OhioEPA

State of Ohio Environmental Protection Agency

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

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

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

12/31/02

CERTIFIED MAIL

RE: Final Title V Administrative Permit Amendment Chapter 3745-77 permit

06-84-02-0006
Eramet Marietta, Inc.
John R Hughes
St. Rt. #7 South
Marietta, OH 45750-0299

Dear John R Hughes:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Southeast District Office.

Very truly yours,

Michael W. Ahern

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

cc: Southeast District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

FINAL TITLE V ADMINISTRATIVE PERMIT AMENDMENT

Effective Date: **01/08/03**	Expiration Date: **01/08/08**	Modification Issue Date: **12/31/02**

This document constitutes issuance of a Title V permit for Facility ID: 06-84-02-0006 to:
Eramet Marietta, Inc.
St. Rt. #7 South
Marietta, OH 45750-0299

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

B005 (Grizzly Generator)
Diesel generator for grizzly sizing operation

F001 (Roads & Parking Areas)
Plant wide roadways and parking areas

F002 (Storage Piles)
Plant wide storage piles

F007 (Furnace 1 Casting)
Furnace #1 casting

F008 (Furnace 12 Casting)
Furnace #12 casting

F009 (Furnace 18 Casting)
Furnace #18 casting

F010 (Grizzly Sizing)
Grizzly sizing operation

F012 (Met Oxy Red Process)
Metal Oxygen Reduction process

F013 (Raw Mat - Bldg. 52)
Building 52 crusher

F014 (C7P Crush Sys 3 & 4)
C7P Systems #3 & #4. Crushing, sizing and packing of material

F016 (Metal Powders)
Fine sizing and impactor (systems #5 & #6) for metal powders

F017 (Simplex Systems)
Simplex mix, milling, furnace and packing system

P018 (Vacuum Furnace 50)
Vacuum Furnace #50

P020 (Mang Metal Process)
Electolytic manganese production

P022 (Chrome Metal Process)
Electolytic chromium production

P025 (EM Briquetting)
EM briquetting system

P901 (#1 Furnace)
Submerged Arc Furnace

P908 (#12 Furnace)
Submerged Arc Furnace

P909 (#18 Furnace)
Submerged Arc Furance

Z911 (C2P Alloy Crushing and Sizing)
C2P alloy crushing

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

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

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

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

i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset condition, of any emissions unit(s) or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upset conditions.

Except as provided in OAC rule 3745-15-06, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.
(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

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

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

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

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

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

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

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

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

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

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

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

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

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

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

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

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

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

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

14. Operational Flexibility

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

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

15. Emergencies

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

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

16. Off-Permit Changes

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

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that

qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

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

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

B. ***State Only Enforceable Section***

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. Records Retention Requirements

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

3. Inspections and Information Requests

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

4. Scheduled Maintenance/Malfunction Reporting

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

bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

5. Permit Transfers

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

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

None

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.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Grizzly Generator (B005)

Activity Description: Diesel generator for grizzly sizing operation

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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. See A.I.2.a below.
	OAC rule 3745-17-11(B)(5)(a)	Particulate emissions shall not exceed 0.310 lb/mmBtu of actual heat input. See A.I.2.b below.
	OAC rule 3745-18-06	exempt See A.I.2.c below.
	OAC rule 3745-21-08(B)	See A.I.2.d below.
	OAC rule 3745-23-06(B)	See A.I.2.d below.

2. Additional Terms and Conditions

2.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.

2.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.

2. Additional Terms and Conditions (continued)

2.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.

2.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.

II. Operational Restrictions

None

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.

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.

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:

1.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.

V. Testing Requirements (continued)

1.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.

1.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.

1.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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Roads & Parking Areas (F001)

Activity Description: Plant wide roadways and parking areas

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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)
	40 CFR Part 63, Subpart XXX	See A.I.2.j below.
unpaved roadways and parking areas (see section A.I.2.b)	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 availabe 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

2.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:

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/ElChrome area

2. Additional Terms and Conditions (continued)

2.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

2.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.

2.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.

2.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.

2.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.

2.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.

2.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.

2.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.

2. Additional Terms and Conditions (continued)

2.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).

II. Operational Restrictions

None

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.

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

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.

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.

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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Storage Piles (F002)

Activity Description: Plant wide storage piles

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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 See sections A.I.2.b, A.I.2.c, and A.I.2.f.
	40 CFR Part 63, Subpart XXX	See A.I.2.g below.
wind erosion from 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. See sections A.I.2.d, A.I.2.e, and A.I.2.f.
	40 CFR Part 63, Subpart XXX	See A.I.2.g below.

2. Additional Terms and Conditions

2.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:

storage piles in north area
storage piles in south area
storage piles in east area

2. Additional Terms and Conditions (continued)

2.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.

2.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.

2.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.

2.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.

2.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.

2.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).

II. Operational Restrictions

None

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.

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.

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:

1.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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Furnace 1 Casting (F007)

Activity Description: Furnace #1 casting

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
furnace #1 shop casting	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

2.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.

2.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).

II. Operational Restrictions

None

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.

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.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Furnace 12 Casting (F008)

Activity Description: Furnace #12 casting

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
furnace #12 shop casting	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

2.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.

2.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).

II. Operational Restrictions

None

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.

