



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
CUYAHOGA COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 13-03861

DATE: 4/29/2004

American Spring Wire Corporation
Mike Ahrens
26300 Miles Road
Bedford Heights, OH 44146

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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 within thirty (30) days after the notice of the Directors 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. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

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

cc: USEPA

CLAA



**Permit To Install
Terms and Conditions**

**Issue Date: 4/29/2004
Effective Date: 4/29/2004**

FINAL PERMIT TO INSTALL 13-03861

Application Number: 13-03861
APS Premise Number: 1318041114
Permit Fee: **\$5000**
Name of Facility: American Spring Wire Corporation
Person to Contact: Mike Ahrens
Address: 26300 Miles Road
Bedford Heights, OH 44146

Location of proposed air contaminant source(s) [emissions unit(s)]:
**26300 Miles Road
Bedford Heights, Ohio**

Description of proposed emissions unit(s):
Two wire shotblasting descaling lines, one wire surface removal line, and one tempering furnace -- P008, P009, P013, and P016.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the 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.)

3. 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.

4. 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.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

American Spring Wire Corporation
PTI Application: 13-03861
Issued: 4/29/2004

Facility ID: 1318041114

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	39.58
PM ₁₀	9.73
Pb	0.59
CO	2.52
OC	0.33
SO ₂	0.02
NO _x	3.00

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P008 - Shotblast wire descaling line (Co. ID CR-30) with a maximum process weight rate of 3,500 lbs/hr controlled by a size 2.5 Rotoclone scrubber	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 2.14 lbs/hr and 9.37 tpy.
		PM ₁₀ emissions shall not exceed 0.62 lb/hr and 2.72 tpy.
		Visible emissions from the scrubber outlet shall not exceed 10 percent opacity, as a six-minute average, during any sixty-minute observation period.
	OAC rule 3745-17-07(A)(1)	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a None.

B. Operational Restrictions

1. The pressure drop across the scrubber shall be continuously maintained at a range of 6 to 11

inches of water at all times while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
2. The permittee shall collect and record the following information each day:
 - a. The pressure drop across the scrubber, in inches of water, on a once per shift basis.
 - b. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Cleveland Division of Air Quality (Cleveland DAQ) that identify all periods of time during which the static pressure drop across the scrubber was not maintained between the required levels.

E. Testing Requirements

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

- a. Emission Limitation:
2.14 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance with the mass emission limitation shall be demonstrated by using an emission factor (EF) of 0.10 grain/acf in the following equation:

$$(2,500 \text{ acfm}) \times (60 \text{ min/hr}) \times (\text{EF}) \times (1 \text{ lb}/7,000 \text{ grains}) = \text{lbs PE/hr}$$

If required by Ohio EPA or Cleveland DAQ, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03 (B)(10).

- b. Emission Limitation:
9.37 tpy of particulate emissions

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- c. Emission Limitation:
0.62 lb/hr of PM₁₀ emissions

Applicable Compliance Method:

Compliance with the mass emission limitation shall be demonstrated by multiplying the PE emission rate, in lb/hr, by an emission factor (EF) of 0.29. The PM₁₀ emission factor was determined from a PM₁₀ particle size distribution analysis performed by HB Engineering, Inc. and EDP Consultants, Inc. in March, 2004.

If required by Ohio EPA or Cleveland DAQ, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 201.

- d. Emission Limitation:
2.72 tpy of PM₁₀ emissions

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- e. Emission Limitation:
Visible emissions from the scrubber outlet shall not exceed 10 percent opacity, as a six-minute average, during any sixty-minute observation period.

Applicable Compliance Method:

If required by Ohio EPA or Cleveland DAQ, compliance shall be determined through visible emission observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures in OAC rule 3745-17-03(B)(1).

American Spring Wire Corporation
PTI Application: 13-03961
Issued

Facility ID: 1318041114

Emissions Unit ID: P008

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P009 - Shotblast wire descaling line (Co. ID UD-20) with a maximum process weight rate of 5,000 lbs/hr controlled by a size 2.5 Rotoclone scrubber	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 2.14 lbs/hr and 9.37 tpy. PM ₁₀ emissions shall not exceed 0.62 lb/hr and 2.72 tpy.
	OAC rule 3745-17-07(A)(1)	Visible emissions from the scrubber outlet shall not exceed 10 percent opacity, as a six-minute average, during any sixty-minute observation period.
	OAC rule 3745-17-11	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a None.

B. Operational Restrictions

1. The pressure drop across the scrubber shall be continuously maintained at a range of 6 to 11 inches of water at all times while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
2. The permittee shall collect and record the following information each day:
 - a. The pressure drop across the scrubber, in inches of water, on a once per shift basis.
 - b. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Cleveland Division of Air Quality (Cleveland DAQ) that identify all periods of time during which the static pressure drop across the scrubber was not maintained between the required levels.

