



State of Ohio Environmental Protection Agency

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P.O. Box 1049
Columbus, OH 43216-1049

7/21/2009

Kris Buck
Hobart Brothers Company I
101 TRADE SQUARE EAST
TROY, OH 45373

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0855140007
Permit Number: P0092341
Permit Type: Renewal
County: Miami

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Regional Air Pollution Control Agency. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: RAPCA

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install and Operate
for
Hobart Brothers Company I**

Facility ID: 0855140007
Permit Number: P0092341
Permit Type: Renewal
Issued: 7/21/2009
Effective: 7/21/2009
Expiration: 7/21/2014



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Hobart Brothers Company I

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Permit Number: P0092341
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Authorization

Facility ID: 0855140007
Application Number(s): A0023763
Permit Number: P0092341
Permit Description: First issue PTO for Synthetic Minor PTI 08-04863, Issued as FEPTIO renewal.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 7/21/2009
Effective Date: 7/21/2009
Expiration Date: 7/21/2014
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15
This document constitutes issuance to:

Hobart Brothers Company I
101 TRADE SQUARE EAST
TROY, OH 45373

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0092341
 Permit Description: First issue PTO for Synthetic Minor PTI 08-04863, Issued as FEPTIO renewal.

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

Group Name: Welding Wire Draw Benches

Emissions Unit ID:	P030
Company Equipment ID:	Draw Benches 203,4,6,7,8
Superseded Permit Number:	08-04863
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P031
Company Equipment ID:	Draw Benches 209,10,11,12,14
Superseded Permit Number:	08-04863
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P032
Company Equipment ID:	Draw Benches 215,16,17,18,19
Superseded Permit Number:	08-04863
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P033
Company Equipment ID:	Draw Benches 220, 221, 222, 223
Superseded Permit Number:	08-04863
General Permit Category and Type:	Not Applicable



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A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Regional Air Pollution Control Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the



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change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



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B. Facility-Wide Terms and Conditions



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1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



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C. Emissions Unit Terms and Conditions



1. Emissions Unit Group - Welding Wire Draw Benches: P030, P031, P032, P033,

EU ID	Operations, Property and/or Equipment Description
P030	tubular wire draw benches 203, 204, 205, 206, 207, and 208 with fabric filter (T3B);
P031	Tubular wire draw benches 209, 210, 211, 212, 213, and 214 with fabric filter (T4B)
P032	Tubular wire draw benches 215, 216, 217, 218, and 219 with fabric filter (T5B)
P033	Welding Wire Draw Benches 220, 221, 222 and 223 with Fabric Filter (T6B)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p><u>Emissions Units P030 and P031:</u> The PE (PE) from each emissions unit shall not exceed 0.01 grain/dry standard cubic foot (dscf), 2.83 lbs/hour and 12.4 tons per year (TPY).</p> <p><u>Emissions Unit P032:</u> The PE from this emissions unit shall not exceed 0.01 grain/ dscf, 1.80 lbs/hour and 7.88 TPY.</p> <p><u>Emissions Unit P033:</u> The PE from this emissions unit shall not exceed 0.01 grain/dscf, 3.34 lbs/hour and 14.6 TPY.</p> <p>Visible PE from any stack serving these emissions units shall not exceed 5 percent opacity as a six-minute average.</p>
b.	OAC rule 3745-31-05(D)	The PE from these emissions units shall



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(synthetic minor to avoid Title V)	not exceed 47.3 tons per year based upon a rolling 12-month summation. See b)(2)a., b)(2)b., and c)(1)
c.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 3745-31-05(A)(3).
d.	OAC rule 3745-17-07	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. Compliance with the requirements of OAC rule 3745-31-05(D) shall be demonstrated by the use of a fabric filter control device, pressure drop monitoring, record keeping, reporting and compliance with the emissions limits in b)(1)a.
- b. The permittee shall implement an operation and maintenance (O&M) plan for this emissions unit and its respective air pollution control system. The O&M plan shall include, but not be limited to, the specific steps taken and/or the specific items checked on a routine basis to ensure optimum operation of the emissions unit and its respective air pollution control system. The O&M plan shall be submitted to the Regional Air Pollution Control Agency upon request.

c) Operational Restrictions

- (1) The filter media used in the fabric filter shall be designed to limit particulate emissions to less than 0.01 grain/dry standard cubic foot.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure differential, in inches of water, across the fabric filter during operation of this emissions unit, including periods of startup and shutdown. 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 differential on a daily basis.

