



9/22/2014

Heather Rainwater
 McWane Poles
 2266 South Sixth St.
 Coshocton, OH 43812

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0616015010
 Permit Number: P0115154
 Permit Type: Initial Installation
 County: Coshocton

Certified Mail

Yes	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
 77 South High Street, 17th Floor
 Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)3858501 or the Office of Compliance Assistance and Pollution Prevention at (614)644-3469.

Sincerely,



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

Cc: U.S. EPA
Ohio EPA-SEDO; West Virginia



Response to Comments

Facility ID:	0616015010
Facility Name:	McWane Poles
Facility Description:	
Facility Address:	592 Clow Lane Coshocton, OH 43812 Coshocton County
Permit:	P0115154, Permit-To-Install - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Coshocton Tribune on 04/24/2014. The comment period ended on 05/24/2014.	
Hearing date (if held)	None.
Hearing Public Notice Date (if different from draft public notice)	N/A

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

Permit Strategy Write-up

1. Number 4
 - a. Limits for Total HAPs and Individual HAP should be 24.9 TPY and 9.9 TPY respectively
2. Number 7
 - a. Limits for Total HAPs and Individual HAP should be 24.9 TPY and 9.9 TPY respectively
 - b. Limit for PE = 14.21, PM10 = 9.60, PM2.5 = 9.46

These corrections are not needed because the permit strategy write-up is not issued with the permit.

Facility Wide Terms and Conditions

3. Section B.2.a)
 - a. Is it possible to not specify every unit that currently emits HAPs? I would like the flexibility to install or shutdown a HAP emitting unit without needing to administratively modify this permit.

Yes. It is possible to give a blanket synthetic minor for HAP emissions. Please note the list of emissions units not using organic HAP is still included. If this list is removed and Clow uses organic HAP in these emissions units, they would trigger a Chapter 31 modification of those units.
4. Section B.3.a)
 - a. Reference to PTI 06-07603 needs to be removed because the units under this PTI have



been shutdown.

This reference has been removed and a reference to Clow's pending administrative modification which will incorporate this synthetic minor was included.

- b. Numbers (2) through (4) need removed as these units are shutdown
These items have been removed.

5. Section B.3.b)

- a. Reference to PTI 06-07603 needs to be removed because the units under this PTI have been shutdown.

This reference has been removed and a reference to Clow's pending administrative modification which will incorporate this synthetic minor was included.

- b. Numbers (2), (3), and (5) need to be removed as these units are shutdown
These items have been removed.
- c. Again, if the facility has a facility wide limit on total HAPs and individual HAP emissions, is it necessary to limit specific units? Suggest removal of this section.
The "no HAP" emissions units need to be listed because if you begin using HAPs in them, Clow would trigger a Chapter 31 modification of them.

6. Section B.3.c)

- a. I believe we need to add the following from our Federally Enforceable Limits Request. I cannot answer why they were not included in the proposed language provided by Haley & Aldrich dated 11/20/13. It seems to me these limits are needed to avoid NESHAP as well.
 - i. 19.5 ton electrodes each for P906 and P907
 - ii. 180 ton grit (P908)

These items have been added and the EUs have been updated to P907, P908, and P909 respectively. See comment #14.

7. Section B.3.c) (3) and (4)

- a. I request to monitor hours at each unit of operation. Each emissions unit will run independently and the baghouse may operate even when emission units are not; therefore recording baghouse hours will not be representative. Suggest "6,000 hours of operation for emissions units (P901-P903 and P905-P906)"

The reason for the operating hours of the baghouse vs. emissions unit is because if one EU operates 6,000 hours alone the limit is fulfilled. Then, if the other emissions unit(s) operates the other 2,760 hours in the year, the limit is exceeded. If Clow would like to recommend language to resolve this issue, Ohio EPA would be happy to review the language and, if accepted, change the permit terms and conditions.

8. Section B.4.a)

- a. Reference to PTI 06-07603 needs to be removed because the units under this PTI have been shutdown.

This reference has been removed and a reference to Clow's pending administrative modification which will incorporate this synthetic minor was included.

- b. Remove numbers (2)-(4), (8)-(10)
These items have been removed.

9. Section B.4.b)

- a. Reference to PTI 06-07603 needs to be removed because the units under this PTI have been shutdown.



This reference has been removed and a reference to Clow's pending administrative modification which will incorporate this synthetic minor was included.

- b. K001, K007, K008, and K013 need to be removed as these units are shutdown

These items have been removed.

- c. Suggest removal of this section to follow suit with Section B.3.b).

These items have been removed.

10. Section B.4.b)(1)

- a. Suggest removal of the following language "in any of the above-listed emissions units". This will allow for recordkeeping of any unit that emits organic HAPs.

This language has been removed.

11. Section B.4.b)(2)

- a. Suggest removal of the following language "in any of the above-listed emissions units". This will allow for recordkeeping of any unit that emits no organic HAPs.

This language has been removed.

12. Section B.4.c)(7) through (12)

- a. Combine numbers 7-9 with numbers 10-12; Replace "Cartridge Filter A" and "Cartridge Filter C" with (P901-P903 and P905-P906)

See comment above for 7.a. These have been combined using Cartridge Filter A and C.

The EUs have been updated to P902-P904 and P906-P907 respectively (see comment 14).

13. Section B.4.c)

- a. Add requirements for recordkeeping of electrode throughput (P907-P908)

This language has been added.

- b. Add requirements for recordkeeping of grit throughput (P908)

This language has been added.

14. Section B.4.d)

- a. Is it possible to take into consideration Clow Water's current emission unit identification numbers? Recordkeeping would be cleaner if I did not have identical emission unit ID numbers under the same ownership. Example: Clow Water, Cupola (P901) and McWane Poles, Plasma Spigot Cut (P901)

Yes, see revised terms and conditions. F001 is now F071, K001 is now K022, R001 is now R008, P901 is now P902, P902 is now P903, etc.

K022(K001), Touch up Coating

15. Section C.1.d)(1)a.

- a. I do not understand what is meant by an identification number and type. Does type mean coating, thinner, etc.?

Yes. For example, OAC rule 3745-21-09(U) regulates zinc rich primers and other coatings.

You could record something like Sherwin Williams primer ABC123 (as found on MSDS) and state that it is a zinc rich primer. The "type" requirement has been removed and the "identification number" has been retained.

16. Section C.1.d)(2)a.

- a. I do not understand what is meant by an identification number.

Some companies have identification numbers for the coatings they use. See revised terms and conditions.



P902(P901), Plasma Spigot Cut

17. Section C.2.b)(2)e.

- a. Remove 90% capture efficiency. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.

The capture efficiency of 90% is required to avoid PSD in accordance with OAC rule 3745-31-03(NNN)(4)(s). This rule summarized says that for a secondary metal production plants we must count fugitives when evaluating if thresholds are met or exceeded.

18. Section C.2.b)(3)

- a. Facility requested to record hours of operation for the emission unit, not the baghouse.

See comment above for 7.a.

19. Section C.2.d)(2)a. through c.

- a. Facility requested to record hours of operation for the emission unit, not the baghouse.

See comment above for 7.a.

20. Section C.2.d)(3)a.

- a. Fugitive PM_{2.5} emissions factor from the EPA PM Calculator SCC 30903088 is 0.011 not 0.037.
- b. Either correct to (100% - capture efficiency (90%)) or state (1-capture efficiency (0.9)). 0.9% as currently written equals 0.009 for PE, PM₁₀, and PM_{2.5}.

These items have been corrected.

21. Section C.2.d)(4)a.

- a. Replace actual operating hours for Cartridge Filter A with actual operating hours for P901-P903. McWane Poles will use the most conservative operating hours of the three emissions units in its calculation to demonstrate compliance with stack emission limits.

See comment above for 7.a.

22. Section C.2.e)(1)c. and d.

- a. Replace Cartridge Filter A with P901-P903

See comment above for 7.a.

23. Section C.2.f)(1)a.

- a. Remove capture efficiency of 90%. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.

See comment for 17.a.

24. Section C.2.f)(2)b., d. and e.

- a. Remove requirement for demonstrating compliance with capture and control efficiencies. PE testing (Section C.2.f)(2)c.) is sufficient to avoid PSD.

McWane Poles is considered one facility with Clow Water Systems which is a secondary metal production facility. In OAC rule 3745-31-01(NNN)(4) states that "fugitive emissions of a stationary source to the extent quantifiable shall not be included in determining for any of the purposes of this rule whether it is a major stationary source, unless the stationary source belongs to one of the following categories of stationary sources". In OAC rule 3745-31-01(NNN)(4)(s), it lists secondary metal production facilities. Therefore, fugitive emissions have to be accounted for PSD.

- b. Capture efficiency determinations using Methods 204 through 204F are typically used for demonstrating capture of volatile organic compounds ducted to a control device; therefore, please remove capture efficiency demonstration requirement for PE, PM₁₀ and PM_{2.5} from



Plasma Spigot Cut operations.

This method has been update to perform Method 22 visible emissions readings from all egress points of the building to show proper capture efficiency pursuant to the voluntary restriction McWane Poles is taking to demonstrate ongoing compliance with the capture efficiency.

P903 (P902), Plasma Bell Cut

25. Section C.3.b)(2)e.

- a. Remove 90% capture efficiency. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.

See comment for 17.a.

26. Section C.3.b)(3)

- a. Facility requested to record hours of operation for the emission unit, not the baghouse.

See comment above for 7.a.

27. Section C.3.d)(2)a. through c.

- a. Facility requested to record hours of operation for the emission unit, not the baghouse.

See comment above for 7.a.

28. Section C.3.d)(3)a.

- a. Fugitive PM_{2.5} emissions factor from the EPA PM Calculator SCC 30903088 is 0.011 not 0.037.
- b. Either correct to (100% - capture efficiency (90%)) or state (1-capture efficiency (0.9)). 0.9% as currently written equals 0.009 for PE, PM₁₀, and PM_{2.5}.

These items have been corrected.

29. Section C.3.d)(4)a.

- a. Replace Cartridge Filter A with P901-P903. McWane Poles will use the most conservative operating hours of the three emissions units in its calculation to demonstrate compliance with stack emission limits.

See comment above for 7.a.

30. Section C.3.e)(1)c. and d.

- a. Replace Cartridge Filter A with P901-P903

See comment above for 7.a.

31. Section C.3.f)(1)a.

- a. Remove capture efficiency of 90%. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.

See comment for 17.a.

32. Section C.3.f)(2)b., d. and e.

- a. Remove requirement for demonstrating compliance with capture and control efficiencies. PE testing (Section C.3.f)(2)c.) is sufficient to avoid PSD.

See comment in 24.a. above.

- b. Capture efficiency determinations using Methods 204 through 204F are typically used for demonstrating capture of volatile organic compounds ducted to a control device; therefore, please remove capture efficiency demonstration requirement for PE, PM₁₀ and PM_{2.5} from Plasma Bell Cut operations.

See comment in 24.b. above.



P904(P903), Deburr Grind

33. Section C.4.b)(2)b.i.
 - a. Remove. Capture and control efficiencies were not requested as voluntary restrictions.
See comment in 24.a. above.
34. Section C.4.b)(2)e.
 - a. Remove 90% capture efficiency. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.
See comment for 17.a.
35. Section C.4.b)(3)
 - a. Facility requested to record hours of operation for the emission unit, not the baghouse.
See comment above for 7.a.
36. Section C.4.d)(2)a. through c.
 - a. Facility requested to record hours of operation for the emission unit, not the baghouse.
See comment above for 7.a.
37. Section C.4.d)(3)a.
 - a. Either correct to (100% - capture efficiency (90%)) or state (1-capture efficiency (0.9)). 0.9% as currently written equals 0.009 for PE, PM₁₀, and PM_{2.5}.
This has been corrected.
38. Section C.4.d)(4)a.
 - a. Replace Cartridge Filter A with P901-P903. McWane Poles will use the most conservative operating hours of the three emissions units in its calculation to demonstrate compliance with stack emission limits.
See comment above for 7.a.
39. Section C.4.e)(1)c. and d.
 - a. Replace Cartridge Filter A with P901-P903
See comment above for 7.a.
40. Section C.4.f)(1)a.
 - a. Remove capture efficiency of 90%. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.
See comment for 17.a.
41. Section C.4.f)(2)b., d. and e.
 - a. Remove requirement for demonstrating compliance with capture and control efficiencies. PE testing (Section C.4.f)(2)c.) is sufficient to avoid PSD.
See comment in 24.a. above.
 - b. Capture efficiency determinations using Methods 204 through 204F are typically used for demonstrating capture of volatile organic compounds ducted to a control device; therefore, please remove capture efficiency demonstration requirement for PE, PM₁₀ and PM_{2.5} from Deburr Grind operations.
See comment in 24.b. above.