E. Testing Requirements

1. Compliance with the emission limitation(s) in sections A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
2.14 lbs/hr of particulate emissions

Applicable Compliance Method:
Compliance with the mass emission limitation shall be demonstrated by using Methods 1 through 5 as outlined in 40 CFR Part 60, Appendix A, as specified in section E.2.
 - b. Emission Limitation:

American Spring Wire Corporation

PTI Application: 12-02861

Issued

Facility ID: 1318041114

Emissions Unit ID: **P009**

9.37 tpy of particulate emissions

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- c. Emission Limitation:
0.62 lb/hr of PM₁₀ emissions

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be demonstrated by using Method 201 as outlined in 40 CFR Part 60, Appendix A, as specified in section E.2

- d. Emission Limitation:
2.72 tpy of PM₁₀ emissions

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- e. Emission Limitation:
Visible emissions from the scrubber outlet shall not exceed 10 percent opacity, as a six-minute average, during any sixty-minute observation period.

Applicable Compliance Method:

Compliance shall be determined through visible emission observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures in OAC rule 3745-17-03(B)(1), as specified in section E.2.

2. 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 no later than 90 days after the issuance of this permit unless otherwise approved by the Cleveland Division of Air Quality.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limit for particulate emissions (pounds per hour) and PM₁₀ emissions (pounds per hour) of the exhaust gases from the outlet of the scrubber, and the visible particulate emission limit.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate for particulate emissions: U.S. EPA Methods 1 through 5 of 40 CFR, Part 60, Appendix A for particulate emissions; U.S. EPA Method 201 of 40 CFR, Part 60, Appendix A for PM₁₀; and U.S. EPA Method 9 of 40 CFR, Part 60 Appendix A for visible particulate emissions. Alternative U.S. EPA approved test methods may be used with the prior approval from the Cleveland Division of Air Quality.

- d. The test(s) shall be conducted while the emissions unit is operated at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland Division of Air Quality. 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 Cleveland Division of Air Quality's refusal to accept the results of the emission test(s).
- f. Personnel from the Cleveland Division of Air Quality 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.
- g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland Division of Air Quality 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 Cleveland Division of Air Quality.

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P013 - Wire grinding line with three (3) continuously operating grinders (Co. ID XR-4) and two Rotoclone size 6 wet scrubbers	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 14.8 tpy.
		PM ₁₀ emissions shall not exceed 0.98 lb/hr and 4.29 tpy.
		The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-17-11(B)(1).
	OAC rule 3745-17-07(A)(1)	Visible emissions from each scrubber outlet shall not exceed 10 percent opacity, as a six-minute average, during any sixty-minute observation period.
	OAC rule 3745-17-11(B)(1)	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		PE shall not exceed 3.38 lbs/hr.

2. Additional Terms and Conditions

- 2.a None.

B. Operational Restrictions

1. The pressure drop across each scrubber shall be continuously maintained at a range of 6 to 11 inches of water at all times while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across each scrubber while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
2. The permittee shall collect and record the following information each day:
 - a. The pressure drop across each scrubber, in inches of water, on a once per shift basis.
 - b. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Cleveland Division of Air Quality (Cleveland DAQ) that identify all periods of time during which the static pressure drop across the scrubber was not maintained between the required levels.

E. Testing Requirements

1. Compliance with the emission limitation(s) in sections A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
3.38 lbs/hr of particulate emissions

Applicable Compliance Method:
If required by Ohio EPA or Cleveland DAQ, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03 (B)(10).
 - b. Emission Limitation:
14.8 tpy of particulate emissions

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- c. Emission Limitation:
0.98 lb/hr of PM₁₀ emissions

Applicable Compliance Method:

Compliance with the mass emission limitation shall be demonstrated by multiplying the PE emission rate, in lb/hr, by an emission factor (EF) of 0.29. The PM₁₀ emission factor was determined from a PM₁₀ particle size distribution analysis performed by HB Engineering, Inc. and EDP Consultants, Inc. in March, 2004.

If required by Ohio EPA or Cleveland DAQ, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 201.

- d. Emission Limitation:
4.29 tpy of PM₁₀ emissions

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- e. Emission Limitation:
Visible emissions from each scrubber outlet shall not exceed 10 percent opacity, as a six-minute average, during any sixty-minute observation period.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P016 - Continuous strand tempering furnace (No. 4) using a lead heat transfer medium with a graphite and pea coke cover layer and oil quench	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-11
	OAC rule 3745-17-07(A)(1)

Applicable Emissions
Limitations/Control Measures

emission limitation established
pursuant to OAC rule
3745-31-05(A)(3).

Particulate emissions (PE) shall not exceed 1.38 lbs/hr and 6.04 tons per year.

Lead emissions shall not exceed 0.135 lb/hr and 0.59 ton per year.

Carbon monoxide emissions shall not exceed 0.58 lb/hr and 2.54 tons per year.

Organic compound emissions shall not exceed 0.08 lb/hr and 0.35 tons per year.

Sulfur dioxide emissions shall not exceed 0.01 lb/hr and 0.04 tons per year.

Nitrogen oxide emissions shall not exceed 0.69 lb/hr and 3.02 tons per year.