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.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Furnace 18 Casting (F009)

Activity Description: Furnace #18 casting

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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

2.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.

2.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).

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.

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.

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.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Grizzly Sizing (F010)

Activity Description: Grizzly sizing operation

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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).
		21.02 tpy of particulate emissions
	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)	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

2.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.

2. Additional Terms and Conditions (continued)

2.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).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible 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.

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.

V. Testing Requirements

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

1.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.

1.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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Met Oxy Red Process (F012)

Activity Description: Metal Oxygen Reduction process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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	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(d)] See A.I.2.c below.
	OAC rule 3745-17-07(A)	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

2.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).

2.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.

2. Additional Terms and Conditions (continued)

2.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).

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.

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.

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

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 (kneed 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.

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.

IV. Reporting Requirements (continued)

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.

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:

1.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.

1.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).

V. Testing Requirements (continued)

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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Raw Mat - Bldg. 52 (F013)

Activity Description: Building 52 crusher

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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

2.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.

2. Additional Terms and Conditions (continued)

2.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).

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.

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.

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

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 (kneed 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.

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.

IV. Reporting Requirements (continued)

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.

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:

1.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.

1.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.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: C7P Crush Sys 3 & 4 (F014)

Activity Description: C7P Systems #3 & #4. Crushing, sizing and packing of material

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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)	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 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

2.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).

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.

2. Additional Terms and Conditions (continued)

2.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).

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.

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.

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

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 (kneed 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.

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.

IV. Reporting Requirements (continued)

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.

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:

1.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.

1.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.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Metal Powders (F016)

Activity Description: Fine sizing and impactor (systems #5 & #6) for metal powders

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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

2.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).

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.

2. Additional Terms and Conditions (continued)

2.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).

2.d This emissions unit consists of 2 fine sizing and impactor sytems (#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.

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.

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.

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

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 (kneed 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.

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.

IV. Reporting Requirements (continued)

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.

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:

1.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.

1.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.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Simplex Systems (F017)

Activity Description: Simplex mix, milling, furnace and packing system

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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. See A.I.2.a below.
	OAC rule 3745-17-07(A)	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

2.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.

II. Operational Restrictions

None

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.

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.

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:

V. Testing Requirements (continued)

1.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.

1.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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Vacuum Furnace 50 (P018)

Activity Description: Vacuum Furnace #50

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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

None

II. Operational Restrictions

None

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.

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.

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:

1.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.

1.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.

1.c Emission Limitation:

2.8 lbs/hr of CO

Applicable Compliance Mehtod:

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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Mang Metal Process (P020)

Activity Description: Electolytic manganese production

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
manganese metal process (ElMN) (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

2.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 emisisons 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.

2.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.

II. Operational Restrictions

None

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.

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

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.

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.

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:

1.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.

V. Testing Requirements (continued)

1.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.

1.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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Chrome Metal Process (P022)

Activity Description: Electolytic chromium production

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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

2.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 emisisons 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.

2.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.

II. Operational Restrictions

None

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.

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

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.

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.

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:

1.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.

V. Testing Requirements (continued)

1.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.

1.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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EM Briquetting (P025)

Activity Description: EM briquetting system

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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. See A.I.2.a below.
	OAC rule 3745-17-07(A)	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

2.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.

II. Operational Restrictions

None

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.

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.

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:

V. Testing Requirements (continued)

1.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.

1.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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #1 Furnace (P901)

Activity Description: Submerged Arc Furnace

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		[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

2.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.

2.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.

2.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).

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.

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 (kneed 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.

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

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, 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).

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

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.

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.

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.

IV. Reporting Requirements (continued)

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.

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:

1.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.

1.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.

V. Testing Requirements (continued)

1.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:

a. The emission testing shall be conducted on an annual basis.

b. The emission testing shall be conducted to demonstrate compliance with the allowable particulate emission rates for silicomanganese and ferromanganese.

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 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.

V. Testing Requirements (continued)

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.

b. The emission testing shall be conducted to demonstrate compliance with the visible particulate emission limitation for silicomanganese and ferromanganese production.

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.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #12 Furnace (P908)

Activity Description: Submerged Arc Furnace

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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. When processing high carbon ferrochromium, particulate emissions shall not exceed 39 lbs/hr.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		[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

2.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.

2.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.

2.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).

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.

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.

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

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).

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

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.

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.

IV. Reporting Requirements (continued)

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.

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:

1.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.

1.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.

1.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.

1.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.

V. Testing Requirements (continued)

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.

V. Testing Requirements (continued)

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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #18 Furnace (P909)

Activity Description: Submerged Arc Furance

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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. 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.
	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 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	See A.I.2.b below.
	40 CFR Part 63, Subpart XXX	[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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		[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

2.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.

2.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).

2.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).

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.

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.

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

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).

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

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.

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 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.

IV. Reporting Requirements (continued)

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.

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:

1.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.

1.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.

V. Testing Requirements (continued)

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.

V. Testing Requirements (continued)

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.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: C2P Alloy Crushing and Sizing (Z911)

Activity Description: C2P alloy crushing

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
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	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 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

2.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).

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.

2. Additional Terms and Conditions (continued)

2.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).

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.

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.

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

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 (kneed 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.

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.

IV. Reporting Requirements (continued)

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.

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:

1.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.

1.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.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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