



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: 13-04550**

**Fac ID: 1318202137**

**DATE: 9/15/2005**

The Lincoln Electric Company  
Kathy Gargasz  
22801 St. Clair Ave  
Cleveland, OH 44117-1199

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*

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

CLAA



---

**Permit To Install  
Terms and Conditions**

**Issue Date: 9/15/2005  
Effective Date: 9/15/2005**

---

**FINAL PERMIT TO INSTALL 13-04550**

Application Number: 13-04550  
Facility ID: 1318202137  
Permit Fee: **\$1500**  
Name of Facility: The Lincoln Electric Company  
Person to Contact: Kathy Gargasz  
Address: 22801 St. Clair Ave  
Cleveland, OH 44117-1199

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**22801 St. Clair Ave.  
Cleveland, Ohio**

Description of proposed emissions unit(s):  
**Modification to Calcining Kiln -- P021.**

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. State and Federally Enforceable Permit-To-Install General Terms and Conditions

#### 1. Monitoring and Related Recordkeeping 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.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.8 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 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, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

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

## 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.

#### 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.

#### 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.

#### 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 re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**The Lincoln Electric Company**  
**PTI Application: 13-04550**  
**Issued: 9/15/2005**

**Facility ID: 1318202137**

## **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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

## **8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- 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 ORC section 3704.08.
  - 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.

#### 10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

#### 11. 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.

**The Lincoln Electric Company**  
**PTI Application: 13-04550**  
**Issued: 9/15/2005**

**Facility ID: 1318202137**

**12. 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.

**The Lincoln Electric Company**  
**PTI Application: 13-04550**  
**Issued: 9/15/2005**

**Facility ID: 1318202137**

### **13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

## **B. State Only Enforceable Permit-To-Install General Terms and Conditions**

### **1. Compliance Requirements**

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

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the 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 state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

**The Lincoln Electric Company**  
**PTI Application: 13-04550**  
**Issued: 9/15/2005**

**Facility ID: 1318202137**

The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

The Lincoln Electric Company  
PTI Application: 13-04550  
Issued: 9/15/2005

Facility ID: 1318202137

**4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or 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.

**5. Construction of New Sources(s)**

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

**6. 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.

**7. Applicability**

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

**8. Construction Compliance Certification**

The Lincoln Electric Company  
 PTI Application: 13-04550  
 Issued: 9/15/2005

Facility ID: 1318202137

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

**9. 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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**C. 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	11.39
PM10	8.76
NOx	6.57
CO	5.48

**The Lincoln Electric Company**  
**PTI Application: 13-04550**  
**Issued: 9/15/2005**

**Facility ID: 1318202137**

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None.

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None.

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
P021 - Calcining operation, equipped with a 13.5 mmBtu/hr natural gas burner and baghouse for control of particulate emissions	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-08(B)
Modified	OAC rule 3745-23-06(B)
	OAC rule 3745-17-07(A)
	OAC rule 3745-17-11(B)
	OAC rule 3745-17-10(B)(1)

**The L  
PTI A  
Issued: 9/15/2005**

Emissions Unit ID: **P021**

Applicable Emissions  
Limitations/Control  
Measures

natural gas burner  
emissions:  
0.10 lb/hr of PE  
emissions and 0.44 TPY  
1.50 lbs/hr NOx  
emissions and 6.57 TPY  
1.25 lbs/hr CO emissions  
and 5.48 TPY

Calciner emissions:  
2.5 lbs/hr of PE emissions  
and 10.95 TPY  
2.0 lbs/hr of PM10  
emissions and 8.76 TPY

The requirements of this  
rule also include  
compliance with the  
requirements of 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 rule.

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

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

See Section A.2.a. below.

See Section A.2.b. below.

## 2. Additional Terms and Conditions

- 2.a** The permittee shall satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.b** The permittee shall satisfy the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On February 15, 2005, OAC rule 3745-23-06 was rescinded; therefore, this rule is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the U.S. EPA approves the revision to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

## II. Operational Restrictions

1. The permittee shall operate the baghouse while the emissions unit is in operation.
2. The pressure drop across the baghouse shall be maintained within the range of 1-8 inches of water while the emissions unit is in operation.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio

EPA, compliance with the mass emission limitation and visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using US EPA - approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitation.

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be 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.
2. 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.

**The Lincoln Electric Company**  
**PTI Application: 12 04550**  
**Issue**

**Facility ID: 1318202137**

**Emissions Unit ID: P021**

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ that identify all periods of time during which the pressure drop across the baghouse did not comply with the requirements specified above.
2. 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 Cleveland DAQ 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 limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation -  
Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.  
  
