



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
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: 13-03768

DATE: 4/19/2001

North American Wire Products Corporation
Donald Delapa
30000 Solon Road
Solon, OH 44139

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

CBAPC



**Permit To Install
Terms and Conditions**

**Issue Date: 4/19/2001
Effective Date: 4/19/2001**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 13-03768

Application Number: 13-03768
APS Premise Number: 1318531037
Permit Fee: **\$1200**
Name of Facility: North American Wire Products Corporation
Person to Contact: Donald Delapa
Address: 30000 Solon Road
Solon, OH 44139

Location of proposed air contaminant source(s) [emissions unit(s)]:
**30000 Solon Road
Solon, Ohio**

Description of proposed emissions unit(s):
Modification to PTL.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

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 Related to Monitoring and Recordkeeping 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

North American Wire Products Corporation
PTI Application: 13-03768
Issued: 4/19/2001

Facility ID: 1318531037

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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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

- 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 To Install 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

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>
NO _x	8.8
CO	7.4
H ₂ SO ₄	0.9
NH ₄ CL fumes	3.3

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>
Patenting furnace line equipped with austenitizing furnace (gas-fired only, 4.75 mmbtu), lead quench furnace (gas-fired only, 1.98 mmbtu) and pickling tanks controlled by a two-stage packed scrubber.	OAC rule 3745-31-05(A)(3)	0.68 lbs/hr and 3.0 tpy NO _x emissions, 0.57 lbs/hr and 2.5 tpy CO emissions, 0.2 lbs/hr and 0.9 tpy H ₂ SO ₄ emissions

2. Additional Terms and Conditions

2.a None

B. Operational Restrictions

- 1. The pH of the scrubber liquor shall be maintained at or above 9 while the emissions unit is in operation.
- 2. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 2.0 inches of water at all times while the emissions unit is in operation.
- 3. The scrubber water flow rate shall be continuously maintained at a value of not less than 60 gallons per minute at all times while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

The permittee shall properly install, operate and maintain equipment to continuously monitor and record the pH of the scrubber liquor while the emissions unit is in operation. The pH monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

- 1. The permittee shall collect and record the following information each day:

- a. The pH of the scrubber liquor, on daily basis.
 - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate 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.

The permittee shall collect and record the following information each day:

- a. The pressure drop across the scrubber, in inches of water, on daily basis.
- b. The scrubber water flow rate, in gallons per minute, on daily basis.
- c. 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 pH deviation (excursion) reports that identify all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified above. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
 - a. The static pressure drop across the scrubber.
 - b. The scrubber water flow rate.

Each report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
0.68 lbs/hr and 3.0 tpy NO_x

Applicable Compliance Method:

Compliance with the hourly emission limitation is based upon the potential to emit from both the austenitizing and lead quench furnaces. Therefore, no hourly records are required to demonstrate compliance with this limit. Potential to emit calculations were determined by multiplying the emission factor for NO_x (100 lb/mm³.ft), (U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.4 Table 1.4-1(7/98)), by the maximum combined hourly gas burning capacity (0.00673 mm³.ft/hr) of both emissions units.

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by the maximum annual operating schedule of 8,760 hrs/yr and then dividing by 2,000 lbs/ton).

- b. Emission Limitation:
0.57 lbs/hr and 2.5 tpy CO

Applicable Compliance Method:

Compliance with the hourly emission limitation is based upon the potential to emit from both austenitizing and lead quench furnaces. Therefore, no hourly records are required to demonstrate compliance with this limit. Potential to emit calculations were determined by multiplying the emission factor for CO (84 lb/mm³.ft), (U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.4 Table 1.4-1(7/98)), by the maximum combined hourly gas burning capacity (0.006730 mm³.ft/hr) of both emissions units.

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by the maximum annual operating schedule of 8,760 hrs/yr and then dividing by 2,000 lbs/ton).

- c. Emission Limitation:
0.2 lbs/hr and 0.9 tpy H₂SO₄

Applicable Compliance Method:

Compliance with the hourly H₂SO₄ emission limitation shall be determined in accordance with the test methods and procedures in Method 8 of 40 CFR Part 60, Appendix A, if

North American Wire Products Corporation

PTI Application: 13-02768

Issued

Facility ID: 1318531037

Emissions Unit ID: P008

required by Ohio EPA.