Whenever the monitored value for the pressure differential deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.



In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure differential reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure differential across the fabric filter is 0.5 to 6.0 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE 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 eliminate the visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the fabric filter was outside of the acceptable range;



- b. an identification of each incident of deviation described in e)(1)a. where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in e)(1)a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

(2) The permittee shall submit semiannual written reports that:

- a. identify all days during which any visible PE were observed from the stack serving this emissions unit, and;
- b. describe any corrective actions taken to eliminate the visible PE.

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 six-month periods.

(3) The permittee shall submit annual reports which specify:

- a. the particulate emission rate, in tons, from each emissions unit, and;
- b. the total combined PE rate, in tons, from emissions unit P030, P031, P032 and P033.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data for each emissions unit in the annual Synthetic Minor Title V Fee Emissions Report.

f) Testing Requirements

(1) Compliance with the emission limitation(s) in b)(1) shall be determined in accordance with the following method(s):

a. Emission Limitation:

The PE from this emissions unit shall not exceed 0.01 grain/dscf.

Applicable Compliance Method:

Compliance shall be demonstrated based on the design specifications of the filter media used in the fabric filter. If requested, compliance shall be determined by stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using the methods and procedures specified in Reference Method 5 of 40 CFR Part 60, Appendix A.



b. Emission Limitation:

PE shall not exceed 2.83 lbs/hour each from emissions unit P030 and P031, 1.80 lbs/hour from emissions unit P032 and 3.34 lbs/hour from emissions unit P033.

Applicable Compliance Method:

The hourly PE limitations are based upon the 0.01 grain/dscf multiplied by the design flow rate of each fabric filter divided by 7,000 grains/pound and multiplied by 60 minutes/hour. The design air flow rate for each emissions unit is listed in the following table.

Emissions Unit	Flow rate (dscf/minute)	PE Limit (lbs/hour)
P030	33,000	2.83
P031	33,000	2.83
P032	21,000	1.80
P033	39,000	3.34

If requested, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(10) using the methods and procedures specified in Reference Method 5 of 40 CFR Part 60, Appendix A.

c. Emission Limitation:

PE shall not exceed 12.4 each from emissions unit P030 and P031, 7.88 TPY from emissions unit P032, and 14.6 TPY from emissions unit P033.

Applicable Compliance Method:

The TPY emission limitations for each emissions unit were developed by multiplying the hourly emissions limit by 8,760 hours/year, divided by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly emissions limitation, compliance is also shown with the annual allowable mass emission rate.

d. Emission Limitation:

The PE from emissions units P030, P031, P032 and P033 shall not exceed 47.3 tons per year based upon a rolling 12-month summation.

Applicable Compliance Method:

The 47.3 TPY emission limitation was developed by multiplying the 10.8 lbs/hour sum of the hourly emissions limits for emissions units P030, P031, P032 and P033 by 8,760 hours/year, divided by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly emissions limitations, compliance is also shown with the annual allowable mass emission rate.



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e. Emission Limitation:

Visible PE from any stack shall not exceed 5 percent opacity as a six-minute average.

Applicable Compliance Method:

If requested, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in Reference Method 9 of 40 CFR Part 60, Appendix A..

g) Miscellaneous Requirements

- (1) The terms and conditions of this permit supersedes those of PTI 08-04863 issued on October 30, 2007 for emissions units P030, P031, P032 and P033.