



9/22/2014

J. OBERLIN  
I. SCHUMANN & COMPANY  
22500 ALEXANDER RD  
OAKWOOD VILLAGE, OH 44146

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318402645  
Permit Number: P0115415  
Permit Type: Renewal  
County: Cuyahoga

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Plain Dealer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall Permit Review/Development Section Ohio EPA, DAPC 50 West Town Street Suite 700 PO Box 1049 Columbus, Ohio 43216-1049	and	Cleveland Division of Air Quality 2nd Floor 75 Erieview Plaza Cleveland, OH 44114
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Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

Erica R. Engel-Ishida, Interim Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification  
CDAQ; Pennsylvania; Canada





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination (FEPTIO to avoid Title V)

Netting Determination

2. Source Description:

I. Schumann Company operates five rotary melting furnaces (emissions units P003, P004, P005, P006, and P008) that are controlled by baghouses, and two electric induction furnaces (P009 and P010) that are controlled by a baghouse. All of the furnaces are used for melting raw material for recycling and reformation into ingots as brass or bronze. Emissions units P009 and P010 are subject to the New Source Performance Standard Subpart M. And the facility operations overall are subject to the Generally Achievable Control Technology Subpart TTTTTT.

3. Facility Emissions and Attainment Status:

The total facility particulate emissions have been restricted to less than 93 tons per rolling, 12-month summation through FEPTIO permit P0095703 issued on 12/15/2010. The 2013 Fee Emissions Report for I. Schumann reported total actual particulate emissions of approximately 21 tons/year (filterable) and 6.5 tons/year (condensable). Cuyahoga County is currently designated as non-attainment for ozone and partial non-attainment for lead.

4. Source Emissions:

I. Schumann employs the use of several baghouses to control emissions from all of the melting furnaces. The baghouses are needed in order to comply with both State and Federal rule requirements. I. Schumann has also accepted restrictions on the hours of operation as a rolling, 12-month summation that restricts the annual particulate emissions on a rolling, 12-month summation for each emissions unit. The total facility particulate emissions have been restricted to 92.29 tons per rolling, 12-month summation. The facility must maintain monthly records of the rolling, 12-month summation of the operating hours.

5. Conclusion:

By restricting the annual operating hours for each emissions unit as a rolling, 12-month summation and limiting total facility particulate emissions to 92.29 tons per rolling, 12-month summation, I. Schumann is not a major source and is not subject to the Title V permitting requirements.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
PE	92.29



PUBLIC NOTICE  
9/22/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

I. SCHUMANN & COMPANY

22500 ALEXANDER RD,  
Bedford, OH 44146

Cuyahoga County

FACILITY DESC.: Secondary Smelting, Refining, and Alloying of Copper

PERMIT #: P0115415

PERMIT TYPE: Renewal

PERMIT DESC: FEPTIO renewal permit for emissions units P003, P004, P005, P006, and P008 which are all rotary melting furnaces controlled with baghouses. Emissions units P009 and P010, which are electric induction furnaces controlled by a baghouse, have been added to the FEPTIO. PTIO 13-04754 for P009 and P010 was issued on 9/16/2008 and modified on 12/15/2010.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: David Hearne, Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114. Ph: (216)664-2297





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
I. SCHUMANN & COMPANY**

Facility ID:	1318402645
Permit Number:	P0115415
Permit Type:	Renewal
Issued:	9/22/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
I. SCHUMANN & COMPANY**

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**Draft Permit-to-Install and Operate**

I. SCHUMANN & COMPANY

**Permit Number:** P0115415

**Facility ID:** 1318402645

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 1318402645  
Application Number(s): A0048270, A0050450  
Permit Number: P0115415  
Permit Description: FEPTIO renewal permit for emissions units P003, P004, P005, P006, and P008 which are all rotary melting furnaces controlled with baghouses. Emissions units P009 and P010, which are electric induction furnaces controlled by a baghouse, have been added to the FEPTIO. PTIO 13-04754 for P009 and P010 was issued on 9/16/2008 and modified on 12/15/2010.  
Permit Type: Renewal  
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 9/22/2014  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

I. SCHUMANN & COMPANY  
22500 ALEXANDER RD  
Bedford, OH 44146

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

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

Cleveland Division of Air Quality  
2nd Floor  
75 Erieview Plaza  
Cleveland, OH 44114  
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0115415

Permit Description: FEPTIO renewal permit for emissions units P003, P004, P005, P006, and P008 which are all rotary melting furnaces controlled with baghouses. Emissions units P009 and P010, which are electric induction furnaces controlled by a baghouse, have been added to the FEPTIO. PTIO 13-04754 for P009 and P010 was issued on 9/16/2008 and modified on 12/15/2010.