P905(P904), ID Grind

42. Section C.5.b)(2)b.i.
 - a. Remove. Capture and control efficiencies were not requested as voluntary restrictions.
See comment in 24.a. above.



43. Section C.5.b)(2)e.
a. Remove 90% capture efficiency. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.
See comment for 17.a.
44. Section C.5.d)(2)a.
a. Facility requested to record hours of operation for the emission unit, not the baghouse.
See comment above for 7.a.
45. Section C.5.d)(3)a.
a. Either correct to (100% - capture efficiency (90%)) or state (1-capture efficiency (0.9)). 0.9% as currently written equals 0.009 for PE, PM₁₀, and PM_{2.5}.
This has been corrected.
46. Section C.5.d)(4)a.
a. Replace Cartridge Filter B with P904.
See comment above for 7.a.
47. Section C.5.f)(1)a.
a. Remove capture efficiency of 90%. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.
See comment for 17.a.
48. Section C.5.f)(2)b., d. and e.
a. Remove requirement for demonstrating compliance with capture and control efficiencies. PE testing (Section C.5.f)(2)c.) is sufficient to avoid PSD.
See comment in 24.a. above.
b. Capture efficiency determinations using Methods 204 through 204F are typically used for demonstrating capture of volatile organic compounds ducted to a control device; therefore, please remove capture efficiency demonstration requirement for PE, PM₁₀ and PM_{2.5} from ID Grind operations.
See comment in 24.b. above.

P906(P905), Plasma Length Cut

49. Section C.6.b)(2)e.
a. Remove 90% capture efficiency. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.
See comment for 17.a.
50. Section C.6.b)(3)
a. Facility requested to record hours of operation for the emission unit, not the baghouse.
See comment above for 7.a.
51. Section C.6.d)(2)a. through c.
a. Facility requested to record hours of operation for the emission unit, not the baghouse.
See comment above for 7.a.
52. Section C.6.d)(3)
a. Fugitive PM_{2.5} emissions factor from the EPA PM Calculator SCC 30903088 is 0.011 not 0.037.
b. Either correct to (100% - capture efficiency (90%)) or state (1-capture efficiency (0.9)). 0.9% as currently written equals 0.009 for PE, PM₁₀, and PM_{2.5}.
These items have been corrected.



53. Section C.6.d)(4)a.
a. Replace Cartridge Filter C with P905-P906.
See comment above for 7.a.
54. Section C.6.e)(1)c. and d.
b. Replace Cartridge Filter C with P905-P906
See comment above for 7.a.
55. Section C.6.f)(1)a.
a. Remove capture efficiency of 90%. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.
See comment for 17.a.
56. Section C.6.f)(2)b., d. and e.
a. Remove requirement for demonstrating compliance with capture and control efficiencies. PE testing (Section C.6.f)(2)c.) is sufficient to avoid PSD.
See comment in 24.a. above.
b. Capture efficiency determinations using Methods 204 through 204F are typically used for demonstrating capture of volatile organic compounds ducted to a control device; therefore, please remove capture efficiency demonstration requirement for PE, PM₁₀ and PM_{2.5} from Plasma Length Cut operations.
See comment in 24.b. above.

P907(P906), Base Plate Weld

57. Section C.7.b)(2)e.
a. Remove 90% capture efficiency. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.
See comment for 17.a.
58. Section C.7.b)(3)
a. Facility requested to record hours of operation for the emission unit, not the baghouse.
See comment above for 7.a.
59. Section C.7.d)(2)a. through c.
a. Facility requested to record hours of operation for the emission unit, not the baghouse.
See comment above for 7.a.
60. Section C.7.d)(3)
a. Either correct to (100% - capture efficiency (90%)) or state (1-capture efficiency (0.9)). 0.9% as currently written equals 0.009 for PE, PM₁₀, and PM_{2.5}.
This has been corrected.
61. Section C.7.d)(4)a.
a. Replace Cartridge Filter C with P905-P906.
See comment above for 7.a.
62. Section C.7.e)(1)c. and d.
c. Replace Cartridge Filter C with P905-P906
See comment above for 7.a.
63. Section C.7.f)(1)a.
a. Remove capture efficiency of 90%. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.
See comment for 17.a.



64. Section C.7.f)(2)b., d. and e.

- a. Remove requirement for demonstrating compliance with capture and control efficiencies. PE testing (Section C.7.f)(2)c.) is sufficient to avoid PSD.

See comment in 24.a. above.

- b. Capture efficiency determinations using Methods 204 through 204F are typically used for demonstrating capture of volatile organic compounds ducted to a control device; therefore, please remove capture efficiency demonstration requirement for PE, PM₁₀ and PM_{2.5} from Base Plate Weld operations.

See comment in 24.b. above.

P908(P907), Cap Weld

65. Section C.8.b)(2)e.

- a. Remove 90% capture efficiency. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.

See comment for 17.a.

66. Section C.8.d)(2)a.

- a. Facility requested to record hours of operation for the emission unit, not the baghouse.

See comment above for 7.a.

67. Section C.8.d)(3)a

- a. Either correct to (100% - capture efficiency (90%)) or state (1-capture efficiency (0.9)). 0.9% as currently written equals 0.009.

This has been corrected.

68. Section C.8.d)(4)a.

- a. Replace Cartridge Filter D with P907.

See comment above for 7.a.

69. Section C.8.f)(1)a.

- a. Remove capture efficiency of 90%. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.

See comment for 17.a.

70. Section C.8.f)(2)b., d. and e.

- a. Remove requirement for demonstrating compliance with capture and control efficiencies. PE testing (Section C.8.f)(2)c.) is sufficient to avoid PSD.

See comment in 24.a. above.

- b. Capture efficiency determinations using Methods 204 through 204F are typically used for demonstrating capture of volatile organic compounds ducted to a control device; therefore, please remove capture efficiency demonstration requirement for PE, PM₁₀ and PM_{2.5} from Cap Weld operations.

See comment in 24.b. above.

P909(P908), Grit Wheel Blast

71. Section C.9.b)(1)c.

- a. Fugitive PE should be 0.009 TPY
- b. Fugitive PM₁₀ should be 0.005 TPY
- c. Fugitive PM_{2.5} should be 0.001 TPY

These items have been corrected.



72. Section C.9.b)(2)e.
a. Remove 90% capture efficiency. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.
See comment for 17.a.
73. Section C.9.d)(2)a.
a. Facility requested to record hours of operation for the emission unit, not the baghouse.
See comment above for 7.a.
74. Section C.9.d)(3)a
a. Either correct to (100% - capture efficiency (99.5%)) or state (1-capture efficiency (0.995)). 0.995% as currently written equals 0.00995.
This has been corrected.
75. Section C.9.d)(4)a.
a. Replace Baghouse E with P908.
See comment above for 7.a.
76. Section C.9.f)(1)a.
a. Remove capture efficiency of 99.5%. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.
See comment for 17.a.
77. Section C.9.f)(1)b.
a. Fugitive PE should be 0.009 TPY
This has been corrected.
78. Section C.9.f)(1)c.
a. Fugitive PM₁₀ should be 0.005 TPY
This has been corrected.
79. Section C.9.f)(1)d.
a. Fugitive PM_{2.5} should be 0.001 TPY
This has been corrected.
80. Section C.9.f)(2)b., d. and e.
a. Remove requirement for demonstrating compliance with capture and control efficiencies. PE testing (Section C.9.f)(2)c.) is sufficient to avoid PSD.
See comment in 24.a. above.
b. Capture efficiency determinations using Methods 204 through 204F are typically used for demonstrating capture of volatile organic compounds ducted to a control device; therefore, please remove capture efficiency demonstration requirement for PE, PM₁₀ and PM_{2.5} from Grit Wheel Blast operations.
See comment in 24.b. above.

P910(P909), Zinc Arc Spray

81. Section C.10.b)(1)c.
a. Does the fugitive limit include both wire melt and spray (1.95+0.002)?
Yes. Rounding set it at 1.95.
82. Section C.10.b)(1)e.
a. Stack emissions = 0.51 lb/hr from wire spray plus 0 lb/hr from wire melt
This emissions limitation is a rule based limit and is not equivalent to BAT.



83. Section C.10.b)(2)b.i.
a. Remove. Capture and control efficiencies were not requested as voluntary restrictions.
This limit was developed to avoid BAT and is required for the synthetic minor.
84. Section C.10.b)(2)b.ii.
a. Perhaps a rounding issue. I have 4.21 TPY.
This has been corrected.
85. Section C.10.b)(2)e.
a. Remove 99.5% capture efficiency. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.
See comment for 17.a.
86. Section C.10.d)(2)a.
a. Facility requested to record hours of operation for the emission unit, not the baghouse.
See comment above for 7.a.
87. Section C.10.d)(3)a
a. It appears this does not include wire melt and wire spray and is a mix of the two using the wire melt emission factor with the spray equation and the wrong capture efficiency. It also does not take into account control efficiency. I believe it should be:
i. Fugitive Emissions (tons) = ((actual throughput of zinc wire (as recorded (d)(1)a.))* (0.005 (lb PE/PM10/PM2.5/ton of poles)) / (2000 lb/ton)) + ((actual throughput of zinc wire (as recorded (d)(1)a.))* (2000 (lb PE/PM10/PM2.5/ton)) * (1-Transfer Efficiency(0.6)) x (1-Capture Efficiency(0.995) / (2000 lb/ton)))
This has been corrected to the above equation.
88. Section C.10.d)(4)a.
a. Replace Filter F with P909.
See comment above for 7.a.
89. Section C.10.f)(1)a.
a. Remove capture efficiency of 99.5%. This was not requested as part of the facility's federally enforceable limit request. Outlet loading is sufficient to ensure avoidance of PSD.
See comment for 17.a.
90. Section C.10.f)(1)b.
a. Does the fugitive limit include both wire melt and spray (1.95+0.002) tons?
Yes. Rounding makes this 1.95 tons.
91. Section C.10.f)(1)d.
a. Stack emissions = 0.51 lb/hr from wire spray, 0 lb/hr from wire melt
See comment in 82.a. above.
92. Section C.10.f)(2)b., d. and e.
a. Remove requirement for demonstrating compliance with capture and control efficiencies. PE testing (Section C.10.f)(2)c.) is sufficient to avoid PSD.
See comment in 24.a. above.
b. Capture efficiency determinations using Methods 204 through 204F are typically used for demonstrating capture of volatile organic compounds ducted to a control device; therefore, please remove capture efficiency demonstration requirement for PE, PM₁₀ and PM_{2.5} from Zinc Arc Spray operations.



See comment in 24.b. above.

R008(R001), Topcoat Application

93. Section C.11.b)(1)b.

- a. Remove 100% capture efficiency. This was not requested as part of the facility's federally enforceable limit request.

See comment for 17.a.

94. Section C.11.b)(1)e.

- a. PE/PM10/PM2.5 appears to be missing the drying oven portion ($0.05 + 0.21 = 0.26$ TPY)

This has been corrected

95. . Section C.11.b)(2)c.ii.

- a. Remove 100% capture efficiency. This was not requested as part of the facility's federally enforceable limit request.

See comment for 17.a.

96. Section C.11.b)(2)c.iii.

- a. PE/PM10/PM2.5 appears to be missing the drying oven portion ($0.05 + 0.21 = 0.26$ TPY)

This has been corrected.

97. Section C.11.c)(3) - (4)

- a. Top Coating operations are vented to a fabric filter, not a baghouse; remove references to baghouse

This has been corrected to dry particulate filter.

98. Section C.11.d)(1)a.

- a. I do not understand what is meant by an identification number and type. Does type mean coating, thinner, etc.?

See comment above for 15.a.

99. Section C.11.d)(2)

- a. I do not understand the need for this requirement. I cannot locate the Authority for term: OAC 3745-31-09(U). Recordkeeping on a monthly basis should suffice to demonstrate compliance with monthly emission limitations.

I cited the incorrect rule for authority. This recordkeeping is to show compliance with OAC rule 3745-21-09(U). In OAC rule 3745-21-09(B)(3) it explains what records need to be kept to show compliance, and in OAC rule 3745-21-10, it explains how to calculate the required records. The authority citation has been corrected.

100. Section C.11.d)(4) through (8)

- a. Remove. Requirements refer to a baghouse. Emission Unit R001 is not controlled by a baghouse.

This has been changed to dry particulate filter.

101. Section C.11.e)(2)

- a. Remove. Requirement refers to a baghouse. Emission Unit R001 is not controlled by a baghouse.

This has been changed to dry particulate filter.