Applicable Compliance Method(s) -  
Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1) using the methods and procedures specified in USEPA Reference Method 9.
  - b. Emission Limitation -  
0.10 lb/hr of PE emissions from the natural gas burner  
  
Applicable Compliance Method -  
Compliance with the hourly emission limit may be determined by multiplying the maximum hourly natural gas usage of each emissions unit (0.0135 mmcf/hr) by the U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2(7/98) emission factor for PM/PM10 (1.9 lbs PM/PM10/mmcf).  
  
If required, the permittee shall demonstrate compliance with the lbs/hr emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and 201.

- c. Emission Limitation:  
0.44 TPY of PE emissions from the natural gas burner

Applicable Compliance Method:

The annual allowable emission limitation was developed by multiplying the hourly allowable emission rate by a maximum operating schedule of 8,760 hours per year, and dividing by 2000 lbs per ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be assumed.

- d. Emission Limitation -  
1.50 lbs/hr of NOx emissions from the natural gas burner

Applicable Compliance Method -

Compliance with the hourly emission limit may be determined by multiplying the maximum hourly natural gas usage of each emissions unit (0.0135 mmcf/hr) by the U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1(7/98) emission factor for NOx (100 lbs NOx/mmcf).

If required, the permittee shall demonstrate compliance with the lbs/hr emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

- e. Emission Limitation:  
6.57 TPY of NOx emissions from the natural gas burner

Applicable Compliance Method:

The annual allowable emission limitation was developed by multiplying the hourly allowable emission rate by a maximum operating schedule of 8,760 hours per year, and dividing by 2000 lbs per ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be assumed.

- f. Emission Limitation -  
1.25 lbs/hr of CO emissions from the natural gas burner

Applicable Compliance Method -

Compliance with the hourly emission limit may be determined by multiplying the

Emissions Unit ID: P021

maximum hourly natural gas usage of each emissions unit (0.0135 mmcf/hr) and the U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1(7/98) emission factor for CO (84 lbs CO/mmcf).

If required, the permittee shall demonstrate compliance with the lbs/hr emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

- g. Emission Limitation:  
5.48 TPY of CO emissions from the natural gas burner

Applicable Compliance Method:

The annual allowable emission limitation was developed by multiplying the hourly allowable emission rate by a maximum operating schedule of 8,760 hours per year, and dividing by 2000 lbs per ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be assumed.

- h. Emission Limitation -  
2.50 lbs/hr of PE emissions from the calcining operation

Applicable Compliance Method -

Compliance shall be based upon the results of the emission testing specified in section A.V.2.

- i. Emission Limitation:  
10.95 TPY of PE emissions from the calcining operation

Applicable Compliance Method:

The annual allowable emission limitation was developed by multiplying the hourly allowable emission rate by a maximum operating schedule of 8,760 hours per year, and dividing by 2000 lbs per ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be assumed.

- j. Emission Limitation -  
2.0 lbs/hr of PM10 emissions from the calcining operation

Applicable Compliance Method -

Compliance shall be based upon the results of the emission testing specified in section A.V.2.

- k. Emission Limitation:

8.76 TPY of PM10 emissions from the calcining operation

Applicable Compliance Method:

The annual allowable emission limitation was developed by multiplying the hourly allowable emission rate by a maximum operating schedule of 8,760 hours per year, and dividing by 2000 lbs per ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be assumed.

2. Emission testing shall be conducted within 6 months after installation. The emission testing shall be conducted to demonstrate compliance with the particulate emission limitations.

The test(s) shall be conducted while emissions unit P021 is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.

The following test methods shall be employed to demonstrate compliance with the emission limitations: Methods 1 through 5 of 40 CFR Part 60, Appendix A for particulate emissions. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The permittee shall also demonstrate compliance with the PE10 emission limitation through particle size distribution analysis.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. 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 DAQ's refusal to accept the results of the emission test(s).

Personnel from the Cleveland DAQ 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 Cleveland DAQ

**The Lincoln Electric Company**  
**PTI Application: 13-04550**  
**Issue:**

**Facility ID: 1318202137**

**Emissions Unit ID: P021**

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 DAQ.

**VI. Miscellaneous Requirements**

None.

**B. State Only Enforceable Section**

**I. 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>
P021 - Calcining operation, equipped with a 13.5 mmBtu/hr natural gas burner and baghouse for control of particulate emissions  <b>Modified</b>		

2. **Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

None.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

25

**The L**

**PTI A**

**Issued: 9/15/2005**

Emissions Unit ID: **P021**

None.

**VI. Miscellaneous Requirements**

None.