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

<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	Rotary Melting Furnace No. 3
Superseded Permit Number:	P0095703
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	Rotary Melting Furnace No. 4
Superseded Permit Number:	P0108039
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	Rotary Melting Furnace No. 5
Superseded Permit Number:	P0108039
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	Rotary Melting Furnace No. 6
Superseded Permit Number:	P0108039
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P008</b>
Company Equipment ID:	Rotary Melting Furnace No. 7
Superseded Permit Number:	P0108039
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P009</b>
Company Equipment ID:	Induction Furnace #1
Superseded Permit Number:	P0105751
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P010</b>
Company Equipment ID:	Induction Furnace #2
Superseded Permit Number:	P0105751
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install and Operate**

**I. SCHUMANN & COMPANY**

**Permit Number: P0115415**

**Facility ID: 1318402645**

**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Cleveland Division of Air Quality in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Draft Permit-to-Install and Operate**

**I. SCHUMANN & COMPANY**

**Permit Number: P0115415**

**Facility ID: 1318402645**

**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) B.4.

b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(1) c)(1), c)(2)a., d)(1), e)(1), f)(1) and g)(1).

c) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V	See c)(2) below.

(2) Additional Terms and Conditions

a. The particulate emissions from this facility shall not exceed 92.29 TPY, based on a rolling, 12-month summation.

b. The facility-wide emission limit shall include emissions from the following units: P003, P004, P005, P006, P007, P008, P009 and P010.



d) Operational Restrictions

- (1) The maximum annual operating hours for each emissions unit at this facility shall not exceed the following, based upon a rolling, 12-month summation of the operating hours:

P003	7,488 hours
P004, P005, P006	7,488 hours
P008	7,488hours
P009, P010	5,594 hours

e) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for each emissions unit:
  - a. the operating hours for each month; and
  - b. the rolling, 12-month summation of the operating hours.

f) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all exceedances of the rolling, 12-month restriction on the hours of operation.

g) Testing Requirements

- (1) Compliance with c)(2)a. can be demonstrated through yearly emissions reporting of actual emissions.

2. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subpart M, New Source Performance Standards (NSPS) for Secondary Brass and Bronze Production Plants: P008, P009, and P010. The complete NSPS requirements, including the NSPS Subpart A General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Cleveland Division of Air Quality (Cleveland DAQ).

The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart M. The permittee shall also comply with all applicable requirements of 40 CFR Part 60, Subpart A General Provisions. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 60, Subpart A, and Subpart M.

3. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart TTTTTT, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Nonferrous Metals Processing. At this time the Ohio EPA is not accepting the delegating authority to enforce NESHAP standards for area sources. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this rule (including the Part 63



**Draft Permit-to-Install and Operate**

I. SCHUMANN & COMPANY

**Permit Number:** P0115415

**Facility ID:** 1318402645

**Effective Date:** To be entered upon final issuance

General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the Cleveland Division of Air Quality.

4. As of December 31, 2011, the permittee shall maintain the stack height of baghouse stacks #1 and #4 according to the following:
  - a) baghouse stack #1 shall be maintained at a height of 59.6 feet and baghouse stack #4 shall be maintained at a height of 54 feet (an increase of 18 feet for both stacks above the height that existed prior to 5/12/2011).



**Draft Permit-to-Install and Operate**

**I. SCHUMANN & COMPANY**

**Permit Number: P0115415**

**Facility ID: 1318402645**

**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. P003, Rotary Melting Furnace No. 3**

**Operations, Property and/or Equipment Description:**

Rotary Melting Furnace No. 3 controlled by AAF baghouse No. 3, for melting raw material for recycling and reformation into ingots as brass or bronze .

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a., c)(1), d)(1), e)(1), f)(1)a., f)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V	Particulate emissions (PE) from the baghouse stack(s) serving this emissions unit shall not exceed 15.6 tons per rolling, 12-months.  Fugitive particulate matter shall not exceed 1.68 tons per rolling, 12-months.  See b)(2)a. and c)(1) below.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)	The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust.  See b)(2)b. below.
e.	OAC rule 3745-17-11(A)	Particulate emissions shall not exceed 4.81 lbs/hr.

(2) Additional Terms and Conditions

- a. For the purpose of this restriction, all particulate emissions are assumed to be equivalent to or greater than PM<sub>2.5</sub> and PM<sub>10</sub> emissions. As better test methods are developed to speciate PM<sub>2.5</sub>, these numbers may change.
- b. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirement:
  - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

c) Operational Restrictions

- (1) The maximum annual operating hours for this emission unit shall not exceed 7,488 hours, based upon a rolling, 12-month summation of the operating hours.
- (2) Slag skimmings shall be air cooled indoors adequately before being placed outdoors.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the operating hours for each month;
  - b. the tons of production for each month;
  - c. the rolling, 12-month summation of the operating hours; and
  - d. the rolling, 12-month summation of tons of production.



- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across baghouse #3 has been established to be not less than 2 inches of water.
- (3) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a once per shift basis. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.



This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions of fugitive dust shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit;



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- ii. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range; and
  - iii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse.
- b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by Cleveland DAQ.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
  - c. each incident of deviation described in a. (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.



- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(4) above:
  - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.
- f) Testing Requirements
  - (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
    - a. Emission Limitation:

PE shall not exceed 15.6 tons per rolling, 12-months.