102. Section C.11.f)(1)d.

- a. Remove capture efficiency of 100%. This was not requested as part of the facility's federally enforceable limit request.

See comment for 17.a.



103. Section C.11.f)(1)h.
 - a. PE/PM10/PM2.5 appears to be missing the drying oven portion ($0.05 + 0.21 = 0.26$ TPY)
This has been corrected.
104. Section C.11.f)(2)b., d. and e.
 - a. Remove requirement for demonstrating compliance with capture and control efficiencies. PE testing (Section C.11.f)(2)c.) is sufficient to avoid PSD.
See comment in 24.a. above.



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
McWane Poles**

Facility ID:	0616015010
Permit Number:	P0115154
Permit Type:	Initial Installation
Issued:	9/22/2014
Effective:	9/22/2014



Division of Air Pollution Control
Permit-to-Install
for
McWane Poles

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Final Permit-to-Install
McWane Poles
Permit Number: P0115154
Facility ID: 0616015010
Effective Date: 9/22/2014

Authorization

Facility ID: 0616015010
Facility Description:
Application Number(s): A0048315, A0049503
Permit Number: P0115154
Permit Description: Initial installation permit for a cast utility pole finishing company.
Permit Type: Initial Installation
Permit Fee: \$2,200.00
Issue Date: 9/22/2014
Effective Date: 9/22/2014

This document constitutes issuance to:

McWane Poles
592 Clow Lane
Coshocton, OH 43812

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

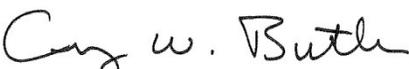
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0115154
Permit Description: Initial installation permit for a cast utility pole finishing company.

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

Emissions Unit ID:	K022
Company Equipment ID:	Touch Up
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P902
Company Equipment ID:	Plasma Spigot Cut
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P903
Company Equipment ID:	Plasma Bell Cut
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P904
Company Equipment ID:	Deburr Grind
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P905
Company Equipment ID:	ID Grind
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P906
Company Equipment ID:	Plasma Length Cut
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P907
Company Equipment ID:	Base Plate Weld
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P908
Company Equipment ID:	Cap Weld
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P909
Company Equipment ID:	Grit Wheel Blast
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P910
Company Equipment ID:	Zinc Arc Spray
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R008



Final Permit-to-Install
McWane Poles
Permit Number: P0115154
Facility ID: 0616015010
Effective Date: 9/22/2014

Company Equipment ID: Topcoat
Superseded Permit Number:
General Permit Category and Type: Not Applicable



Final Permit-to-Install
McWane Poles
Permit Number: P0115154
Facility ID: 0616015010
Effective Date: 9/22/2014

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



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

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

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

6. Compliance Requirements

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted



local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

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

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.



8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the



Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.



13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



Final Permit-to-Install
McWane Poles
Permit Number: P0115154
Facility ID: 0616015010
Effective Date: 9/22/2014

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. Facility-Wide Emission Limitations

a) McWane Poles (0616015010) and Clow Water Systems (0616010006) have been determined to be one facility for permitting purposes under 40 CFR Part 52.21, OAC Chapter 3745-31, and OAC Chapter 3745-77.

The facility-wide (McWane Poles (0616015010) and Clow Water Systems (0616010006) combined) individual HAP and the facility-wide total combined HAP emissions shall not exceed 9.9 and 24.9 tons per year, respectively, based upon a rolling, 12-month summation of the emission rates from all HAP emitting emissions units at the facility.

(Authority for term: OAC rule 3745-31-05(D))

3. Operational Restrictions

a) The following annual operational restrictions are in place in PTI P0116276 to maintain facility-wide HAPs compliance for Clow Water Systems (0616010006):

(1) 275,000 tons of total metal melted.

(Authority for term: OAC rule 3745-31-05(D))

b) In order to maintain compliance with the facility-wide emission limitations established in PTI P0116276, on HAPS, only materials that contain no organic HAP are to be used at the following Clow Water Systems (0616010006) emissions units:

(1) Pipe Paint Operations (K006);

(2) Leampe Core Wash (K009); and

(3) Pipe Painting Operation – Large Limen (K015)

c) In order to maintain compliance with the facility-wide emission limitations on HAPs, the facility, McWane Poles (0616015010), is limited to the following annual operational restrictions:

(1) 2,190 gallons of coating (K022);

(2) 27,000 tons of poles (P902-P906);

(3) 19.5 tons of electrode (P907);

(4) 19.5 tons of electrode (P908);

(5) 180 tons of grit (P909);

(6) 6,000 hours of operation for Cartridge Filter A, controlling emissions units P902-P904;



- (7) 6,000 hours of operation for Filter C, controlling emissions units P906 and P907;
- (8) 6,000 hours of operation and 54,000 million Btu of natural gas at drying oven (R008);
- (9) 108,000 gallons of coating and 250 gallons of cleanup material (R008).

(Authority for term: OAC rule 3745-31-05(D))

4. Facility-Wide Monitoring and/or Record Keeping Requirements

- a) As required by PTI P0116276, the following information must be maintained each month for Clow Water Systems (0616010006):

- (1) the quantity of metal melted, in tons;
- (2) the facility-wide individual HAP and facility-wide total combined HAP emissions, in tons;
- (3) the rolling, 12-month summation of the quantity of metal melted, in tons; and
- (4) the rolling, 12-month summation of the facility-wide individual HAP and facility-wide total combined HAP emissions, in tons.

(Authority for term: OAC rule 3745-31-05(D))

- b) As required by PTI P0116276, the following information shall be collected and recorded each month for each of the HAP emitting emissions units located at Clow Water Systems (0616010006):

- (1) For any month that a material containing organic HAP is used:
 - a. the company identification for each HAP-containing coating and cleanup material employed during the month;
 - b. the number of gallons of each HAP-containing coating or cleanup material employed during the month;
 - c. the organic HAP content of each coating and cleanup material, in pounds per gallon; and
 - d. the total organic HAP emission rate for all coatings and cleanup materials, in tons.

(Authority for term: OAC rule 3745-31-05(D))

- (2) For any month that a material containing no organic HAP is used:
 - a. the company identification for each coating or cleanup material employed that contains no organic HAP employed during the month (a coating may be assumed to be employed during the month if it is purchased or released); and



- b. the Material Safety Data Sheet or coating sheet for the coating or cleanup material identified in 4.b)(2)a.

(Authority for term: OAC rule 3745-31-05(D))

- c) The permittee shall collect and record the following information each month for McWane Poles (0616015010):
- (1) the throughput of coating and cleanup material usage, in gallons, for each month (K022);
 - (2) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of coating and cleanup material usage (K022);
 - (3) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of coating and cleanup material usage, for each calendar month (K022);
 - (4) the throughput of poles, in tons, for each month (P902-P906);
 - (5) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of poles, in tons (P902-P906);
 - (6) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of poles, in tons, for each calendar month (P902-P906);
 - (7) the operating hours for Cartridge Filter A and Cartridge Filter C;
 - (8) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the operating hours of Cartridge Filter A and Cartridge Filter C;
 - (9) also, during the first 12 calendar months of operation, the permittee shall record the cumulative operating hours of Cartridge Filter A and Cartridge Filter C for each calendar month;
 - (10) the throughput of electrode, in tons, for each month (P907 and P908);
 - (11) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of electrode, in tons (P907 and P908);
 - (12) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of electrode, in tons for each calendar month (P907 and P908);
 - (13) the throughput of grit, in tons, for each month (P909);
 - (14) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of grit, in tons (P909);
 - (15) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of grit, in tons for each calendar month (P909);



- (16) the throughput of topcoat, in gallons, for each month (R008);
- (17) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of topcoat, in gallons (R008);
- (18) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of topcoat, in gallons, for each calendar month (R008);
- (19) the throughput of cleanup, in gallons for each month (R008);
- (20) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of cleanup, in gallons (R008);
- (21) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of cleanup, in gallons, for each calendar month (R008);
- (22) the maximum heat input of the drying oven, in million BTU, for each month (R008);
- (23) beginning after the first 12 calendar months of operation, the rolling 12-month summation of the maximum heat input of the drying oven, in million BTU (R008);
- (24) also during the first 12 calendar months of operation, the permittee shall record the cumulative maximum heat input of the drying oven, in million BTU, for each calendar month (R008); and,
- (25) the rolling, 12-month summation of the facility-wide individual HAP and facility-wide total combined HAP emissions, in tons.

(Authority for term: OAC rule 3745-31-05(D))

- d) The permittee shall maintain monthly records of the rolling, 12-month summation of the facility-wide, McWane Poles (0616015010) and Clow Water Systems (0616010006) combined, HAP and facility-wide total combined HAP emissions, in tons (Summation of 4.a)(4), 4.b)(1)d., and 4.c)(25)). The facility, Clow Water Systems (0616010006) combined with McWane Poles (0616015010), has sufficient records to begin calculating and tracking compliance with the rolling emissions limitations and operational restrictions upon issuance of this permit.

(Authority for term: OAC rule 3745-31-05(D))

5. Reporting Requirements

- a) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(Authority for term: OAC rule 3745 15 03(B)(1)(a), OAC rule 3745 15 03(C), and OAC rule 3745-31-05(D))

- b) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month summations of facility-wide individual HAP and facility-wide total combined HAP emissions limitations in 2.a). The quarterly deviation (excursion) reports shall be



submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-31-05(D))

- c) The permittee shall notify the Ohio EPA, Southeast District Office of any monthly record showing an exceedance of the rolling, 12-month operational restrictions in 3.a) and 3.c) or any deviation from the no organic HAP coating restrictions specified in 3.b). A copy of such record shall be sent to the Ohio EPA, Southeast District Office within 30 days following the end of the calendar month.

(Authority for term: OAC rule 3745-31-05(D))

6. Testing Requirements

- a) Compliance with the facility-wide (i.e. Clow Water Systems (0616010006) and McWane Poles (0616015010) combined) individual HAP and total combined HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly emissions figures determined in accordance with the recordkeeping requirements in 4.a) and 4.b)(1)(d) for all HAP emitting emission units. Calculations shall follow the methodology presented in Attachment 2 of the amended permit-to-install application received on November 21, 2006, for Clow Water Systems (0616010006), and the methodology presented in the calculations attachment of the amended permit-to-install application received December 10, 2013, for McWane Poles (0616015010) and any subsequent revisions to that methodology approved by Ohio EPA.

(Authority for term: OAC rule 3745-31-05(D))

- b) Compliance with the annual operational restrictions (throughputs, hours of operation, and input of the drying oven) shall be based upon a rolling, 12-month summation of the monthly usage figures determined in accordance with the recordkeeping requirements in 4.a) and 4.c).

(Authority for term: OAC rule 3745-31-05(D))

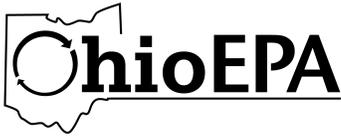
- c) Compliance with the no organic HAP coatings restrictions shall be demonstrated based upon the record keeping requirements specified in 4.b).

(Authority for term: OAC rule 3745-31-05(D))



Final Permit-to-Install
McWane Poles
Permit Number: P0115154
Facility ID: 0616015010
Effective Date: 9/22/2014

C. Emissions Unit Terms and Conditions



1. **K022, Touch Up Coating**

Operations, Property and/or Equipment Description:

Touch up coating with a maximum hourly throughput of 0.25 gal/hr and an annual throughput limitation of 2,190 gallons of coating per rolling 12-month period; coating is rolled on and air dried with no control system.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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 11/30/2001	The emissions limitation established pursuant to this rule is equivalent to the emissions limitation established pursuant to OAC rule 3745-31-05(D). See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006	See b)(2)b. below.
c.	OAC rule 3745-31-05(D) [Synthetic minor restriction to avoid major modification status and PSD review]	Volatile organic compound (VOC) emissions shall not exceed 0.73 ton as a rolling, 12-month summation. See c)(1) and c)(2) below.
d.	OAC rule 3745-31-09(U)(2)(e)(iii)	Exempt. See b)(2)c. below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 emissions 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 revision 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 OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

(Authority for term: OAC rule 3745-31-05(A))

- 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 VOC emissions from this air contaminant source since the uncontrolled potential to emit for the VOC emissions is less than 10 TPY.

(Authority for term: OAC rule 3745-31-05(A))

- c. The permittee shall not employ more than ten gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.