Visible emissions from any stack shall not exceed 10 percent opacity, as a six-minute average, during any sixty-minute observation period.

The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation established by this rule is less stringent than the

2. Additional Terms and Conditions

2.a None.

B. Operational Restrictions

1. The permittee shall adequately suppress any fumes using a graphite and pea coke cover layer while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record any times when the graphite and pea coke layer for emissions unit P016 is not adequately suppressing fumes.

D. Reporting Requirements

1. The permittee shall submit fume suppression quarterly deviation (excursion) reports to the Cleveland Division of Air Quality (Cleveland DAQ) reports that identify all periods of time during which the graphite and pea coke layer did not adequately suppress any fumes. If there was no deviation, then the permittee does not need to submit a "no deviation" report.

E. Testing Requirements

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

- a. Emission Limitation:
1.38 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance may be determined by multiplying a controlled particulate emission factor of 0.228 pounds PE/ton (based on emission testing conducted in July, 1995) by the maximum process weight of the emissions unit (2.0 ton/hr).

If required by Ohio EPA or Cleveland DAQ, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03 (B)(10).

- b. Emission Limitation:
6.04 tpy of particulate emissions

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- c. Emission Limitation:
0.135 lb/hr of lead emissions

Applicable Compliance Method:

Compliance may be determined by multiplying a controlled lead emission factor of 0.0674 pounds Pb/ton (based on emission testing conducted in July, 1995) by the maximum process weight of the emissions unit (2.0 ton/hr).

If required by Ohio EPA or Cleveland DAQ, compliance with the mass emission limitation shall be demonstrated by using Method 12 as outlined in 40 CFR Part 60, Appendix A.

- d. Emission Limitation:
0.59 tons per year of lead emissions

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- e. Emission Limitation:
0.58 lb/hr of carbon monoxide emissions

Applicable Compliance Method:

To determine compliance use the emission factor (EF) for CO, 35.0 lbs/MM scf, taken from U.S. EPA AP-42 "Compilation of Air pollutant Emission Factors," Section 1.4, Natural Gas Combustion, 7/98 in the following equation:

$$(\text{MM scf/hr}) \times (\text{lb/MM scf}) = \text{lb/hr CO}$$

If required by Ohio EPA or Cleveland DAQ, compliance with the above hourly carbon monoxide limitation shall be determined by Method 10 of 40 CFR Part 60, Appendix A.

- f. Emission Limitation:
2.54 tons per year of carbon monoxide emissions

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- g. Emission Limitation:
0.08 lb/hr of organic compound emissions

Applicable Compliance Method:

To determine compliance use the emission factor (EF) for OC, 11.0 lbs/MM scf, taken from U.S. EPA AP-42 "Compilation of Air pollutant Emission Factors," Section 1.4, Natural Gas Combustion, 7/98 in the following equation:

$$(\text{MM scf/hr}) \times (\text{lb/MM scf}) = \text{lb/hr OC}$$

If required by Ohio EPA or Cleveland DAQ, compliance with the above hourly organic compound limitation shall be determined by Method 25 of 40 CFR Part 60, Appendix A.

- h. Emission Limitation:
0.35 ton per year of organic compound emissions

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- i. Emission Limitation:
0.01 lb/hr of sulfur dioxide emissions

Applicable Compliance Method:

To determine compliance use the emission factor (EF) for SO₂, 0.6 lbs/MM scf, taken from U.S. EPA AP-42 "Compilation of Air pollutant Emission Factors," Section 1.4, Natural Gas Combustion, 7/98 in the following equation:

$$(\text{MM scf/hr}) \times (\text{lb/MM scf}) = \text{lb/hr SO}_2$$

If required by Ohio EPA or Cleveland DAQ, compliance with the above hourly sulfur

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dioxide limitation shall be determined by Method 6 of 40 CFR Part 60, Appendix A.

- j. Emission Limitation:
0.04 ton per year of sulfur dioxide emissions

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- k. Emission Limitation:
0.69 lb/hr of nitrogen oxide emissions

Applicable Compliance Method:

To determine compliance use the emission factor (EF) for NO_x, 100 lbs/MM scf, taken from U.S. EPA AP-42 "Compilation of Air pollutant Emission Factors," Section 1.4, Natural Gas Combustion, 7/98 in the following equation:

$$(\text{MM scf/hr}) \times (\text{lb/MM scf}) = \text{lb/hr NO}_x$$

If required by Ohio EPA or Cleveland DAQ, compliance with the above hourly nitrogen oxide limitation shall be determined by Method 7 of 40 CFR Part 60, Appendix A.

- l. Emission Limitation:
3.02 tons per year of nitrogen oxide emissions

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- m. Emission Limitation:
Visible emissions from the scrubber outlet shall not exceed 10 percent opacity, as a six-minute average, during any sixty-minute observation period.

Applicable Compliance Method:

If required by Ohio EPA or Cleveland DAQ, compliance shall be determined through visible emission observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures in OAC rule 3745-17-03(B)(1).

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F. Miscellaneous Requirements

None.