Applicable Compliance Method:

Compliance with this emission limit may be based on an emission factor of 1.39 lbs/hour of filterable particulate emissions which was established through stack testing of the source. These stack tests were performed on September 16, 2009. The emission factor may be used to demonstrate compliance with the annual allowable emission rate by multiplying the 1.39 lbs/hr emission factor by actual hours of operation per rolling, 12-months and dividing by 2000 lbs/ton. The lb/hr emission factor shall be replaced with the most current stack test results if additional testing occurs.
    - b. Emission Limitation:

Fugitive PM emissions shall not exceed 1.68 tons per rolling, 12-months

Applicable Compliance Method:

Compliance shall be shown by using an engineering emission factor of 0.43 lbs fugitive PM per ton of metal processed multiplied by the tons of metal processed per rolling 12-months and divided by 2000 lbs/ton.
    - c. Emission Limitation:

Visible particulate emissions from the baghouse stacks shall not exceed 20% opacity as a six-minute average, except as specified by rule; and visible emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.



Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

Particulate emissions shall not exceed 4.81 lbs/hr

Applicable Compliance Method:

Compliance shall be determined using Methods 1 through 5 in accordance with 40 CFR, Part 60, Appendix A. Emissions units P003 and other secondary emissions are vented to AAF baghouse #3; therefore, compliance shall be determined based on the stack test results for this baghouse using the gr/dscf multiplied by the corresponding dscf air flow contribution to the baghouse from each emissions unit to determine the lb/hr emission rate. Alternatively, compliance may be determined by summing the allowable emission limits for all of the emissions units that are operating during the stack test and compare to the total lb/hr stack test result(s).

(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 within 12 months prior to permit expiration.
- b. The emission testing shall be conducted on baghouse #3 to demonstrate compliance with the allowable mass emission rate(s) for particulates, opacity, and lead emissions in the appropriate averaging period(s).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Particulates: Methods 1-5, 40 CFR Part 60, Appendix A

Opacity: Method 9, 40 CFR Part 60, Appendix A

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

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



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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).

- f. 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 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.

g) **Miscellaneous Requirements**

- (1) This emissions unit was installed in 1968.



**2. P004, Rotary Melting Furnace No. 4**

**Operations, Property and/or Equipment Description:**

Rotary Melting Furnace No. 4 controlled by Wheelabratorbaghouse No. 4, for melting raw material for recycling and reformation into ingots as brass or bronze.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a., c)(1), d)(1), e)(1), f)(1)a., f)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V	Particulate emissions (PE) from the baghouse stack(s) serving this emissions unit shall not exceed 11.16 tons per rolling, 12-months.  Fugitive particulate matter shall not exceed 0.37 tons per rolling, 12-months.  See b)(2)a. and c)(1) below.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)	The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust.  See b)(2)b. below.
e.	OAC rule 3745-17-11(A)	Particulate emissions shall not exceed 4.76 lbs/hr.

(2) Additional Terms and Conditions

- a. For the purpose of this restriction, all particulate emissions are assumed to be equivalent to or greater than PM<sub>2.5</sub> and PM<sub>10</sub> emissions. As better test methods are developed to speciate PM<sub>2.5</sub>, these numbers may change.
- b. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirement:
  - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

c) Operational Restrictions

- (1) The maximum annual operating hours for this emission unit shall not exceed 7,488 hours, based upon a rolling, 12-month summation of the operating hours.
- (2) Slag skimmings shall be air cooled indoors adequately before being placed outdoors.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the operating hours for each month;
  - b. the tons of production for each month;
  - c. the rolling, 12-month summation of the operating hours; and
  - d. the rolling, 12-month summation of tons of production.



- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across baghouse #4 has been established to be not less than 3 inches of water.
- (3) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a once per shift basis. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.



This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions of fugitive dust shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit;



- ii. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range; and
  - iii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse.
- b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by Cleveland DAQ.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
  - c. each incident of deviation described in a. (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.



- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(4) above:
- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
- a. Emission Limitation:  
PE shall not exceed 11.16 tons per rolling, 12-months.  
Applicable Compliance Method:  
Compliance with this emission limit may be based on an emission factor of 1.30 lbs/hour of filterable particulate emissions which was established through stack testing of the source. These stack tests were performed on May 11, 2005. The emission factor may be used to demonstrate compliance with the annual allowable emission rate by multiplying the 1.30 lbs/hr emission factor by actual hours of operation per rolling, 12-months and dividing by 2000 lbs/ton. The lb/hr emission factor shall be replaced with the most current stack test results if additional testing occurs..
  - b. Emission Limitation:  
Fugitive PM emissions shall not exceed 0.37 tons per rolling, 12-months  
Applicable Compliance Method:  
Compliance shall be shown by using an engineering emission factor of 0.43 lbs fugitive PM per ton of metal processed multiplied by the tons of metal processed per rolling 12-months and divided by 2000 lbs/ton.
  - c. Emission Limitation:  
Visible particulate emissions from the baghouse stacks shall not exceed 20% opacity as a six-minute average, except as specified by rule; and visible emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.



Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

d. Emission Limitation:

Particulate emissions shall not exceed 4.76 lbs/hr

Applicable Compliance Method:

Compliance shall be determined using Methods 1 through 5 in accordance with 40 CFR, Part 60, Appendix A. Emissions units P004 and P008 are vented to Wheelabratorbaghouse #4; therefore, compliance shall be determined based on the stack test results for this baghouse using the gr/dscf multiplied by the corresponding dscf air flow contribution to the baghouse from each emissions unit to determine the lb/hr emission rate. Alternatively, compliance may be determined by summing the allowable emission limits for all of the emissions units that are operating during the stack test and compare to the total lb/hr stack test result(s).