(Authority for term: OAC rule 3745-21-09(U)(2))

c) Operational Restrictions

- (1) The permittee has requested a federally enforceable limitation on the maximum annual throughput of coating for this emissions unit in order to restrict the federally enforceable potential to emit to avoid major modification status. The maximum annual throughput for this emissions unit shall not exceed 2,190 gallons of coating, based upon a rolling, 12-month summation of the coating throughput.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating throughput levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Throughput (gallons)
1	186
1-2	372
1-3	558
1-4	744
1-5	930
1-6	1,116
1-7	1,302



1-8	1,488
1-9	1,674
1-10	1,860
1-11	2,046
1-12	2,190

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

(Authority for term: OAC rule 3745-31-05(D))

(2) The VOC content of coatings shall not exceed 0.67 lb/gallon of coating, as applied.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the coating line:

- a. the name and identification number of each coating applied;
- b. the volume, in gallons, of each coating applied;
- c. the VOC content, in pounds per gallon, of each coating, as applied (including any additives or thinners, if applicable);
- d. the VOC emissions from coating (VOC), in tons of VOC per month calculated as follows:

$$VOC \left(\frac{tons}{month} \right) = \frac{\sum_{i=1}^n (G \times C)}{\left(2,000 \frac{lbs}{ton} \right)}$$

Where:

G = volume of each coating applied, in gallons, as recorded in d)(1)b. above;

C = VOC content of each coating, as applied, in pounds per gallon, as recorded in d)(1)c. above; and,

n = total number of coatings employed during the month.

- e. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of coating usage;
- f. also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of coating, for each calendar month; and,



g. the rolling, 12-month summation of the VOC emissions, in tons.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-31-05(D))

(2) The permittee shall collect and record the following information each day for this emissions unit:

a. The name and identification number of each metal coating employed.

b. The number of gallons of each metal coating employed.

c. The total number of gallons of all the metal coatings employed.

(Authority for term: OAC rules 3745-21-09(U)(2)(e)(iii))

e) Reporting Requirements

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

a. all exceedances of the rolling, 12-month limitation on the throughput of coating for this emissions unit;

b. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative throughput of coating for this emissions unit;

c. all exceedances of the rolling, 12-month VOC limitation.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), and OAC rule 3745-31-05(D))

(2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

(Authority for term: OAC rules 3745-21-09(U)(2)(e)(iii))



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

VOC emissions shall not exceed 0.73 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation may be demonstrated through the recordkeeping required in d)(1) above.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-31-05(D))

g) Miscellaneous Requirements

(1) None.



2. P902, Plasma Spigot Cut

Operations, Property and/or Equipment Description:

Plasma Spigot Cut with a maximum hourly throughput of 12 tons/hr and an annual throughput limitation of 27,000 tons per rolling 12-month period; Controlled by Cartridge Filter A with a 90% capture efficiency, an outlet grain loading of 0.0075 gr/dscf and an air flow of 4,000 acfm.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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 11/30/2001	The emissions limitation established pursuant to this rule is equivalent to the emissions limitation established pursuant to OAC rule 3745-31-05(D). See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006	See b)(2)b. below.
c.	OAC rule 3745-31-05(D) [Synthetic minor restriction to avoid major modification status and PSD review]	Fugitive particulate emissions (PE) shall not exceed 0.10 ton as a rolling, 12-month summation. Fugitive PM ₁₀ emissions shall not exceed 0.05 ton as a rolling, 12-month summation. Fugitive PM _{2.5} emissions shall not exceed 0.015 ton as a rolling, 12-month summation. Stack PE/PM ₁₀ /PM _{2.5} from Cartridge Filter A, controlling emissions units P902, P903, and P904, shall not exceed 0.77 ton as a rolling, 12-month summation. See b)(2)d., b)(2)e., c)(1), and c)(3) below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(B) OAC rule 3745-17-08(B)	See b)(2)c. below.
e.	OAC rule 3745-17-11(B)(1)	<p>PE from any stack serving this emissions unit shall not exceed 21.67 lbs/hr.</p> <p>The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3), until U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05.</p>
f.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
g.	OAC rule 3745-31-05(E) [Voluntary restriction to show compliance with a 90% capture efficiency]	No visible emissions of fugitive PE from the building egress points.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 emissions 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 revision 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 OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

(Authority for term: OAC rule 3745-31-05(A))

- 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 uncontrolled potential to emit for the particulate emissions is less than 10 TPY.

(Authority for term: OAC rule 3745-31-05(A))



- c. This facility is not subject to OAC rule 3745-17-07 or OAC rule 3745-17-08 because this facility is located in Coshocton Township which is not identified as an Appendix A area pursuant to OAC rule 3745-17-08.

(Authority for term: OAC rule 3745-17-07 and OAC rule 3745-17-08)

- d. The emissions from emissions units P902, P903 and P904 shall be vented to a baghouse (Cartridge Filter A) when one or more of the emissions units are in operation.

(Authority for term: OAC rule 3745-31-05(A), OAC rule 3745-31-05(D))

- e. For purposes of securing federally enforceable terms to avoid federal PSD, the following is needed:

- i. This emissions unit shall be controlled with a baghouse with a capture efficiency of 90% an outlet loading not to exceed 0.0075 gr/dscf of PE/PM₁₀/PM_{2.5}.

(Authority for term: OAC rule 3745-31-05(D))

c) Operational Restrictions

- (1) The permittee has requested a federally enforceable limitation on the maximum annual throughput of poles for this emissions unit in order to restrict the federally enforceable potential to emit to avoid major modification status for PE/PM₁₀/PM_{2.5}. The maximum annual throughput for this emissions unit shall not exceed 27,000 tons of poles, based upon a rolling, 12-month summation of the throughput.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the throughput levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Throughput (tons)
1	8,928
1-2	17,856
1-3	26,784
1-4	27,000
1-5	27,000
1-6	27,000
1-7	27,000
1-8	27,000



1-9	27,000
1-10	27,000
1-11	27,000
1-12	27,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

(Authority for term: OAC rule 3745-31-05(D))

- (2) The permittee shall properly install, operate, and maintain the control equipment when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The control equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer’s recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

(Authority for term: OAC rule 3745-31-05(A))

- (3) The permittee has requested a federally enforceable limitation on the annual hours of operation of Cartridge Filter A in order to restrict the federally enforceable potential to emit to avoid major modification status for PE/PM₁₀/PM_{2.5}. The maximum annual operating hours for Cartridge Filter A, controlling emissions units P902, P903, and P904, shall not exceed 6,000 hours, based upon a rolling, 12-month rolling summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours for Cartridge Filter A specified in the following table:

Month(s)	Maximum Allowable Cumulative Operating Hours
1	744
1-2	1,488
1-3	2,232
1-4	2,976
1-5	3,720
1-6	4,464
1-7	5,208
1-8	5,952



1-9	6,000
1-10	6,000
1-11	6,000
1-12	6,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

(Authority for term: OAC rule 3745-31-05(D))

d) Monitoring and/or Recordkeeping Requirements

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

- a. the throughput of poles, in tons, for each month;
- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of poles, in tons;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of poles, in tons, for each calendar month.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the operating hours for Cartridge Filter A;
- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the operating hours of Cartridge Filter A;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative operating hours of Cartridge Filter A for each calendar month.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the monthly fugitive emissions of PE, PM₁₀, and PM_{2.5} from this emissions unit calculated in accordance with the following equations:

$$\text{Fugitive PE (tons/month)} = (\text{actual throughput of poles (as recorded (d)(1)a.)}) * (0.072 * \text{lb PE/ton of poles}) * (1 - \text{capture efficiency (0.90)})$$

$$\text{Fugitive PM}_{10} \text{ (tons/month)} = (\text{actual throughput of poles (as recorded (d)(1)a.)}) * (0.037 * \text{lb PE/(on of poles)}) * (1 - \text{capture efficiency (0.90)})$$



Fugitive $PM_{2.5}$ (tons/month) = (actual throughput of poles (as recorded (d)(1)a.)) * (0.011**lb PE/(on of poles)) * (1-capture efficiency (0.90))

* AP-42 Ch.12 Related Min Document: Emissions of Fume, Nitrogen Oxides and Noise in Cutting of Stainless and Mild Steel (March 1994)

** EPA PM Calculator SCC 30903088

- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of fugitive emissions of PE, PM_{10} and $PM_{2.5}$ from this emissions unit;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative fugitive emissions of PE, PM_{10} and $PM_{2.5}$ for each calendar month for this emissions unit.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the monthly stack emissions of PE, PM_{10} , and $PM_{2.5}$ from P902, P903, and P904 combined calculated in accordance with the following equation:

Stack PE/ PM_{10} / $PM_{2.5}$ (tons/month) = (actual operating hours for Cartridge Filter A (as recorded (d)(2)a.)) * (0.0075 gr/dscf) * (4,000 acfm) * (1lb / 7,000 gr) * (60 min/hr)

- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of stack emissions of PE, PM_{10} and $PM_{2.5}$ from P902, P903, and P904 combined;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative stack emissions of PE, PM_{10} and $PM_{2.5}$ for each calendar month from P902, P903, and P904 combined.

(Authority for term: OAC rule 3745-31-05(D))

(5) The permittee shall properly install, 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 weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

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.

The acceptable range for the pressure drop across the baghouse is 1 to 10 inches of water.

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 appropriate Ohio EPA District Office or local air agency. 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 a minor permit modification.

(Authority for term: OAC rule 3745-31-05(A))



e) Reporting Requirements

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

- a. all exceedances of the rolling, 12-month limitation on the throughput of poles for this emissions unit;
- b. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative throughput of poles for this emissions unit;
- c. all exceedances of the rolling, 12-month limitation on the hours of operation for Cartridge Filter A;
- d. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative hours of operation for Cartridge Filter A;
- e. all exceedances of the rolling, 12-month limitation of PE/PM₁₀/PM_{2.5} found in b)(1)c. above.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(D))

(2) The permittee shall submit quarterly reports that identify:

- 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 range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
- 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 "(2)a." (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in "(2)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 "(2)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.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(A))

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Design Efficiency Standard:

This emissions unit shall be controlled with a baghouse with a capture efficiency of 90% an outlet loading not to exceed 0.0075 gr/dscf of PE/PM₁₀/PM_{2.5}.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

- b. Emissions Limitation:

Fugitive PE shall not exceed 0.10 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the recordkeeping requirements in d)(3) above.

- c. Emissions Limitation:

Fugitive PM₁₀ emissions shall not exceed 0.05 ton as a rolling, 12-month summation.



Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the recordkeeping requirements in d)(3) above.

d. Emissions Limitation:

Fugitive PM_{2.5} emissions shall not exceed 0.015 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the recordkeeping requirements in d)(3) above.

e. Emissions Limitation:

Stack PE/PM₁₀/PM_{2.5} from Cartridge Filter A, controlling emissions units P902, P903, and P904, shall not exceed 0.77 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the recordkeeping requirements in d)(4) above.

f. Emissions Limitation:

PE from any stack serving this emissions unit shall not exceed 21.67 lbs/hr.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

g. Emissions Limitation:

Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

h. Emissions Limitation:

No visible emissions of fugitive PE from the building egress points.

Applicable Compliance Method

Visible particulate emissions shall be determined according to USEPA Method 22. See f)(2).



- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and mass emission limitation for PE/PM₁₀/PM_{2.5}.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

PE, Methods 1-5 found in 40 CFR Part 60, Appendix A

PM₁₀, Method 201A found in 40 CFR Part 51, Appendix M

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The capture efficiency shall be determined using Method 22 for all egress points of the enclosure (building), or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).



- g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install (PTI) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.



3. P903, Plasma Bell Cut

Operations, Property and/or Equipment Description:

Plasma Bell Cut with a maximum hourly throughput of 12 tons/hr and an annual throughput limitation of 27,000 tons per rolling 12-month period; Controlled by Cartridge Filter A with a 90% capture efficiency, an outlet grain loading of 0.0075 gr/dscf and an air flow of 4,000 acfm.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1)

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operation(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 are identified below. 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 11/30/2001	The emissions limitation established pursuant to this rule is equivalent to the emissions limitation established pursuant to OAC rule 3745-31-05(D). See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006	See b)(2)b. below.
c.	OAC rule 3745-31-05(D) [Synthetic minor restriction to avoid major modification status and PSD review]	Fugitive particulate emissions (PE) shall not exceed 0.10 ton as a rolling, 12-month summation. Fugitive PM ₁₀ emissions shall not exceed 0.05 tons a rolling, 12-month summation. Fugitive PM _{2.5} emissions shall not exceed 0.015 ton as a rolling, 12-month summation. Stack PE/PM ₁₀ /PM _{2.5} from Cartridge Filter A, controlling emissions units P902, P903, and P904, shall not exceed 0.77 ton as a rolling, 12-month summation. See b)(2)d., b)(2)e., c)(1), and c)(3) below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(B) OAC rule 3745-17-08(B)	See b)(2)c. below.
e.	OAC rule 3745-17-11(B)(1)	<p>PE from any stack serving this emissions unit shall not exceed 21.67 lbs/hr.</p> <p>The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3), until U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05.</p>
f.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
g.	OAC rule 3745-31-05(E) [Voluntary restriction to show compliance with a 90% capture efficiency]	No visible emissions of fugitive PE from the building egress points.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 emissions 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 revision 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 OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

(Authority for term: OAC rule 3745-31-05(A))

- 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 uncontrolled potential to emit for the particulate emissions is less than 10 TPY.

