John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

7/1/2013

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Rick Rupert
PRO-TEC Coating Company
5500 PRO-TEC Parkway
CGL1/CGL2 Complex
Leipsic, OH 45856-9234

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0369000025
Permit Number: P0113381
Permit Type: Administrative Modification
County: Putnam

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA)Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Indiana; Canada

FINAL

Division of Air Pollution Control
Permit-to-Install
for
PRO-TEC Coating Company

Facility ID:	0369000025
Permit Number:	P0113381
Permit Type:	Administrative Modification
Issued:	7/1/2013
Effective:	7/1/2013

Division of Air Pollution Control
Permit-to-Install
for
PRO-TEC Coating Company

Table of Contents

Authorization

Facility ID:	0369000025
Facility Description:	Steel Finishing Mill
Application Number(s):	M0002136
Permit Number:	P0113381
Permit Description:	Administrative modification to accurately describe the annealing furnace P001 maximum heat input (92.0 mmBtu/hour) due to equipment limitations.
Permit Type:	Administrative Modification
Permit Fee:	$625.00
Issue Date:	7/1/2013
Effective Date:	7/1/2013

This document constitutes issuance to:

PRO-TEC Coating Company
5000 County Rd. #5
Leipsic, OH 45856-9234

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0113381
Permit Description: Administrative modification to accurately describe the annealing furnace P001 maximum heat input (92.0 mmBtu/hour) due to equipment limitations.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**P001**
Company Equipment ID:	AF-CGL
Superseded Permit Number:	03-16048
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

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

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

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

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have

been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed.The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

C. Emissions Unit Terms and Conditions

1. P001, AF-CGL

Operations, Property and/or Equipment Description:

80 MMBtu/hr Continuous Annealing Furnace with 12 MMBtu/hr aux. heat input (92 MMBtu/hr total)

a) 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) d)(13), d)(14), d)(15), d)(16), and e)(4).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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 3745-17-07(A)	See b)(2)a.
b.	OAC rule 3745-17-11(B)(2)	See b)(2)b.
	OAC rule 3745-31-05(A)(3)	0.10 lb nitrogen oxides (NOx)/mmBtu [See b)(2)c. and b)(2)d.] 9.2 lbsNOx/hr [See b)(2)c. and b)(2)d.] 40.30 tons NOx/yr 11.9 lbs carbon monoxide (CO)/hr and 52.05 tons CO/yr 1.04 lbs organic compounds (OC)/hr and 4.56 tons OC/yr 0.72 lb particulate emissions (PE)/hr and 3.15 tons PE/yr [See b)(2)e.]
c.	Federal Consent Decree	See b)(2)f.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

b. The uncontrolled mass rate of PE from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II

of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Putnam County, which is identified as a P-2 county.

c. The permittee shall employ North American regenerative-type burners with flue gas recirculation and a NOx OUT SCR system with Hauck direct-fired burners to maintain the recommended gas temperatures for NOx emissions reduction. The NOx emissions shall be limited to 0.10 lbNOx/mmBtu, based on a 3-hour rolling average, when this emissions unit is “in a production mode of operation”. "In a production mode of operation" shall mean that the main burners are firing and the product is moving through the continuous annealing furnace. "In a production mode of operation" shall not include low fuel flow/low temperature furnace conditions, such as idle and furnace temperature ramp-up and ramp-down.

d. During times that the furnace is not "in a production mode of operation" and the main burners are idling or only the pilot burners are operating,the 9.2* lbs/hrNOx limit shall be met at all times. The emission limitation of 0.10 pound NOx/mmBtu is not applicable during times that the furnace is not “in a production mode of operation”.

* The 9.2 pounds NOx per hour limitation shall be based on a 3-hour rolling average.

e. All PE is assumed to be PM10.

f. The facility agreed and consented to entry into a Consent Decree with the United States of America (Civil Action No. 3:98CV 7749, entered 2/11/98) requiring the permittee to install an SCR unit to continuously control NOx emissions to an emission rate not to exceed 0.10 lbsNOx/mmBtu.

c) Operational Restrictions

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

(2) The maximum heat input (including the lance pilot) shall not exceed 92.0 mmBtu/hr.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall properly install, operate and maintain equipment to continuously monitor and record the following NOx emission values at the discharge of the SCR units, when the emissions unit is operating in a production or a non-production mode of operation:

a. Production mode of operation:

i. LbNOx/mmBtu heat input, as a 3-hr rolling average

b. Non-production mode of operation:

i. LbNOx/hr, as a 3-hr rolling average

c. The NOx analyzers associated with this emissions unit are used as part of the process control system for the SCR unit. The data from the analyzers is used to adjust the SCR reagent injection flow rate to optimize the performance of the SCR unit.