(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 within 12 months prior to permit expiration.
- b. The emission testing shall be conducted on baghouse #4 to demonstrate compliance with the allowable mass emission rate(s) for particulates, opacity, and lead emissions in the appropriate averaging period(s).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Particulates: Methods 1-5, 40 CFR Part 60, Appendix A

Opacity: Method 9, 40 CFR Part 60, Appendix A

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

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



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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).

- f. 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 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.

g) **Miscellaneous Requirements**

- (1) This emissions unit was installed in 1968.



**3. P005, Rotary Melting Furnace No. 5**

**Operations, Property and/or Equipment Description:**

Rotary Melting Furnace No. 5 controlled by Wheelabratorbaghouse No. 1 and AAF baghouse No. 3, for melting raw material for recycling and reformation into ingots as brass or bronze.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a., c)(1), d)(1), e)(1), f)(1)a., f)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V	Particulate emissions (PE) from the baghouse stack(s) serving this emissions unit shall not exceed 11.23 tons per rolling, 12-months.  Fugitive particulate matter shall not exceed 1.61 tons per rolling, 12-months.  See b)(2)a. and c)(1) below.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a three-minute average.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)	The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust.  See b)(2)b. below.
e.	OAC rule 3745-17-11(A)	Particulate emissions shall not exceed 5.04 lbs/hr.

(2) Additional Terms and Conditions

- a. For the purpose of this restriction, all particulate emissions are assumed to be equivalent to or greater than PM<sub>2.5</sub> and PM<sub>10</sub> emissions. As better test methods are developed to speciate PM<sub>2.5</sub>, these numbers may change.
- b. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirement:
  - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

c) Operational Restrictions

- (1) The maximum annual operating hours for this emission unit shall not exceed 7,488 hours, based upon a rolling, 12-month summation of the operating hours.
- (2) Slag skimmings shall be air cooled indoors adequately before being placed outdoors.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the operating hours for each month;
  - b. the tons of production for each month;
  - c. the rolling, 12-month summation of the operating hours; and
  - d. the rolling, 12-month summation of tons of production.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across baghouse #1 has been established to be not less than 3 inches of water; the acceptable pressure drop across baghouse #3 has been established to be not less than 2 inches of water.



- (3) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a once per shift basis. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information



obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions of fugitive dust shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit;
    - ii. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range; and



- iii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by Cleveland DAQ.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
  - c. each incident of deviation described in a. (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(4) above:



- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
    - a. Emission Limitation:

PE shall not exceed 11.23 tons per rolling, 12-months.

Applicable Compliance Method:

Compliance with this emission limit may be based on an emission factor of 2.00 lbs/hour of filterable particulate emissions which was established through stack testing of the source. These stack tests were performed on March 27, 2009 and September 16, 2009. The emission factor may be used to demonstrate compliance with the annual allowable emission rate by multiplying the 2.00 lbs/hr emission factor by actual hours of operation per rolling, 12-months and dividing by 2000 lbs/ton. The lb/hr emission factor shall be replaced with the most current stack test results if additional testing occurs.
    - b. Emission Limitation:

Fugitive PM emissions shall not exceed 1.61 tons per rolling, 12-months

Applicable Compliance Method:

Compliance shall be shown by using an engineering emission factor of 0.43 lbs fugitive PM per ton of metal processed multiplied by the tons of metal processed per rolling 12-months and divided by 2000 lbs/ton.
    - c. Emission Limitation:

Visible particulate emissions from the baghouse stacks shall not exceed 20% opacity as a six-minute average, except as specified by rule; and visible emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A..



d. Emission Limitation:

Particulate emissions shall not exceed 5.04 lbs/hr

Applicable Compliance Method:

Compliance shall be determined using Methods 1 through 5 in accordance with 40 CFR, Part 60, Appendix A. Emissions units P005 and P006 are vented to Wheelabratorbaghouse #1; therefore, compliance shall be determined based on the stack test results for this baghouse using the gr/dscf multiplied by the corresponding dscf air flow contribution to the baghouse from each emissions unit to determine the lb/hr emission rate. Alternatively, compliance may be determined by summing the allowable emission limits for all of the emissions units that are operating during the stack test and compare to the total lb/hr stack test result(s).

(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 within 12 months prior to permit expiration.

b. The emission testing shall be conducted on baghouses #1 and #3 to demonstrate compliance with the allowable mass emission rate(s) for particulates, opacity, and lead emissions in the appropriate averaging period(s). The testing of baghouse #1 does not have to be simultaneous with the testing for baghouse #3. When testing an individual baghouse, all vented emissions units must operate during the test unless a vented source doesn't operate at the same time such as the casting line and/or ladle carriage side draft hood. Arrangements shall be made with the Cleveland Division of Air Quality (Cleveland DAQ) prior to the testing event and identified in the "Intent to Test" notification.

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

Particulates: Methods 1-5, 40 CFR Part 60, Appendix A

Opacity: Method 9, 40 CFR Part 60, Appendix A

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

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

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 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),



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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).

- f. 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 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.

g) **Miscellaneous Requirements**

- (1) This emissions unit was installed in 1968.