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by the maximum annual operating schedule of 8,760 hrs/yr and then dividing by 2,000 lbs/ton).

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>
Galvanizing line equipped with fluidized bed stress relieving furnace (gas-fired only, 10.26 mmbtu), wire drying (gas-fired only, 1.0 mmbtu), hot-dip galvanizing furnace (gas-fired only, 1.9 mmbtu) and gas wipe box (gas-fired only, 0.11238 mmbtu)	OAC rule 3745-31-05(A)(3)	1.33 lbs/hr and 5.8 tpy NO _x emissions, 1.11 lbs/hr and 4.9 tpy CO emissions, 0.75 lbs/hr and 3.3 tpy NH ₄ CL emissions

2. Additional Terms and Conditions

2.a None

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

The permit to install for this emissions unit P009 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of

the modeling for the "worst case" pollutant(s):

Pollutant: Ammonium chloride fume (NH₄CL)

TLV (mg/m³): 10

Maximum Hourly Emission Rate (lbs/hr): 0.75

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 64.59

MAGLC (ug/m³): 238

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

North American Wire Products Corporation

PTI Application: 13-02768

Issued

Facility ID: 1318531037

Emissions Unit ID: **P009**

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

None

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
1.33 lbs/hr and 5.8 tpy NO_x

Applicable Compliance Method:

Compliance with the hourly emission limitation is based upon the potential to emit from both the austenitizing and lead quench furnaces the fluidized bed stress relieving furnace, wire drying, hot-dip galvanizing and gas wipe box. Therefore, no hourly records are required to demonstrate compliance with this limit. Potential to emit calculations were determined by multiplying the emission factor for NO_x (100 lb/mm³.ft), (U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.4 Table 1.4-1(7/98)), by the maximum combined hourly gas burning capacity (0.013272 mm³.ft/hr) of both emissions units.

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by the maximum annual operating schedule of 8,760 hrs/yr and then dividing by 2,000 lbs/ton).

- b. Emission Limitation:
1.11 lbs/hr and 4.9 tpy CO

Applicable Compliance Method:

Compliance with the hourly emission limitation is based upon the potential to emit from both the austenitizing and lead quench furnaces the fluidized bed stress relieving furnace, wire drying, hot-dip galvanizing and gas wipe box. Therefore, no hourly records are required to demonstrate compliance with this limit. Potential to emit calculations were determined by multiplying the emission factor for CO (84 lb/mm³.ft), (U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.4 Table 1.4-1(7/98)), by the maximum combined hourly gas burning capacity (0.013272 mm³.ft/hr) of both emissions units.

North American Wire Products Corporation

PTI Application: 12-02768

Issued

Facility ID: 1318531037

Emissions Unit ID: P009

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by the maximum annual operating schedule of 8,760 hrs/yr and then dividing by 2,000 lbs/ton).

- c. Emission Limitation:
0.75 lbs/hr and 3.3 tpy NH₄CL emissions

Applicable Compliance Method:

Compliance with the hourly emission limitation is based upon the maximum coating rate of 0.75 lbs/hr. The coating on the wire is the result of ammonia chloride/water solution flux tank. Therefore, no hourly records are required to demonstrate compliance with this limit.

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by the maximum annual operating schedule of 8,760 hrs/yr and then dividing by 2,000 lbs/ton).

F. Miscellaneous Requirements

None

Emissions Unit ID: P009

SIC CODE 3315 SCC CODE 3-04-040-01 EMISSIONS UNIT ID P008

EMISSIONS UNIT DESCRIPTION Patenting furnace line equipped with austenitizing furnace (gas-fired only, 4.75 mmbtu), lead quench furnace (gas-fired only, 1.98 mmbtu) and pickling tanks controlled by a two-stage packed scrubber.