(Authority for term: OAC rule 3745-31-05(A))



- c. This facility is not subject to OAC rule 3745-17-07 or OAC rule 3745-17-08 because this facility is located in Coshocton Township which is not identified as an Appendix A area pursuant to OAC rule 3745-17-08.

(Authority for term: OAC rule 3745-17-07 and OAC rule 3745-17-08)

- d. The emissions from emissions units P902, P903 and P904 shall be vented to a baghouse (Cartridge Filter A) when one or more of the emissions units are in operation.

(Authority for term: OAC rule 3745-31-05(A), OAC rule 3745-31-05(D))

- e. For purposes of securing federally enforceable terms to avoid federal PSD, the following is needed:

- i. This emissions unit shall be controlled with a baghouse with a capture efficiency of 90% an outlet loading not to exceed 0.0075 gr/dscf of PE/PM₁₀/PM_{2.5}.

(Authority for term: OAC rule 3745-31-05(D))

c) Operational Restrictions

- (1) The permittee has requested a federally enforceable limitation on the maximum annual throughput of poles for this emissions unit in order to restrict the federally enforceable potential to emit to avoid major modification status for PE/PM₁₀/PM_{2.5}. The maximum annual throughput for this emissions unit shall not exceed 27,000 tons of poles, based upon a rolling, 12-month summation of the throughput.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the throughput levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Throughput (tons)
1	8,928
1-2	17,856
1-3	26,784
1-4	27,000
1-5	27,000
1-6	27,000
1-7	27,000
1-8	27,000



1-9	27,000
1-10	27,000
1-11	27,000
1-12	27,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

(Authority for term: OAC rule 3745-31-05(D))

- (2) The permittee shall properly install, operate, and maintain the control equipment when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The control equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer’s recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

(Authority for term: OAC rule 3745-31-05(A))

- (3) The permittee has requested a federally enforceable limitation on the annual hours of operation of Cartridge Filter A in order to restrict the federally enforceable potential to emit to avoid major modification status for PE/PM₁₀/PM_{2.5}. The maximum annual operating hours for Cartridge Filter A, controlling emissions units P902, P903, and P904, shall not exceed 6,000 hours, based upon a rolling, 12-month rolling summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours for Cartridge Filter A specified in the following table:

Month(s)	Maximum Allowable Cumulative Operating Hours
1	744
1-2	1,488
1-3	2,232
1-4	2,976
1-5	3,720
1-6	4,464
1-7	5,208
1-8	5,952



1-9	6,000
1-10	6,000
1-11	6,000
1-12	6,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

(Authority for term: OAC rule 3745-31-05(D))

d) Monitoring and/or Recordkeeping Requirements

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

- a. the throughput of poles, in tons, for each month;
- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of poles, in tons;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of poles, in tons, for each calendar month.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the operating hours for Cartridge Filter A;
- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the operating hours of Cartridge Filter A;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative operating hours of Cartridge Filter A for each calendar month.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the monthly fugitive emissions of PE, PM₁₀, and PM_{2.5} from this emissions unit calculated in accordance with the following equations:

$$\text{Fugitive PE (tons/month)} = (\text{actual throughput of poles (as recorded (d)(1)a.)}) * (0.072 * \text{lb PE/ton of poles}) * (1 - \text{capture efficiency (0.90)})$$

$$\text{Fugitive PM}_{10} \text{ (tons/month)} = (\text{actual throughput of poles (as recorded (d)(1)a.)}) * (0.037 * \text{lb PE/(on of poles)}) * (1 - \text{capture efficiency (0.90)})$$



Fugitive PM_{2.5} (tons/month) = (actual throughput of poles (as recorded (d)(1)a.)) * (0.011**lb PE/(on of poles)) * (1-capture efficiency (0.90))

* AP-42 Ch.12 Related Min Document: Emissions of Fume, Nitrogen Oxides and Noise in Cutting of Stainless and Mild Steel (March 1994)

** EPA PM Calculator SCC 30903088

- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of fugitive emissions of PE, PM₁₀ and PM_{2.5} from this emissions unit;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative fugitive emissions of PE, PM₁₀ and PM_{2.5} for each calendar month for this emissions unit.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the monthly stack emissions of PE, PM₁₀, and PM_{2.5} from P902, P903, and P904 combined calculated in accordance with the following equation:

Stack PE/PM₁₀/PM_{2.5} (tons/month) = (actual operating hours for Cartridge Filter A (as recorded (d)(2)a.)) * (0.0075 gr/dscf) * (4,000 acfm) * (1lb / 7,000 gr) * (60 min/hr)

- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of stack emissions of PE, PM₁₀ and PM_{2.5} from P902, P903, and P904 combined;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative stack emissions of PE, PM₁₀ and PM_{2.5} for each calendar month from P902, P903, and P904 combined.

(Authority for term: OAC rule 3745-31-05(D))

(5) The permittee shall properly install, 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 weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

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.

The acceptable range for the pressure drop across the baghouse is 1 to 10 inches of water.

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 appropriate Ohio EPA District Office or local air agency. 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 a minor permit modification.

(Authority for term: OAC rule 3745-31-05(A))



e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify:
 - a. all exceedances of the rolling, 12-month limitation on the throughput of poles for this emissions unit;
 - b. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative throughput of poles for this emissions unit;
 - c. all exceedances of the rolling, 12-month limitation on the hours of operation for Cartridge Filter A;
 - d. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative hours of operation for Cartridge Filter A;
 - e. all exceedances of the rolling, 12-month limitation of PE/PM₁₀/PM_{2.5} found in b)(1)c. above.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(D))

- (2) The permittee shall submit quarterly reports that identify:
 - 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 range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - 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 "(2)a." (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "(2)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 "(2)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.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(A))

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Design Efficiency Standard:

This emissions unit shall be controlled with a baghouse with a capture efficiency of 90% an outlet loading not to exceed 0.0075 gr/dscf of PE/PM₁₀/PM_{2.5}.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

- b. Emissions Limitation:

Fugitive PE shall not exceed 0.10 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

- c. Emissions Limitation:

Fugitive PM₁₀ emissions shall not exceed 0.05 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.



d. Emissions Limitation:

Fugitive PM_{2.5} emissions shall not exceed 0.015 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

e. Emissions Limitation:

Stack PE/PM₁₀/PM_{2.5} from Cartridge Filter A, controlling emissions units P902, P903, and P904, shall not exceed 0.77 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(4) above.

f. Emissions Limitation:

PE from any stack serving this emissions unit shall not exceed 21.67 lbs/hr.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

g. Emissions Limitation:

Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

h. Emissions Limitation:

No visible emissions of fugitive PE from the building egress points.

Applicable Compliance Method

Visible particulate emissions shall be determined according to USEPA Method 22. See f)(2).



- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and mass emission limitation for PE/PM₁₀/PM_{2.5}.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

PE, Methods 1-5 found in 40 CFR Part 60, Appendix A

PM₁₀, Method 201A found in 40 CFR Part 51, Appendix M

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The capture efficiency shall be determined using Method 22 for all egress points of the enclosure (building) or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).



- g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install (PTI) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.



4. P904, Deburr Grind

Operations, Property and/or Equipment Description:

Deburr Grind with a maximum hourly throughput of 12 tons/hr and an annual throughput limitation of 27,000 tons per rolling 12-month period; Controlled by Cartridge Filter A with a 90% capture efficiency, an outlet grain loading of 0.0075 gr/dscf and an air flow of 4,000 acfm.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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 11/30/2001	The emissions limitation established pursuant to this rule is equivalent to the emissions limitation established pursuant to OAC rule 3745-31-05(D). See b)(2)a. below.
b.	OAC rule 3745-31-05(C), as effective 12/01/2006	See b)(2)b. below.
c.	OAC rule 3745-31-05(D) [Synthetic minor restriction to avoid major modification status and PSD review, and BAT for PE/PM ₁₀ /PM _{2.5}]	Fugitive particulate emissions (PE) shall not exceed 2.16 tons as a rolling, 12-month summation. Fugitive PM ₁₀ emissions shall not exceed 0.01 ton as a rolling, 12-month summation. Fugitive PM _{2.5} emissions shall not exceed 0.01 ton as a rolling, 12-month summation. Stack PE/PM ₁₀ /PM _{2.5} from Cartridge Filter A, controlling emissions units P902, P903, and P904, shall not exceed 0.77 ton as a rolling, 12-month summation. See b)(2)d., b)(2)e., c)(1), and c)(3) below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(B) OAC rule 3745-17-08(B)	See b)(2)c. below.
e.	OAC rule 3745-17-11(B)(1)	PE from any stack serving this emissions unit shall not exceed 21.67 lbs/hr. The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3), until U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05.
f.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
g.	OAC rule 3745-31-05(E) [Voluntary restriction to show compliance with a 90% capture efficiency]	No visible emissions of fugitive PE from the building egress points.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 emissions 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 revision 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 OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

(Authority for term: OAC rule 3745-31-05(A))

- 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.

Permit-to-install P0115154 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. Install a cartridge filter with a 90% capture efficiency and a 99% control efficiency;



- ii. PE from Cartridge Filter A, controlling emissions units P902, P903, and P904, and fugitive PE combined shall not exceed 2.93 tons as a rolling, 12-month summation;
- iii. PM_{10} from Cartridge Filter A, controlling emissions units P902, P903, and P904 and fugitive PM_{10} combined shall not exceed 0.78 tons as a rolling, 12-month summation; and,
- iv. $PM_{2.5}$ from Cartridge Filter A, controlling emissions units P902, P903, and P904, and fugitive $PM_{2.5}$ combined shall not exceed 0.78 tons as a rolling, 12-month summation.

(Authority for term: OAC rule 3745-31-05(C))

- c. This facility is not subject to OAC rule 3745-17-07 or OAC rule 3745-17-08 because this facility is located in Coshocton Township which is not identified as an Appendix A area pursuant to OAC rule 3745-17-08.

(Authority for term: OAC rule 3745-17-07 and OAC rule 3745-17-08)

- d. The emissions from emissions units P902, P903 and P904 shall be vented to a baghouse (Cartridge Filter A) when one or more of the emissions units are in operation.

(Authority for term: OAC rule 3745-31-05(A), OAC rule 3745-31-05(D))

- e. For purposes of securing federally enforceable terms to avoid federal PSD, the following is needed:

- i. This emissions unit shall be controlled with a baghouse with a capture efficiency of 90% an outlet loading not to exceed 0.0075 gr/dscf of PE/ PM_{10} / $PM_{2.5}$.