**4. P006, Rotary Melting Furnace No. 6**

**Operations, Property and/or Equipment Description:**

Rotary Melting Furnace No. 6 controlled by Wheelabratorbaghouse No. 1 and Wheelabratorbaghouse No. 4, for melting raw material for recycling and reformation into ingots as brass or bronze.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a., c)(1), d)(1), e)(1), f)(1)a., f)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V	Particulate emissions (PE) from the baghouse stack(s) serving this emissions unit shall not exceed 17.82 tons per rolling, 12-months.  Fugitive particulate matter shall not exceed 3.01 tons per rolling, 12-months.  See b)(2)a. and c)(1) below.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)	The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust. See b)(2)b. below.
e.	OAC rule 3745-17-11(A)	Particulate emissions shall not exceed 7.83 lbs/hr.

(2) Additional Terms and Conditions

- a. For the purpose of this restriction, all particulate emissions are assumed to be equivalent to or greater than  $PM_{2.5}$  and  $PM_{10}$  emissions. As better test methods are developed to speciate  $PM_{2.5}$ , these numbers may change.
- b. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirement:
  - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

c) Operational Restrictions

- (1) The maximum annual operating hours for this emission unit shall not exceed 7,488 hours, based upon a rolling, 12-month summation of the operating hours.
- (2) Slag skimmings shall be air cooled indoors adequately before being placed outdoors.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the operating hours for each month;
  - b. the tons of production for each month;
  - c. the rolling, 12-month summation of the operating hours; and
  - d. the rolling, 12-month summation of tons of production.



- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across baghouse #1 has been established to be not less than 3 inches of water; the acceptable pressure drop across baghouse #4 has been established to be not less than 3 inches of water.
- (3) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a once per shift basis. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.



This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions of fugitive dust shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit;



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- ii. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range; and
  - iii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse.
- b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by Cleveland DAQ.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
  - c. each incident of deviation described in a. (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.



- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(4) above:
- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
- a. Emission Limitation:  
PE shall not exceed 17.82 tons per rolling, 12-months.  
  
Applicable Compliance Method:  
  
Compliance with this emission limit may be based on an emission factor of 2.83 lbs/hour of filterable particulate emissions which was established through stack testing of the source. These stack tests were performed on March 27, 2009 and September 16, 2009. The emission factor may be used to demonstrate compliance with the annual allowable emission rate by multiplying the 2.83 lbs/hr emission factor by actual hours of operation per rolling, 12-months and dividing by 2000 lbs/ton. The lb/hr emission factor shall be replaced with the most current stack test results if additional testing occurs.
  - b. Emission Limitation:  
  
Fugitive PM emissions shall not exceed 3.01 tons per rolling, 12-months  
  
Applicable Compliance Method:  
  
Compliance shall be shown by using an engineering emission factor of 0.43 lbs fugitive PM per ton of metal processed multiplied by the tons of metal processed per rolling 12-months and divided by 2000 lbs/ton.
  - c. Emission Limitation:  
  
Visible particulate emissions from the baghouse stacks shall not exceed 20% opacity as a six-minute average, except as specified by rule; and visible emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.



Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

Particulate emissions shall not exceed 7.83 lbs/hr

Applicable Compliance Method:

Compliance shall be determined using Methods 1 through 5 in accordance with 40 CFR, Part 60, Appendix A. Emissions units P005 and P006 are vented to Wheelabratorbaghouse #1; therefore, compliance shall be determined based on the stack test results for this baghouse using the gr/dscf multiplied by the corresponding dscf air flow contribution to the baghouse from each emissions unit to determine the lb/hr emission rate. Alternatively, compliance may be determined by summing the allowable emission limits for all of the emissions units that are operating during the stack test and compare to the total lb/hr stack test result(s).

(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 within 12 months prior to permit expiration.
- b. The emission testing shall be conducted on baghouses #1 and #4 to demonstrate compliance with the allowable mass emission rate(s) for particulates, opacity, and lead emissions in the appropriate averaging period(s). The testing of baghouse #1 does not have to be simultaneous with the testing for baghouse #4. When testing an individual baghouse, all vented emissions units must operate during the test unless a vented source doesn't operate at the same time such as the casting line and/or ladle carriage side draft hood. Arrangements shall be made with the Cleveland Division of Air Quality (Cleveland DAQ) prior to the testing event and identified in the "Intent to Test" notification.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Particulates: Methods 1-5, 40 CFR Part 60, Appendix A

Opacity: Method 9, 40 CFR Part 60, Appendix A

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



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

g) **Miscellaneous Requirements**

- (1) This emissions unit was installed in 1972.



**5. P008, Rotary Melting Furnace No. 7**

**Operations, Property and/or Equipment Description:**

Rotary Melting Furnace No. 7 controlled by Wheelabratorbaghouse No. 4 and AAF baghouse No. 3, for melting raw material for recycling and reformation into ingots as brass or bronze.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., c)(1), d)(1), e)(1), f)(1)a., f)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	BAT is equivalent to 3745-17-11(A) and 3745-31-05(D)(1)(b).
b.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V	Particulate emissions (PE) from the baghouse stack(s) serving this emissions unit shall not exceed 16.9 tons per rolling, 12-months.  Fugitive particulate matter shall not exceed 3.23 tons per rolling, 12-months.  See b)(2)a. and c)(1) below.
c.	OAC rule 3745-17-07(A)(1)	The requirements of this rule are less stringent than the requirements established pursuant to 40 CFR Part 60 Subpart M.