DATE INSTALLED 4/1/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides		0.68 lbs/hr	2.5	0.68 lbs/hr	3.0
Carbon Monoxide		0.57 lbs/hr	2.1	0.57 lbs/hr	2.5
Lead					
Other: H ₂ SO ₄		0.2 lbs/hr	0.3	0.2 lbs/hr	0.9

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
The BAT determination consists of the use of a scrubber and the following emissions limits: 0.68 lbs/hr and 3.0 tpy NO_x, 0.57 lbs/hr and 2.5 tpy CO, 0.2 lbs/hr and 0.9 tpy H₂SO₄. The basis for this determination is the knowledge of the source and the regulations governing it.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

1 NEW SOURCE REVIEW FORM B

PTI Number: 13-03768m1

Facility ID: 1318531037

FACILITY NAME North American Wire Products Corporation

FACILITY DESCRIPTION Steel wire heat treating and zinc

CITY/TWP Solon

Emissions Unit ID: P009

SIC CODE 3315

SCC CODE 3-04-040-01

EMISSIONS UNIT ID P009

EMISSIONS UNIT DESCRIPTION Galvanizing line equipped with fluidized bed stress relieving furnace (gas-fired only, 10.26 mmbtu), wire drying (gas-fired only, 1.0 mmbtu), hot-dip galvanizing furnace (gas-fired only, 1.9 mmbtu) and gas wipe box (gas-fired only, 0.11238 mmbtu)

DATE INSTALLED 4/1/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides		1.33 lbs/hr	4.9	1.33 lbs/hr	5.8
Carbon Monoxide		1.11 lbs/hr	4.1	1.11 lbs/hr	4.9
Lead					
Other: NH ₄ CL		0.75 lbs/hr	2.8	0.75 lbs/hr	3.3

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

The BAT determination consists of the use of emissions limits: 1.33 lbs/hr and 5.8 tpy NO_x, 1.11 lbs/hr and 4.9 tpy CO, 0.75 lbs/hr and 3.3 tpy NH₄CL. The basis for this determination is the knowledge of the source, engineering analysis and the regulations governing it.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Ammonium Chloride fumes

ADMINISTRATIVE MODIFICATION
INTER-OFFICE COMMUNICATION

18 NEW SOURCE REVIEW FORM B

PTI Number: 13-03768m1

Facility ID: 1318531037

FACILITY NAME North American Wire Products Corporation

FACILITY DESCRIPTION Steel wire heat treating and zinc
electrogalvanizing line

CITY/TWP Solon

TO: DAPC, Air Quality Modeling and Planning

FROM: David Hearne, Chief of Air Pollution Control Engineering

DATE: March 7, 2001

SUBJECT: Administrative Modification of Permit to Install # 13-03768.

Please find the following modification to a permit to install an air pollution source issued by the Ohio Environmental Protection Agency. Please feel free to contact David Hearne at 216-664-2178 with any questions regarding this modification.

Action initiated by: ___ Permittee

__X_DO/laa

___ This modification is the result of an appeal to the Environmental Review Appeals Commission

Description of the basis for the modification and a description of how the permit is being modified: There are errors in the description of equipment in P009 E.A.1 and E.A.2. I corrected the errors.

Additional comments:

NEW SOURCE REVIEW FORM B

PTI Number: 13-03768m1

Facility ID: 1318531037

FACILITY NAME North American Wire Products Corporation

FACILITY

Emissions Unit ID: P008

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electron ic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Har d Cop y</u>	<u>Non e</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	1303768c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input checked="" type="checkbox"/>	1303768s.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or Netting Determination

Permit To Install ENTER PTI NUMBER HERE

A. Source Description

B. Facility Emissions and Attainment Status

C. Source Emissions

D. Conclusion

20 NEW SOURCE REVIEW FORM B

PTI Number: 13-03768m1

Facility ID: 1318531037

FACILITY NAME North American Wire Products Corporation

FACILITY

Emissions Unit ID: **P008**

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
NOx	8.8
CO	7.4
H ₂ SO ₄	0.9
NH ₄ CL fumes	3.3

21 **NEW SC**

PTI Num

FACILITY

FACILITY DESCRIPTION

Steel wire heat treating and zinc
electrogalvanizing line

CITY/TWP

Emissions Unit ID: **P008** _____

Solon