(Authority for term: OAC rule 3745-31-05(D))

c) Operational Restrictions

- (1) The permittee has requested a federally enforceable limitation on the maximum annual throughput of poles for this emissions unit in order to restrict the federally enforceable potential to emit to avoid major modification status for PE/ PM_{10} / $PM_{2.5}$. The maximum annual throughput for this emissions unit shall not exceed 27,000 tons of poles, based upon a rolling, 12-month summation of the throughput.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the throughput levels specified in the following table:



Month(s)	Maximum Allowable Cumulative Throughput (tons)
1	8,928
1-2	17,856
1-3	26,784
1-4	27,000
1-5	27,000
1-6	27,000
1-7	27,000
1-8	27,000
1-9	27,000
1-10	27,000
1-11	27,000
1-12	27,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

(Authority for term: OAC rule 3745-31-05(D))

- (2) The permittee shall properly install, operate, and maintain the control equipment when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The control equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

(Authority for term: OAC rule 3745-31-05(A))

- (3) The permittee has requested a federally enforceable limitation on the annual hours of operation of Cartridge Filter A in order to restrict the federally enforceable potential to emit to avoid major modification status for PE/PM₁₀/PM_{2.5}. The maximum annual operating hours for Cartridge Filter A, controlling emissions units P902, P903, and P904, shall not exceed 6,000 hours, based upon a rolling, 12-month rolling summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours for Cartridge Filter A specified in the following table:



Month(s)	Maximum Allowable Cumulative Operating Hours
1	744
1-2	1,488
1-3	2,232
1-4	2,976
1-5	3,720
1-6	4,464
1-7	5,208
1-8	5,952
1-9	6,000
1-10	6,000
1-11	6,000
1-12	6,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

(Authority for term: OAC rule 3745-31-05(D))

d) Monitoring and/or Recordkeeping Requirements

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

- a. the throughput of poles, in tons, for each month;
- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of poles, in tons;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of poles, in tons, for each calendar month.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the operating hours for Cartridge Filter A;
- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the operating hours of Cartridge Filter A;



- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative operating hours of Cartridge Filter A for each calendar month.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the monthly fugitive emissions of PE, PM₁₀, and PM_{2.5} from this emissions unit calculated in accordance with the following equations:

Fugitive PE (tons/month) = (actual throughput of poles (as recorded (d)(1)a.)) * (1.600 * lb PE/ton of poles) * (1 - capture efficiency (0.90))

Fugitive PM₁₀ (tons/month) = (actual throughput of poles (as recorded (d)(1)a.)) * (0.0045 * lb PE/(on of poles)) * (1 - capture efficiency (0.90))

Fugitive PM_{2.5} (tons/month) = (actual throughput of poles (as recorded (d)(1)a.)) * (0.0045 * lb PE/(on of poles)) * (1 - capture efficiency (0.90))

* An Inventory of Iron Foundry Emissions, Modern Castings, January 1972 p46, emissions are for PM < 50 microns in size

** EPA PM10 Emission Factor Listing (Nov 1989) 3-04-003-60 Castings Finishing

- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of fugitive emissions of PE, PM₁₀ and PM_{2.5} from this emissions unit;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative fugitive emissions of PE, PM₁₀ and PM_{2.5} for each calendar month for this emissions unit.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the monthly stack emissions of PE, PM₁₀, and PM_{2.5} from P902, P903, and P904 combined calculated in accordance with the following equation:

Stack PE/PM₁₀/PM_{2.5} (tons/month) = (actual operating hours for Cartridge Filter A (as recorded (d)(2)a.)) * (0.0075 gr/dscf) * (4,000 acfm) * (1 lb / 7,000 gr) * (60 min/hr)

- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of stack emissions of PE, PM₁₀ and PM_{2.5} from P902, P903, and P904 combined;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative stack emissions of PE, PM₁₀ and PM_{2.5} for each calendar month from P902, P903, and P904 combined.

(Authority for term: OAC rule 3745-31-05(D))



- (5) The permittee shall properly install, 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 weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

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.



The acceptable range for the pressure drop across the baghouse is 1 to 10 inches of water.

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 appropriate Ohio EPA District Office or local air agency. 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 a minor permit modification.

(Authority for term: OAC rule 3745-31-05(A))

e) Reporting Requirements

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

- a. all exceedances of the rolling, 12-month limitation on the throughput of poles for this emissions unit;
- b. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative throughput of poles for this emissions unit;
- c. all exceedances of the rolling, 12-month limitation on the hours of operation for Cartridge Filter A;
- d. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative hours of operation for Cartridge Filter A;
- e. all exceedances of the rolling, 12-month limitation of PE/PM₁₀/PM_{2.5} found in b)(1)c. above.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(D))

(2) The permittee shall submit quarterly reports that identify:

- 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 range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;



- 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 "(2)a." (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in "(2)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 "(2)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.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(A))

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Design Efficiency Standard:

This emissions unit shall be controlled with a baghouse with a capture efficiency of 90% an outlet loading not to exceed 0.0075 gr/dscf of PE/PM₁₀/PM_{2.5}.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

- b. Emissions Limitation:

Fugitive PE shall not exceed 2.16 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.



c. Emissions Limitation:

Fugitive PM₁₀ emissions shall not exceed 0.01 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

d. Emissions Limitation:

Fugitive PM_{2.5} emissions shall not exceed 0.01 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

e. Emissions Limitation:

Stack PE/PM₁₀/PM_{2.5} from Cartridge Filter A, controlling emissions units P902, P903, and P904, shall not exceed 0.77 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(4) above.

f. Emissions Limitation:

PE from any stack serving this emissions unit shall not exceed 21.67 lbs/hr.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

g. Emissions Limitation:

Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

h. Emissions Limitation:

No visible emissions of fugitive PE from the building egress points.



Applicable Compliance Method

Visible particulate emissions shall be determined according to USEPA Method 22. See f)(2).

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and mass emission limitation for PE/PM₁₀/PM_{2.5}.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

PE, Methods 1-5 found in 40 CFR Part 60, Appendix A

PM₁₀, Method 201A found in 40 CFR Part 51, Appendix M

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The capture efficiency shall be determined using Method 22 for all egress points of the enclosure (building) or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be



conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install (PTI) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.



5. P905, ID Grind

Operations, Property and/or Equipment Description:

ID Grind with a maximum hourly throughput of 12.25 tons/hr and an annual throughput limitation of 27,000 tons per rolling 12-month period; Controlled by Cartridge Filter B with a 90% capture efficiency, an outlet grain loading of 0.0075 gr/dscf and an air flow of 2,000 acfm.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) g)(1)
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(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 are identified below. 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 11/30/2001	The emissions limitation established pursuant to this rule is equivalent to the emissions limitation established pursuant to OAC rule 3745-31-05(D). See b)(2)a. below.
b.	OAC rule 3745-31-05(C), as effective 12/01/2006	See b)(2)b. below.
c.	OAC rule 3745-31-05(D) [Synthetic minor restriction to avoid major modification status and PSD review, and BAT for PE/PM ₁₀ /PM _{2.5}]	Fugitive particulate emissions (PE) shall not exceed 2.16 tons as a rolling, 12-month summation. Fugitive PM ₁₀ emissions shall not exceed 0.01 ton as a rolling, 12-month summation. Fugitive PM _{2.5} emissions shall not exceed 0.01 ton as a rolling, 12-month summation. Stack PE/PM ₁₀ /PM _{2.5} from Cartridge Filter B, controlling emissions unit P905, shall not exceed 0.56 ton as a rolling, 12-month summation. See b)(2)d., b)(2)e., c)(1), and c)(2) below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(B) OAC rule 3745-17-08(B)	See b)(2)c. below.
e.	OAC rule 3745-17-11(B)(1)	PE from any stack serving this emissions unit shall not exceed 21.97 lbs/hr. The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3), until U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05.
f.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
g.	OAC rule 3745-31-05(E) [Voluntary restriction to show compliance with a 90% capture efficiency]	No visible emissions of fugitive PE from the building egress points.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 emissions 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 revision 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 OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

(Authority for term: OAC rule 3745-31-05(A))

- 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.

Permit-to-install P0115154 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. Install a cartridge filter with a 90% capture efficiency and a 99% control efficiency;



- ii. PE from Cartridge Filter B, controlling emissions unit P905, and fugitive PE combined shall not exceed 2.72 tons as a rolling, 12-month summation;
- iii. PM_{10} from Cartridge Filter B, controlling emissions unit P905 and fugitive PM_{10} combined shall not exceed 0.57 tons as a rolling, 12-month summation; and,
- iv. $PM_{2.5}$ from Cartridge Filter B, controlling emissions unit P905, and fugitive $PM_{2.5}$ combined shall not exceed 0.57 tons as a rolling, 12-month summation.

(Authority for term: OAC rule 3745-31-05(C))

- c. This facility is not subject to OAC rule 3745-17-07 or OAC rule 3745-17-08 because this facility is located in Coshocton Township which is not identified as an Appendix A area pursuant to OAC rule 3745-17-08.

(Authority for term: OAC rule 3745-17-07 and OAC rule 3745-17-08)

- d. The emissions from this emissions unit (P905) shall be vented to a baghouse (cartridge filter B) at all times the emissions unit is in operation.

(Authority for term: OAC rule 3745-31-05(A), OAC rule 3745-31-05(D))

- e. For purposes of securing federally enforceable terms to avoid federal PSD, the following is needed:

- i. This emissions unit shall be controlled with a baghouse with a capture efficiency of 90% an outlet loading not to exceed 0.0075 gr/dscf of PE/ PM_{10} / $PM_{2.5}$.

(Authority for term: OAC rule 3745-31-05(D))

c) Operational Restrictions

- (1) The permittee has requested a federally enforceable limitation on the maximum annual throughput of poles for this emissions unit in order to restrict the federally enforceable potential to emit to avoid major modification status for PE/ PM_{10} / $PM_{2.5}$. The maximum annual throughput for this emissions unit shall not exceed 27,000 tons of poles, based upon a rolling, 12-month summation of the throughput.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the throughput levels specified in the following table:



Month(s)	Maximum Allowable Cumulative Throughput (tons)
1	8,928
1-2	17,856
1-3	26,784
1-4	27,000
1-5	27,000
1-6	27,000
1-7	27,000
1-8	27,000
1-9	27,000
1-10	27,000
1-11	27,000
1-12	27,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

(Authority for term: OAC rule 3745-31-05(D))

- (2) The permittee shall properly install, operate, and maintain the control equipment when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The control equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

(Authority for term: OAC rule 3745-31-05(A))

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of the following information:
 - a. the throughput of poles, in tons, for each month;
 - b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of poles, in tons;
 - c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of poles, in tons, for each calendar month.



(Authority for term: OAC rule 3745-31-05(D))

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

a. the operating hours for Cartridge Filter B.

(Authority for term: OAC rule 3745-31-05(D))

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

a. the monthly fugitive emissions of PE, PM₁₀, and PM_{2.5} from this emissions unit calculated in accordance with the following equations:

Fugitive PE (tons/month) = (actual throughput of poles (as recorded (d)(1)a.))*(1.600*lb PE/ton of poles)*(1-capture efficiency (0.90))

Fugitive PM₁₀ (tons/month) = (actual throughput of poles (as recorded (d)(1)a.))*(0.0045**lb PE/(on of poles)*(1-capture efficiency (0.90))

Fugitive PM_{2.5} (tons/month) = (actual throughput of poles (as recorded (d)(1)a.))*(0.0045**lb PE/(on of poles)*(1-capture efficiency (0.90))

* An Inventory of Iron Foundry Emissions, Modern Castings, January 1972 p46, emissions are for PM<50 microns in size

** EPA PM10 Emission Factor Listing (Nov 1989) 3-04-003-60 Castings Finishing

b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of fugitive emissions of PE, PM₁₀ and PM_{2.5} from this emissions unit;

c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative fugitive emissions of PE, PM₁₀ and PM_{2.5} for each calendar month for this emissions unit.

(Authority for term: OAC rule 3745-31-05(D))

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

a. the monthly stack emissions of PE, PM₁₀, and PM_{2.5} from this emissions unit calculated in accordance with the following equation:

Stack PE/PM₁₀/PM_{2.5} (tons/month) = (actual operating hours for Cartridge Filter B (as recorded (d)(2)a.)) * (0.0075 gr/dscf) * (2,000 acfm) * (1lb / 7,000 gr) * (60 min/hr)

b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of stack emissions of PE, PM₁₀ and PM_{2.5} from this emissions unit;



- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative stack emissions of PE, PM₁₀ and PM_{2.5} for each calendar month from this emissions unit.

(Authority for term: OAC rule 3745-31-05(D))

- (5) The permittee shall properly install, 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 weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

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.

The acceptable range for the pressure drop across the baghouse is 1 to 10 inches of water.

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 appropriate Ohio EPA District Office or local air agency. 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 a minor permit modification.

(Authority for term: OAC rule 3745-31-05(A))

e) Reporting Requirements

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

- a. all exceedances of the rolling, 12-month limitation on the throughput of poles for this emissions unit;
- b. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative throughput of poles for this emissions unit; and,
- c. all exceedances of the rolling, 12-month limitation of PE/PM₁₀/PM_{2.5} found in b)(1)c. above.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(D))

(2) The permittee shall submit quarterly reports that identify:

- 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 range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;



- 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 "(2)a." (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in "(2)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 "(2)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.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(A))

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Design Efficiency Standard:

This emissions unit shall be controlled with a baghouse with a capture efficiency of 90% an outlet loading not to exceed 0.0075 gr/dscf of PE/PM₁₀/PM_{2.5}.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

- b. Emissions Limitation:

Fugitive PE shall not exceed 2.16 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(2) above.



c. Emissions Limitation:

Fugitive PM₁₀ emissions shall not exceed 0.01 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(2) above.

d. Emissions Limitation:

Fugitive PM_{2.5} emissions shall not exceed 0.01 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(2) above.

e. Emissions Limitation:

Stack PE/PM₁₀/PM_{2.5} from Cartridge Filter B, controlling emissions unit P905, shall not exceed 0.56 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

f. Emissions Limitation:

PE from any stack serving this emissions unit shall not exceed 21.97 lbs/hr.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

g. Emissions Limitation:

Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

h. Emissions Limitation:

No visible emissions of fugitive PE from the building egress points.