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a three-minute average.
e.	OAC rule 3745-17-08(B)	The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust.  See b)(2)b. below.
f.	OAC rule 3745-17-11(A)	Particulate emissions shall not exceed 7.3 lbs/hr
g.	40 CFR Part 60, Subpart M  [In accordance with 40 CFR 60.130 this emission unit is an rotary furnace at a Secondary Brass and Bronze production plant subject to the emissions limitations/control measures specified in this section.]	Visible particulate emissions from the stack associated with this emissions unit shall not exceed 10% opacity, as a 6-minute average.  Particulate matter shall not exceed 0.022 grains per dry standard cubic feet (gr/dscf).  See section B.2. above.

(2) Additional Terms and Conditions

- a. For the purpose of this restriction, all particulate emissions are assumed to be equivalent to or greater than PM<sub>2.5</sub> and PM<sub>10</sub> emissions. As better test methods are developed to speciate PM<sub>2.5</sub>, these numbers may change.
- b. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirement:
  - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

c) Operational Restrictions

- (1) The maximum annual operating hours for this emissions unit shall not exceed 7,488 hours, based upon a rolling, 12-month summation of the operating hours.
- (2) Slag skimmings shall be air cooled indoors adequately before being placed outdoors.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the operating hours for each month;
  - b. the tons of production for each month;
  - c. the rolling, 12-month summation of the operating hours; and
  - d. the rolling, 12-month summation of tons of production.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across 0baghouse #3 has been established to be not less than 2inches of water; the acceptable pressure drop across baghouse #4 been established to be not less than 3inches of water.
- (3) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a once per shift basis. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;



- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions of fugitive dust shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.



e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit;
  - ii. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range; and
  - iii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by Cleveland DAQ.

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):

- a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;



- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
  - c. each incident of deviation described in a. (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in d)(4) above:
- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
- a. Emission Limitation:  
PE shall not exceed 16.9 tons per rolling, 12-months.  
  
Applicable Compliance Method:  
  
Compliance with this emission limit may be based on an emission factor of 2.34 lbs/hour of filterable particulate emissions which was established through stack testing of the source. These stack tests were performed on May 11, 2005 and September 16, 2009. The emission factor may be used to demonstrate compliance with the annual allowable emission rate by multiplying the 2.34 lbs/hr emission factor by actual hours of operation per rolling, 12-months and dividing by 2000 lbs/ton. The lb/hr emission factor shall be replaced with the most current stack test results if additional testing occurs.
  - b. Emission Limitation:  
  
Fugitive PM emissions shall not exceed 3.23 tons per rolling, 12-months



Applicable Compliance Method:

Compliance shall be shown by using an engineering emission factor of 0.43 lbs fugitive PM per ton of metal processed multiplied by the tons of metal processed per rolling 12-months and divided by 2000 lbs/ton.

c. Emission Limitation:

Visible particulate emissions from the baghouse stacks shall not exceed 10% opacity as a six-minute average; and visible emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

Particulate emissions shall not exceed 7.3 lbs/hr

Applicable Compliance Method:

Compliance shall be determined using Methods 1 through 5 in accordance with 40 CFR, Part 60, Appendix A. Emissions units P004 and P008 are vented to Wheelabratorbaghouse #4; therefore, compliance shall be determined based on the stack test results for this baghouse using the gr/dscf multiplied by the corresponding dscf air flow contribution to the baghouse from each emissions unit to determine the lb/hr emission rate. Alternatively, compliance may be determined by summing the allowable emission limits for all of the emissions units that are operating during the stack test and compare to the total lb/hr stack test result(s).

e. Emission Limitation:

Particulate matter emissions shall not exceed 0.022 gr/dscf

Applicable Compliance Method:

Compliance shall be determined using Methods 1 through 5 in accordance with 40 CFR, Part 60, Appendix A.

- (2) The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR Part 60, Subpart M, including the following sections:

60.133(b)	performance testing requirements in addition to 60.8
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Emissions testing showing compliance with 40 CFR Part 60, Subpart M was conducted on May 11, 2005 and September 16, 2009.



- (3) 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 within 12 months prior to permit expiration.
  - b. The emission testing shall be conducted on baghouses #4 and #3 to demonstrate compliance with the allowable mass emission rate(s) for particulates, opacity, and lead emissions in the appropriate averaging period(s). The testing for baghouse #4 does not have to be simultaneous with the testing for baghouse #3. When testing an individual baghouse, all vented emissions units must operate during the test unless a vented source doesn't operate at the same time such as the casting line and/or ladle carriage side draft hood. Arrangements shall be made with the Cleveland Division of Air Quality (Cleveland DAQ) prior to the testing event and identified in the "Intent to Test" notification.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):  
  
Particulates: Methods 1-5, 40 CFR Part 60, Appendix A  
  
Opacity: Method 9, 40 CFR Part 60, Appendix A  
  
Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.
  - 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 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).
  - f. 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 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.



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g) Miscellaneous Requirements

(1) This emissions unit was installed in 1981.