The analyzer was not installed with the intent of satisfying the requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 2, and therefore cannot be certified as a true continuous NOx monitoring system. Even though the analyzer cannot be certified as true continuous NOx monitoring system, it has demonstrated that it provides accurate NOx emission concentration data as compared to emission concentration data simultaneously obtained through 40 CFR Part 60, Appendix A, Method 7E. As such, the data from the analyzer will be used as part of a data acquisition system to collect and record information to ensure ongoing compliance with the NOx emission limitations.

(3) Whenever the monitored values for NOx emissions at the discharge of the SCR unit deviate from the applicable limitations contained within this permit, 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 ranges, 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 SCR reagent-gas ratio and SCR inlet temperature 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.

(4) The SCR reagent-gas ratio shall be determined and adjusted on a continuous basis by a primary control circuit based on natural gas flow rate, which shall determine the appropriate SCR reagent flow rate to the SCR unit. Additionally, a secondary control circuit shall be utilized consisting of the required NOx analyzer above which shall increase or decrease the SCR reagent flow rate according to NOx concentrations observed at the discharge of the SCR unit. The purpose of the secondary control circuit is to optimize the efficiency of the SCR control system and minimize the SCR reagent slip to the atmosphere. The programmable logic controller (PLC) program utilized by the primary and secondary control circuits shall not be altered from the control logic

instituted during the most recent compliance test. If alterations to the PLC program are necessary, permittee shall submit requested changes to the permitting authority for approval.

(5) The permittee shall properly install, operate and maintain equipment necessary to continuously monitor and record the following parameter for the SCR unit during all time periods when SCR reagent is utilized by the control system. The monitoring and recording devices shall be capable of accurately measuring the desired parameters. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee:

a. the SCR inlet temperature, in degrees Fahrenheit, as a 3-hr rolling average;

(6) Whenever the monitored values for the SCR inlet temperature deviate 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 ranges 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 SCR inlet temperature 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.

a. The SCR inlet temperature shall be continuously maintained, at all times while the emissions unit is “in a production mode of operation”, at a value of not less than the average temperature of 520 degrees or greater than the average of 730 degrees Fahrenheit based upon a 3-hour average.

These ranges are 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 ranges based upon information obtained during future NOx emission tests that demonstrate compliance with the allowable NOx emission rate for this emissions unit. In addition, approved revisions to the ranges 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.

(7) The permittee shall collect and record the following information each month for this emissions unit:

a. all 3-hour blocks of time during which the average temperature of the flue gases at the inlet to the SCR unit, when the emissions unit was “in a production mode of operation”, was less than the average temperature of 520 degrees Fahrenheit and/or greater than 730 degrees Fahrenheit;

b. all 3-hour periods during which the average NOx emission rate was greater than 9.2 pounds NOx per hour;

c. all 3-hour periods during which the average NOx emission rate was greater than 0.10 pound NOx per mmBtu; and

d. identification of all time periods when natural gas was fired in the annealing furnace and the monitoring requirements specified in d)(1) and/or d)(4) were not maintained.

(8) The permittee shall maintain daily records of the following information for this emissions unit:

a. the total number of hours the emissions unit was “in a production mode of operation”;

b. the Btu content of fuel (Btu per standard cubic feet) as specified by the natural gas supplier;

c. the total natural gas fuel usage while the emissions unit was “in a production mode of operation”, in mmft3; and

d. the firing rate, in mmBtu/hr, using the following equation:

firing rate (mmBtu/hr) = [d)(8)b. times d)(8)c.] divided by d)(8)a.

(9) The permittee shall operate and maintain the existing equipment to continuously monitor and record NOx emissions from this emissions unit in units of the applicable standard. The NOx analyzers, monitoring, and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations and the procedures specified in the permittee's ISO 14001 environmental management system.

The permittee shall maintain records of all data obtained by the continuous NOx analyzers and monitoring system including, but not limited to, parts per million NOx on an instantaneous (one-minute) basis, emissions of NOx in units of the applicable standard in the appropriate averaging period (i.e., pounds/hour and pounds/mmBtu for each rolling, 3-hour period), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

(10) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(11) After approval of monitoring under this part, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing

indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(12) The CAM plan for this emissions unit has been developed for NOx emissions. The CAM performance indicators for the selective catalytic reduction (SCR) controlling this emissions unit are SCR reagent injection flow rate, inlet gas temperature at the SCR, NOx ppm measurement and O2% measurement post SCR which is based upon the result of site-specific NOx emission testing and manufacturer recommendations. When the performance indicators are operating outside the indicator ranges, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and comply with the reporting requirements specified in e)(3) below. The emissions unit and control equipment shall be run in accordance with the approved CAM Plan or any approved revision of the Plan.