Applicable Compliance Method

Visible particulate emissions shall be determined according to USEPA Method 22. See f)(2).

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and mass emission limitation for PE/PM₁₀/PM_{2.5}.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

PE, Methods 1-5 found in 40 CFR Part 60, Appendix A

PM₁₀, Method 201A found in 40 CFR Part 51, Appendix M

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The capture efficiency shall be determined using Method 22 for all egress points of the enclosure (building) or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be



conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install (PTI) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.



6. P906, Plasma Length Cut

Operations, Property and/or Equipment Description:

Plasma length cut with a maximum hourly throughput of 12 tons/hr and an annual throughput limitation of 27,000 tons per rolling 12-month period; Controlled by Cartridge Filter C with a 90% capture efficiency, an outlet grain loading of 0.0075 gr/dscf and an air flow of 4,000 acfm.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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 11/30/2001	The emissions limitation established pursuant to this rule is equivalent to the emissions limitation established pursuant to OAC rule 3745-31-05(D). See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006	See b)(2)b. below.
c.	OAC rule 3745-31-05(D) [Synthetic minor restriction to avoid major modification status and PSD review]	Fugitive particulate emissions (PE) shall not exceed 0.10 ton as a rolling, 12-month summation. Fugitive PM ₁₀ emissions shall not exceed 0.05 ton as a rolling, 12-month summation. Fugitive PM _{2.5} emissions shall not exceed 0.015 ton as a rolling, 12-month summation. Stack PE/PM ₁₀ /PM _{2.5} from Cartridge Filter C, controlling emissions units P906 and P907, shall not exceed 0.77 ton as a rolling, 12-month summation. See b)(2)d., b)(2)e., c)(1), and c)(3) below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(B) OAC rule 3745-17-08(B)	See b)(2)c. below.
e.	OAC rule 3745-17-11(B)(1)	<p>PE from any stack serving this emissions unit shall not exceed 21.67 lbs/hr.</p> <p>The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3), until U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05.</p>
f.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
g.	OAC rule 3745-31-05(E) [Voluntary restriction to show compliance with a 90% capture efficiency]	No visible emissions of fugitive PE from the building egress points.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 emissions 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 revision 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 OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

(Authority for term: OAC rule 3745-31-05(A))

- 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 uncontrolled potential to emit for the particulate emissions is less than 10 TPY.

(Authority for term: OAC rule 3745-31-05(A))



- c. This facility is not subject to OAC rule 3745-17-07 or OAC rule 3745-17-08 because this facility is located in Coshocton Township which is not identified as an Appendix A area pursuant to OAC rule 3745-17-08.

(Authority for term: OAC rule 3745-17-07 and OAC rule 3745-17-08)

- d. The emissions from emissions units P906 and P907 shall be vented to a baghouse (Cartridge Filter C) when one or more of the emissions units are in operation.

(Authority for term: OAC rule 3745-31-05(A), OAC rule 3745-31-05(D))

- e. For purposes of securing federally enforceable terms to avoid federal PSD, the following is needed:

- i. This emissions unit shall be controlled with a baghouse with a capture efficiency of 90% an outlet loading not to exceed 0.0075 gr/dscf of PE/PM₁₀/PM_{2.5}.

(Authority for term: OAC rule 3745-31-05(D))

c) Operational Restrictions

- (1) The permittee has requested a federally enforceable limitation on the maximum annual throughput of poles for this emissions unit in order to restrict the federally enforceable potential to emit to avoid major modification status for PE/PM₁₀/PM_{2.5}. The maximum annual throughput for this emissions unit shall not exceed 27,000 tons of poles, based upon a rolling, 12-month summation of the throughput.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the throughput levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Throughput (tons)
1	8,928
1-2	17,856
1-3	26,784
1-4	27,000
1-5	27,000
1-6	27,000
1-7	27,000
1-8	27,000



1-9	27,000
1-10	27,000
1-11	27,000
1-12	27,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

(Authority for term: OAC rule 3745-31-05(D))

- (2) The permittee shall properly install, operate, and maintain the control equipment when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The control equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer’s recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

(Authority for term: OAC rule 3745-31-05(A))

- (3) The permittee has requested a federally enforceable limitation on the annual hours of operation of Cartridge Filter C in order to restrict the federally enforceable potential to emit to avoid major modification status for PE/PM₁₀/PM_{2.5}. The maximum annual operating hours for Cartridge Filter C, controlling emissions units P906 and P907 shall not exceed 6,000 hours, based upon a rolling, 12-month rolling summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours for Cartridge Filter C specified in the following table:

Month(s)	Maximum Allowable Cumulative Operating Hours
1	744
1-2	1,488
1-3	2,232
1-4	2,976
1-5	3,720
1-6	4,464
1-7	5,208
1-8	5,952



1-9	6,000
1-10	6,000
1-11	6,000
1-12	6,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

(Authority for term: OAC rule 3745-31-05(D))

d) Monitoring and/or Recordkeeping Requirements

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

- a. the throughput of poles, in tons, for each month;
- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of poles, in tons;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of poles, in tons, for each calendar month.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the operating hours for Cartridge Filter C;
- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the operating hours of Cartridge Filter C;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative operating hours of Cartridge Filter C for each calendar month.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the monthly fugitive emissions of PE, PM₁₀, and PM_{2.5} from this emissions unit calculated in accordance with the following equations:

$$\text{Fugitive PE (tons/month)} = (\text{actual throughput of poles (as recorded (d)(1)a.)}) * (0.072 * \text{lb PE/ton of poles}) * (1 - \text{capture efficiency (0.90)})$$

$$\text{Fugitive PM}_{10} \text{ (tons/month)} = (\text{actual throughput of poles (as recorded (d)(1)a.)}) * (0.037 * \text{lb PE/(on of poles)}) * (1 - \text{capture efficiency (0.90)})$$



Fugitive $PM_{2.5}$ (tons/month) = (actual throughput of poles (as recorded (d)(1)a.)) * (0.011**lb PE/(on of poles)) * (1-capture efficiency (0.90))

* AP-42 Ch.12 Related Min Document: Emissions of Fume, Nitrogen Oxides and Noise in Cutting of Stainless and Mild Steel (March 1994)

** EPA PM Calculator SCC 30903088

- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of fugitive emissions of PE, PM_{10} and $PM_{2.5}$ from this emissions unit;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative fugitive emissions of PE, PM_{10} and $PM_{2.5}$ for each calendar month for this emissions unit.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the monthly stack emissions of PE, PM_{10} , and $PM_{2.5}$ from P906 and P907 combined calculated in accordance with the following equations:

Stack PE/ PM_{10} / $PM_{2.5}$ (tons/month) = (actual operating hours for Cartridge Filter C (as recorded (d)(2)a.)) * (0.0075 gr/dscf) * (4,000 acfm) * (1lb / 7,000 gr) * (60 min/hr)

- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of stack emissions of PE, PM_{10} and $PM_{2.5}$ from P906 and P907 combined;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative stack emissions of PE, PM_{10} and $PM_{2.5}$ for each calendar month from P906 and P907 combined.

(Authority for term: OAC rule 3745-31-05(D))

(5) The permittee shall properly install, 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 weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

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.

The acceptable range for the pressure drop across the baghouse is 1 to 10 inches of water.

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 appropriate Ohio EPA District Office or local air agency. 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 a minor permit modification.

(Authority for term: OAC rule 3745-31-05(A))

e) Reporting Requirements

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



- a. all exceedances of the rolling, 12-month limitation on the throughput of poles for this emissions unit;
- b. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative throughput of poles for this emissions unit;
- c. all exceedances of the rolling, 12-month limitation on the hours of operation for Cartridge Filter C;
- d. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative hours of operation for Cartridge Filter C; and,
- e. all exceedances of the rolling, 12-month limitations of PE/PM₁₀/PM_{2.5} found in b)(1)c. above.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(D))

- (2) The permittee shall submit quarterly reports that identify:
 - 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 range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - 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 "(2)a." (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "(2)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 "(2)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.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(A))

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Design Efficiency Standard:

This emissions unit shall be controlled with a baghouse with a capture efficiency of 90% an outlet loading not to exceed 0.0075 gr/dscf of PE/PM₁₀/PM_{2.5}.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

b. Emissions Limitation:

Fugitive PE shall not exceed 0.10 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

c. Emissions Limitation:

Fugitive PM₁₀ emissions shall not exceed 0.05 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

d. Emissions Limitation:

Fugitive PM_{2.5} emissions shall not exceed 0.015 ton as a rolling, 12-month summation.



Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

e. Emissions Limitation:

Stack PE/PM₁₀/PM_{2.5} from Cartridge Filter C, controlling emissions units P906, and P907, shall not exceed 0.77 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(4) above.

f. Emissions Limitation:

PE from any stack serving this emissions unit shall not exceed 21.67 lbs/hr.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

g. Emissions Limitation:

Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

h. Emissions Limitation:

No visible emissions of fugitive PE from the building egress points.

Applicable Compliance Method

Visible particulate emissions shall be determined according to USEPA Method 22. See f)(2).

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.



- b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and mass emission limitation for PE/PM₁₀/PM_{2.5}.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

PE, Methods 1-5 found in 40 CFR Part 60, Appendix A

PM₁₀, Method 201A found in 40 CFR Part 51, Appendix M

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- d. The capture efficiency shall be determined using Method 22 for all egress points of the enclosure (building) or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
- e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. 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



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appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install (PTI) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.



7. P907, Base Plate Weld

Operations, Property and/or Equipment Description:

Base plate weld with a maximum hourly throughput of 0.00325 ton of electrode used and a maximum annual throughput limitation of 19.5 tons of electrode per rolling 12-month period; Controlled by Cartridge Filter C with a 90% capture efficiency, an outlet grain loading of 0.0075 gr/dscf and an air flow of 4,000 acfm.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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 11/30/2001	The emissions limitation established pursuant to this rule is equivalent to the emissions limitation established pursuant to OAC rule 3745-31-05(D). See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006	See b)(2)b. below.
c.	OAC rule 3745-31-05(D) [Synthetic minor restriction to avoid major modification status and PSD review]	Fugitive particulate emissions (PE) shall not exceed 0.008 ton as a rolling, 12-month summation. Fugitive PM ₁₀ emissions shall not exceed 0.008 ton as a rolling, 12-month summation. Fugitive PM _{2.5} emissions shall not exceed 0.008 ton as a rolling, 12-month summation. Stack PE/PM ₁₀ /PM _{2.5} from Cartridge Filter C, controlling emissions units P906 and P907, shall not exceed 0.77 ton as a rolling, 12-month summation. See b)(2)d., b)(2)e., c)(1), and c)(3)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		below.
d.	OAC rule 3745-17-07(B) OAC rule 3745-17-08(B)	See b)(2)c. below.
e.	OAC rule 3745-17-11(B)(1)	<p>PE from any stack serving this emissions unit shall not exceed 0.551 lb/hr.</p> <p>The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3), until U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05.</p>
f.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
g.	OAC rule 3745-31-05(E) [Voluntary restriction to show compliance with a 90% capture efficiency]	No visible emissions of fugitive PE from the building egress points.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 emissions 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 revision 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 OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

(Authority for term: OAC rule 3745-31-05(A))

- 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 uncontrolled potential to emit for the particulate emissions is less than 10 TPY.

(Authority for term: OAC rule 3745-31-05(A))



- c. This facility is not subject to OAC rule 3745-17-07 or OAC rule 3745-17-08 because this facility is located in Coshocton Township which is not identified as an Appendix A area pursuant to OAC rule 3745-17-08.

(Authority for term: OAC rule 3745-17-07 and OAC rule 3745-17-08)

- d. The emissions from emissions units P906 and P907 shall be vented to a baghouse (Cartridge Filter C) when one or more of the emissions units are in operation.

(Authority for term: OAC rule 3745-31-05(A), OAC rule 3745-31-05(D))

- e. For purposes of securing federally enforceable terms to avoid federal PSD, the following is needed:

- i. This emissions unit shall be controlled with a baghouse with a capture efficiency of 90% an outlet loading not to exceed 0.0075 gr/dscf of PE/PM₁₀/PM_{2.5}.