**6. P009, Induction Furnace #1**

**Operations, Property and/or Equipment Description:**

Electric Induction Furnace No. 1 controlled by AAF baghouse No. 2, for melting raw material for recycling and reformation into ingots as brass or bronze

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c., c)(2), d)(3), e)(1) and f)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions shall not exceed 1.43 lb/hour and 4.0 tons per year. See b)(2)a. and b)(2)c. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b. below.
c.	OAC rule 3745-31-05(D)(1)(b) Synthetic Minor to avoid Title V	Particulate emissions shall not exceed 4.0 tons per rolling 12-month period. See c)(2) and b)(2)c. below.



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)(1)	The visible particulate emission limit specified by this rule is less stringent than the visible particulate emission limit established pursuant to 40 CFR Part 60, Subpart M.
e.	OAC rule 3745-17-11(A)	Particulate emissions shall not exceed 3.38 lbs/hr  See b)(2)c. and b)(2)d. below.
f.	40 CFR Part 60, Subpart M  [In accordance with 40 CFR 60.130 this emission unit is an Electric Inductionfurnace at a Secondary Brass and Bronze production plant subject to the emissions limitations/control measures specified in this section.]	Visible particulate emissions from the stack associated with this emissions unit shall not exceed 10% opacity, as a six-minute average.  Particulate matter shall not exceed 0.022 grains per dry standard cubic feet (gr/dscf).  See section B.2. above.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emissions limits/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the controlled potential to emit for particulate emissions is less than 10 tons/year.



- c. For the purpose of this restriction, all particulate emissions are assumed to be equivalent to or greater than  $PM_{2.5}$  and  $PM_{10}$  emissions.
- d. The particulate limits associated with OAC rule 3745-17-11(A) shall become effective upon the approval of the SIP and when the limits from OAC rule 3745-31-05(A)(3) no longer apply.

c) Operational Restrictions

- (1) The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation.
- (2) The maximum annual operating hours for this emissions unit shall not exceed 5,594 hours, based upon a rolling, 12-month summation of the operating hours.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the baghouse #2 has been established to be not less than 3 inches of water.
- (2) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

Whenever the monitored value for the pressure drop deviates from the limit or range specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:



- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(3) The permittee shall maintain monthly records of the following information:

- a. the operating hours for each month; and
- b. the rolling, 12-month summation of the operating hours.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit;
  - ii. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range; and
  - iii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse.



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- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the Cleveland DAQ.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
  - c. each incident of deviation described in a. (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):



a. Emission Limitation:

1.43 lb/hour of particulate emissions

Applicable Compliance Method(s):

Compliance with the 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 40 CFR Part 60.133. The results of the emissions test shall be reported in terms of pounds perhour. Emissions units P009 and P010 are both vented to AAF baghouse #2; therefore, compliance shall be determined based on the stack test results for this baghouse using the gr/dscf multiplied by the corresponding dscf air flow contribution to the baghouse from each emissions unit to determine the lb/hr emission rate. Alternatively, compliance may be determined by summing the allowable emission limits for all of the emissions units that are operating during the stack test and compare to the total lb/hr stack test result(s).

b. Emission Limitation:

4.0 TPY of particulate emissions based upon a rolling, 12-month summation

Applicable Compliance Method(s):

Compliance with this emission limit may be based on an emission factor of 0.21 lb/hour of filterable particulate emissions which was established through stack testing of the source. These stack tests were performed on May 6, 2014. The emission factor may be used to demonstrate compliance with the annual allowable emission rate by multiplying the 0.21 lb/hr emission factor by actual hours of operation per rolling, 12-months and dividing by 2000 lbs/ton. The lb/hr emission factor shall be replaced with the most current stack test results if additional testing occurs.

c. Emission Limitation:

Particulate emissions shall not exceed 3.38 lbs/hr (this limit applies after the SIP is approved and the BAT emission limit no longer applies)

Applicable Compliance Method(s):

Compliance shall be determined using Methods 1 through 5 in accordance with 40 CFR, Part 60, Appendix A.

d. Emission Limitation:

10% opacity, as a 6-minute average



Applicable Compliance Method(s):

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using methods and procedures specified in U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A.

e. Emission Limitation:

Particulate matter emissions shall not exceed 0.022 gr/dscf

Applicable Compliance Method:

Compliance shall be determined using Methods 1 through 5 in accordance with 40 CFR, Part 60, Appendix A.

- (2) The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR Part 60, Subpart M, including the following sections:

60.133(b)	Performance testing requirements in addition to 60.8.
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Emissions testing showing compliance with 40 CFR Part 60, Subpart M was conducted on March 27, 2009.

Emissions testing showing compliance with 40 CFR Part 63, Subpart TTTTTT was conducted on May 3, 2014.

- (3) 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 within 12 months prior to permit expiration.
- b. The emission testing shall be conducted on baghouse #2 to demonstrate compliance with the allowable mass emission rate(s) for particulate and visible emissions, in the appropriate averaging period(s).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Particulate: Methods 1-4 and 5 of 40 CFR Part 60, Appendix A; and

Visible emissions: Method 9 of 40 CFR Part 60, Appendix A.

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

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



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- 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 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).
  - f. 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.
  - g. 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 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.
- g) Miscellaneous Requirements
- (1) None.



