particulate matter to satisfy the requirement for a fugitive dust control plan.

[63.1656(e)(1)]
Failure to have a fugitive dust control plan or failure to report deviations from the plan and take necessary corrective action would be a violation of the general duty to ensure that fugitive dust emissions units are operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions per 40 CFR Part 63.6(e)(1)(i).

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II. Operational Restrictions

1. [63.1655(b)(1)]
The permittee shall develop and implement a written maintenance plan for each air pollution control device. The plan shall be kept on record and available for the Administrator's inspection for the life of the air pollution control device or until this emissions unit is no longer subject to the provisions of Subpart XXX.

[63.1655(b)(2)]
The permittee may use the emissions unit's standard operating procedures manual or other plan, provided the alternative plan meets the requirements for the written maintenance plan and is made available for inspection when requested by the Administrator.

[63.1655(c)]
The procedures specified in the maintenance plan must include a preventive maintenance schedule that is consistent with good air pollution control practices for minimizing emissions and, for the baghouse, ensure that the requirements specified in sections A.III.1 through A.III.4 are met.

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III. Monitoring and/or Record Keeping Requirements

1. [63.1657(a)(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 the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log.
2. [63.1657(a)(1)]
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.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log.
3. [63.1657(a)(2)]
In addition to the daily visible emissions observation, the permittee must conduct the following activities and maintain records of the results of the activities:
- daily monitoring of the pressure drop across each baghouse cell, or across the baghouse if it is not possible to monitor each cell individually, to ensure the pressure drop is within the normal operating range identified in the baghouse maintenance plan;
 - weekly confirmation that the baghouse dust is being removed from the baghouse hoppers through visual inspection, or equivalent means of ensuring the proper functioning of removal mechanisms;
 - daily check of the compressed air supply for pulse-jet baghouses;
 - an appropriate methodology for monitoring cleaning cycles to ensure proper operation;
 - monthly check of bag cleaning mechanisms for proper functioning through visual inspection or equivalent means;
 - quarterly visual check of bag tension on reverse air and shaker-type baghouses to ensure that the bags are not kinked (knead or bent) or laying on their sides [such checks are not required for shaker-type baghouses using self-tensioning (spring loaded) devices];
 - quarterly confirmation of the physical integrity of the baghouse structure through visual inspection of the baghouse interior for air leaks; and
 - semiannual inspection of fans for wear, material buildup, and corrosion through visual inspection, vibration detectors, or equivalent means.
4. [63.1657(a)(4)]

As part of the maintenance plan, the permittee must develop and implement corrective action procedures to be followed in the case of the observation of visible emissions from the baghouse, or the indication through the periodic baghouse system inspections that the system is not operating properly. The permittee must initiate corrective action as soon as practicable after the occurrence of the observation or event indicating a problem.

5. [63.1657(a)(6)]
Failure to monitor or failure to take corrective action under the requirements of sections A.III.1 through A.III.3 would be a violation of the general duty to operate in a manner consistent with good air pollution control practices that minimizes emissions per 40 CFR Part 63.6(e)(1)(i).
6. The permittee shall maintain a record of each time a control measure for this emissions unit is not implemented in accordance with the fugitive dust control plan for the facility.

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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 the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the 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.

The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted 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.

2. The permittee shall submit deviation reports that identify each instance when a control measure, that was to be implemented in accordance with the fugitive dust control plan, was not implemented.
3. The permittee shall submit quarterly deviation reports that identify each time an inspection of the baghouse system, pursuant to the maintenance plan, indicated that the baghouse system was not operating properly and adequate corrective actions were not implemented as soon as practicable.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

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V. Testing Requirements

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

a. Emission Limitation:

20% opacity as a 3-minute average
20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the visible particulate emission observations specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. No testing, other than the initial performance test required by 40 CFR Part 63, Subpart XXX, is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

b. Emission Limitation:

0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the baghouse

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5. No testing, other than the initial performance test required by 40 CFR Part 63, Subpart XXX, is specifically required by this permit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04.

2. [63.1656(c)]
In accordance with 40 CFR Part 63.1656(c)(1), the permittee shall conduct an initial performance test within 180 days after November 21, 2001 to demonstrate compliance with the applicable emission standard for particulate emissions using the test method specified in 40 CFR Part 63.1656(b).
3. [63.1656(c)(3)(i)]
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 as an initial, one-time performance test.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate emissions from the baghouse.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A.
 - d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the 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.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020006 Emissions Unit ID: Z911 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None