SCR operating parameters will be re-verified through periodic emission testing, or if the SCR or emissions units operating conditions change. In addition to periodic monitoring of the SCR operating parameters, the permittee also has an inspection/preventative maintenance program for the SCR. Based on the results of the inspection/preventative maintenance program, repairs to the SCR shall be made as needed. If the current CAM indicators and/or the SCR inspection/preventative maintenance program are considered inadequate, the permittee will develop a Quality Improvement Plan.

(13) The permit-to-install (PTI) application for this emissions unit(s) [P001] was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. Threshold Limit Value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or

ii. Short Term Exposure Limit (STEL) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., ‘‘X” hours per day and “Y” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

(TLV/10) x (8/X) x (5/Y) = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: Ammonia

TLV (mg/m3): 17,000

Maximum Hourly Emission Rate (lbs/hr): 1.82

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6.5

MAGLC (ug/m3): 404,800

The permittee has demonstrated that emissions of ammonia, from emissions unit(s) P001, are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

(14) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(15) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(16) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the 3-hour average NOx emission limitation of 9.2 lbs/hr;

b. the 3-hour average NOx emission limitation of 0.1 lb/mmBtu;

c. the 3-hour average SCR inlet temperature range required by section d)(5)a.;* and

d. the maximum heat input rate of 92.0 mmBtu per hour.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

* Any 3-hour average SCR inlet temperature value that was outside the permitted SCR inlet temperature range may be considered to be an exceedance only if it occurred concurrently with an exceedance of the 0.10 pound NOx per mmBtu or the 9.2 pounds NOx/hr limitations (based upon a 3-hour average of the emission rates).

(3) If the results of the monitoring or record keeping data indicate that the NOx emission limitations may have been exceeded, the permittee shall submit the results of that data, and document any corrective action taken to restore operation of the emissions unit, or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The reports shall be submitted in accordance with Standard Terms and Conditions of this permit.

(4) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. The emission testing shall be conducted within 12 months prior to permit expiration. (This requirement was fulfilled by testing performed on September 16, 2004.)

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitations for NOx and CO.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. NOx - Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A; and

ii. CO - Methods 1 through 10 of 40 CFR, Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

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

* During the emission testing, the permittee shall also record the SCR reagent flow rate and the average temperature of the exhaust gases immediately before the catalyst bed for each run.

(2) 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.

(3) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation: 0.10 lbNOx/mmBtu

Applicable Compliance Method: The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 7.

Also, the permittee may demonstrate compliance with the emission limitation above based on the record keeping requirements specified in d)(3) of this permit.

b. Emission Limitations: 9.2 lbsNOx/hr and 40.30 tons/yrNOx

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly emission limitation above based upon emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 7.

Also, the permittee may demonstrate compliance with the hourly emission limitation above based on the record keeping requirements specified in d)(3) of this permit.

The annual emission limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

c. Emission Limitations: 11.9 lbs CO/hr and 52.05 tons/yr CO

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly emission limitation above based upon the results of emission testing conducted in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

d. Emission Limitations: 1.04 lbs OC/hr and 4.56 tons/yr OC

Applicable Compliance Method: The permittee shall demonstrate compliance with the lbs/hr emission limitation based upon calculations using the maximum rated capacity of the annealing furnace and auxiliary natural gas burners (92 mmBtu/hr), an AP-42 Chapter 1/4 (7/98) emission factor of 11.0 lb OC/mmft3 of natural gas and 1020 Btu/ft3 of natural gas.

If required, compliance with the hourly limitation shall be determined using the test methods and procedures described in Methods 1 through 4, and Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

The annual emission limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

e. Emission Limitations: 0.72 lb PE/hr and 3.15 tons/yr PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the lb/hr emission limitation based upon calculations using the maximum rated capacity of the annealing furnace and the auxiliary natural gas burners (92 mmBtu/hr), an AP-42 Chapter 1.4 (7/98) emission factor of 7.6 lb PE/mmft3 of natural gas and 1020 Btu/ft3 of natural gas.

If required, the permittee shall demonstrate compliance with the hourly particulate emission limitation in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

g) Miscellaneous Requirements

(1) None.