7. P010, Induction Furnace #2

Operations, Property and/or Equipment Description:

Electric Induction Furnace No. 2, controlled by AAF baghouse No. 2, for melting raw material for recycling and reformation into ingots as brass or bronze.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c., c)(2), d)(3), e)(1) and f)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions shall not exceed 1.43 lb/hour and 4.0 tons per year. See b)(2)a. and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(D)(1)(b) Synthetic Minor to avoid Title V	Particulate emissions shall not exceed 4.0 tons per rolling 12-month period. See c)(2) and b)(2)c.



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)(1)	The visible particulate emission limit specified by this rule is less stringent than the visible particulate emission limit established pursuant to 40 CFR Part 60, Subpart M.
e.	OAC rule 3745-17-11(A)	Particulate emissions shall not exceed 3.38 lbs/hr  See b)(2)c. and b)(2)d.
f.	40 CFR Part 60, Subpart M  [In accordance with 40 CFR 60.130 this emission unit is an Electric Inductionfurnace at a Secondary Brass and Bronze production plant subject to the emissions limitations/control measures specified in this section.]	Visible particulate emissions from the stack associated with this emissions unit shall not exceed 10% opacity, as a six-minute average.  Particulate matter shall not exceed 0.022 grains per dry standard cubic feet (gr/dscf).  See section B.2. above.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emissions limits/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the controlled potential to emit for particulate emissions is less than 10 tons/year.



- c. For the purpose of this restriction, all particulate emissions are assumed to be equivalent to or greater than PM<sub>2.5</sub> and PM<sub>10</sub> emissions.
- d. The particulate limits associated with OAC rule 3745-17-11(A) shall become effective upon the approval of the SIP and when the limits from OAC rule 3745-31-05(A)(3) no longer apply.

c) Operational Restrictions

- (1) The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation.
- (2) The maximum annual operating hours for this emissions unit shall not exceed 5,594 hours, based upon a rolling, 12-month summation of the operating hours.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the baghouse #2 has been established to be not less than 3 inches of water.
- (2) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

Whenever the monitored value for the pressure drop deviates from the limit or range specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:



- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(3) The permittee shall maintain monthly records of the following information:

- a. the operating hours for each month; and
- b. the rolling, 12-month summation of the operating hours.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit;
  - ii. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range; and
  - iii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse.



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- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the Cleveland DAQ.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
  - c. each incident of deviation described in a. (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):



a. Emission Limitation:

1.43 lb/hour of particulate emissions

Applicable Compliance Method(s):

Compliance with the 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 40 CFR Part 60.133. The results of the emissions test shall be reported in terms of pounds perhour. Emissions units P009 and P010 are both vented to AAF baghouse #2; therefore, compliance shall be determined based on the stack test results for this baghouse using the  $gr/dscf$  multiplied by the corresponding  $dscf$  air flow contribution to the baghouse from each emissions unit to determine the lb/hr emission rate. Alternatively, compliance may be determined by summing the allowable emission limits for all of the emissions units that are operating during the stack test and compare to the total lb/hr stack test result(s).

b. Emission Limitation:

4.0 TPY of particulate emissions based upon a rolling, 12-month summation

Applicable Compliance Method(s):

Compliance with this emission limit may be based on an emission factor of 0.21 lb/hour of filterable particulate emissions which was established through stack testing of the source. These stack tests were performed on May 6, 2014. The emission factor may be used to demonstrate compliance with the annual allowable emission rate by multiplying the 0.21 lb/hr emission factor by actual hours of operation per rolling, 12-months and dividing by 2000 lbs/ton. The lb/hr emission factor shall be replaced with the most current stack test results if additional testing occurs.

c. Emission Limitation:

Particulate emissions shall not exceed 3.38 lbs/hr (this limit applies after the SIP is approved and the BAT emission limit no longer applies)

Applicable Compliance Method(s):

Compliance shall be determined using Methods 1 through 5 in accordance with 40 CFR, Part 60, Appendix A.

d. Emission Limitation:

10% opacity, as a 6-minute average



Applicable Compliance Method(s):

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using methods and procedures specified in U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A.

e. Emission Limitation:

Particulate matter emissions shall not exceed 0.022 gr/dscf

Applicable Compliance Method:

Compliance shall be determined using Methods 1 through 5 in accordance with 40 CFR, Part 60, Appendix A.

- (2) The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR Part 60, Subpart M, including the following sections:

60.133(b)	Performance testing requirements in addition to 60.8.
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Emissions testing showing compliance with 40 CFR Part 60, Subpart M was conducted on March 27, 2009.

Emissions testing showing compliance with 40 CFR Part 63, Subpart TTTTTT was conducted on May 3, 2014.

- (3) 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 within 12 months prior to permit expiration.
- b. The emission testing shall be conducted on baghouse #2 to demonstrate compliance with the allowable mass emission rate(s) for particulate and visible emissions, in the appropriate averaging period(s).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Particulate: Methods 1-4 and 5 of 40 CFR Part 60, Appendix A; and

Visible emissions: Method 9 of 40 CFR Part 60, Appendix A.

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

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



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- 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 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).
  - f. 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.
  - g. 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 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.
- g) Miscellaneous Requirements
- (1) None.