(Authority for term: OAC rule 3745-31-05(D))

c) Operational Restrictions

- (1) The permittee has requested a federally enforceable limitation on the maximum annual throughput of electrode for this emissions unit in order to restrict the federally enforceable potential to emit to avoid major modification status for PE/PM₁₀/PM_{2.5}. The maximum annual throughput of electrode for this emissions unit shall not exceed 19.5 tons of electrode, based upon a rolling, 12-month summation of the throughput.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the throughput levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Throughput (tons)
1	2.42
1-2	4.84
1-3	7.25
1-4	9.67
1-5	12.09
1-6	14.51
1-7	16.93
1-8	19.34



1-9	19.5
1-10	19.5
1-11	19.5
1-12	19.5

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

(Authority for term: OAC rule 3745-31-05(D))

- (2) The permittee shall properly install, operate, and maintain the control equipment when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The control equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer’s recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

(Authority for term: OAC rule 3745-31-05(A))

- (3) The permittee has requested a federally enforceable limitation on the annual hours of operation of Cartridge Filter C in order to restrict the federally enforceable potential to emit to avoid major modification status for PE/PM₁₀/PM_{2.5}. The maximum annual operating hours for Cartridge Filter C, controlling emissions units P906 and P907 shall not exceed 6,000 hours, based upon a rolling, 12-month rolling summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours for Cartridge Filter C specified in the following table:

Month(s)	Maximum Allowable Cumulative Operating Hours
1	744
1-2	1,488
1-3	2,232
1-4	2,976
1-5	3,720
1-6	4,464
1-7	5,208
1-8	5,952



1-9	6,000
1-10	6,000
1-11	6,000
1-12	6,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

(Authority for term: OAC rule 3745-31-05(D))

d) Monitoring and/or Recordkeeping Requirements

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

- a. the throughput of electrode, in tons, for each month;
- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of electrode, in tons;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of electrode, in tons, for each calendar month.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the operating hours for Cartridge Filter C;
- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the operating hours of Cartridge Filter C;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative operating hours of Cartridge Filter C for each calendar month.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the monthly fugitive emissions of PE, PM₁₀, and PM_{2.5} from this emissions unit calculated in accordance with the following equation:

$$\text{Fugitive PE/PM}_{10}\text{/PM}_{2.5} \text{ (tons/month)} = (\text{actual throughput of electrode (as recorded (d)(1)a.)}) * (7.80 * \text{lb PE/ton of poles}) * (1 - \text{capture efficiency (0.90)})$$

* AP-42 Table 12.19.-1: Gas metal arc (GMAW) ERNiCrMo wire. (NiCor-55 wire)

- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of fugitive emissions of PE, PM₁₀ and PM_{2.5} from this emissions unit;



- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative fugitive emissions of PE, PM₁₀ and PM_{2.5} for each calendar month for this emissions unit.

(Authority for term: OAC rule 3745-31-05(D))

- (4) The permittee shall maintain monthly records of the following information:
 - a. the monthly stack emissions of PE, PM₁₀, and PM_{2.5} from P906 and P907 combined calculated in accordance with the following equation:

$$\text{Stack PE/PM}_{10}\text{/PM}_{2.5} \text{ (tons/month)} = (\text{actual operating hours for Cartridge Filter C (as recorded (d)(2)a.)}) * (0.0075 \text{ gr/dscf}) * (4,000 \text{ acfm}) * (1\text{lb} / 7,000 \text{ gr}) * (60 \text{ min/hr})$$
 - b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of stack emissions of PE, PM₁₀ and PM_{2.5} from P906 and P907 combined;
 - c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative stack emissions of PE, PM₁₀ and PM_{2.5} for each calendar month from P906 and P904 combined.

(Authority for term: OAC rule 3745-31-05(D))

- (5) The permittee shall properly install, 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 weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

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.

The acceptable range for the pressure drop across the baghouse is 1 to 10 inches of water.

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 appropriate Ohio EPA District Office or local air agency. 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 a minor permit modification.

(Authority for term: OAC rule 3745-31-05(A))

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify:
 - a. all exceedances of the rolling, 12-month limitation on the throughput of electrode for this emissions unit;
 - b. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative throughput of electrode for this emissions unit;
 - c. all exceedances of the rolling, 12-month limitation on the hours of operation for Cartridge Filter C;



- d. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative hours of operation for Cartridge Filter C; and,
- e. all exceedances of the rolling, 12-month limitation on the PE/PM₁₀/PM_{2.5} found in b)(1)c. above.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(D))

(2) The permittee shall submit quarterly reports that identify:

- 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 range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
- 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 "(2)a." (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in "(2)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 "(2)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.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(A))



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Design Efficiency Standard:

This emissions unit shall be controlled with a baghouse with a capture efficiency of 90% an outlet loading not to exceed 0.0075 gr/dscf of PE/PM₁₀/PM_{2.5}.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

b. Emissions Limitation:

Fugitive PE shall not exceed 0.008 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

c. Emissions Limitation:

Fugitive PM₁₀ emissions shall not exceed 0.008 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

d. Emissions Limitation:

Fugitive PM_{2.5} emissions shall not exceed 0.008 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

e. Emissions Limitation:

Stack PE/PM₁₀/PM_{2.5} from Cartridge Filter C, controlling emissions units P906, and P907, shall not exceed 0.77 ton as a rolling, 12-month summation.



Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(4) above.

f. Emissions Limitation:

PE from any stack serving this emissions unit shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

g. Emissions Limitation:

Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

h. Emissions Limitation:

No visible emissions of fugitive PE from the building egress points.

Applicable Compliance Method

Visible particulate emissions shall be determined according to USEPA Method 22. See f)(2).

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and mass emission limitation for PE/PM₁₀/PM_{2.5}.

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

PE, Methods 1-5 found in 40 CFR Part 60, Appendix A

PM₁₀, Method 201A found in 40 CFR Part 51, Appendix M



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

- d. The capture efficiency shall be determined using Method 22 for all egress points of the enclosure (building) or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
 - g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- g) **Miscellaneous Requirements**
- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be



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less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install (PTI) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.



8. P908, Cap Weld

Operations, Property and/or Equipment Description:

Cap weld with a maximum hourly throughput of 0.0033 ton of electrode used and a maximum annual throughput limitation of 19.5 tons of electrode per rolling 12-month period; Controlled by Cartridge Filter D with a 90% capture efficiency, an outlet grain loading of 0.0075 gr/dscf and an air flow of 2,000 acfm.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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 11/30/2001	<p>The emissions limitation established pursuant to this rule is equivalent to the emissions limitation established pursuant to OAC rule 3745-31-05(D).</p> <p>See b)(2)a. below.</p>
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006	See b)(2)b. below.
c.	OAC rule 3745-31-05(D) [Synthetic minor restriction to avoid major modification status and PSD review]	<p>Fugitive particulate emissions (PE) shall not exceed 0.008 ton as a rolling, 12-month summation.</p> <p>Fugitive PM₁₀ emissions shall not exceed 0.008 ton as a rolling, 12-month summation.</p> <p>Fugitive PM_{2.5} emissions shall not exceed 0.008 ton as a rolling, 12-month summation.</p> <p>Stack PE/PM₁₀/PM_{2.5} from Cartridge Filter D, controlling emissions unit P908, shall not exceed 0.56 ton as a rolling, 12-month summation.</p> <p>See b)(2)d., b)(2)e., c)(1), and c)(2)</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		below.
d.	OAC rule 3745-17-07(B) OAC rule 3745-17-08(B)	See b)(2)c. below.
e.	OAC rule 3745-17-11(B)(1)	<p>PE from any stack serving this emissions unit shall not exceed 0.551 lb/hr.</p> <p>The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3), until U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05.</p>
f.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
g.	OAC rule 3745-31-05(E) [Voluntary restriction to show compliance with a 90% capture efficiency]	No visible emissions of fugitive PE from the building egress points.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 emissions 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 revision 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 OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

(Authority for term: OAC rule 3745-31-05(A))

- 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 uncontrolled potential to emit for the particulate emissions is less than 10 TPY.

(Authority for term: OAC rule 3745-31-05(A))



- c. This facility is not subject to OAC rule 3745-17-07 or OAC rule 3745-17-08 because this facility is located in Coshocton Township which is not identified as an Appendix A area pursuant to OAC rule 3745-17-08.

(Authority for term: OAC rule 3745-17-07 and OAC rule 3745-17-08)

- d. The emissions from this emissions unit (P908) shall be vented to a baghouse (cartridge filter D) at all times the emissions unit is in operation.

(Authority for term: OAC rule 3745-31-05(A), OAC rule 3745-31-05(D))

- e. For purposes of securing federally enforceable terms to avoid federal PSD, the following is needed:

- i. This emissions unit shall be controlled with a baghouse with a capture efficiency of 90% an outlet loading not to exceed 0.0075 gr/dscf of PE/PM₁₀/PM_{2.5}.

(Authority for term: OAC rule 3745-31-05(D))

c) Operational Restrictions

- (1) The permittee has requested a federally enforceable limitation on the maximum annual throughput of electrode for this emissions unit in order to restrict the federally enforceable potential to emit to avoid major modification status for PE/PM₁₀/PM_{2.5}. The maximum annual throughput of electrode for this emissions unit shall not exceed 19.5 tons of electrode, based upon a rolling, 12-month summation of the throughput.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the throughput levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Throughput (tons)
1	2.46
1-2	4.91
1-3	7.37
1-4	9.82
1-5	12.28
1-6	14.73
1-7	17.19
1-8	19.5
1-9	19.5



1-10	19.5
1-11	19.5
1-12	19.5

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

(Authority for term: OAC rule 3745-31-05(D))

- (2) The permittee shall properly install, operate, and maintain the control equipment when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The control equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

(Authority for term: OAC rule 3745-31-05(A))

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
- a. the throughput of electrode, in tons, for each month;
 - b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of electrode, in tons;
 - c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of electrode, in tons, for each calendar month.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the operating hours for Cartridge Filter D.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the monthly fugitive emissions of PE, PM₁₀, and PM_{2.5} from this emissions unit calculated in accordance with the following equation:

$$\text{Fugitive PE/PM}_{10}\text{/PM}_{2.5} \text{ (tons/month)} = (\text{actual throughput of electrode (as recorded (d)(1)a.)}) * (7.80 * \text{lb PE/ton of poles}) * (1 - \text{capture efficiency (0.90)})$$

* AP-42 Table 12.19.-1: Gas metal arc (GMAW) ERNiCrMo wire. (NiCor-55 wire)

- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of fugitive emissions of PE, PM₁₀ and PM_{2.5} from this emissions unit;



- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative fugitive emissions of PE, PM₁₀ and PM_{2.5} for each calendar month for this emissions unit.

(Authority for term: OAC rule 3745-31-05(D))

- (4) The permittee shall maintain monthly records of the following information:
 - a. the monthly stack emissions of PE, PM₁₀, and PM_{2.5} from this emissions unit calculated in accordance with the following equation:
$$\text{Stack PE/PM}_{10}/\text{PM}_{2.5} \text{ (tons/month)} = (\text{actual operating hours for Cartridge Filter D}) * (0.0075 \text{ gr/dscf}) * (2,000 \text{ acfm}) * (1\text{lb} / 7,000 \text{ gr}) * (60 \text{ min/hr})$$
 - b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of stack emissions of PE, PM₁₀ and PM_{2.5} from this emissions unit;
 - c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative stack emissions of PE, PM₁₀ and PM_{2.5} for each calendar month from this emissions unit.

(Authority for term: OAC rule 3745-31-05(D))

- (5) The permittee shall properly install, 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 weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

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.

The acceptable range for the pressure drop across the baghouse is 1 to 10 inches of water.

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 appropriate Ohio EPA District Office or local air agency. 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 a minor permit modification.

(Authority for term: OAC rule 3745-31-05(A))

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify:
 - a. all exceedances of the rolling, 12-month limitation on the throughput of electrode for this emissions unit;
 - b. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative throughput of electrode for this emissions unit; and,
 - c. all exceedances of the rolling, 12-month limitations on PE/PM₁₀/PM_{2.5} found in b)(1)c. above.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(D))

- (2) The permittee shall submit quarterly reports that identify:
- 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 range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - 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 "(2)a." (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "(2)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 "(2)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.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(A))

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:



a. Design Efficiency Standard:

This emissions unit shall be controlled with a baghouse with a capture efficiency of 90% an outlet loading not to exceed 0.0075 gr/dscf of PE/PM₁₀/PM_{2.5}.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

b. Emissions Limitation:

Fugitive PE shall not exceed 0.008 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

c. Emissions Limitation:

Fugitive PM₁₀ emissions shall not exceed 0.008 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

d. Emissions Limitation:

Fugitive PM_{2.5} emissions shall not exceed 0.008 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

e. Emissions Limitation:

Stack PE/PM₁₀/PM_{2.5} from Cartridge Filter D, controlling emissions unit P908, shall not exceed 0.56 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(4) above.

f. Emissions Limitation:

PE from any stack serving this emissions unit shall not exceed 0.551 lb/hr.



Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

g. Emissions Limitation:

Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

h. Emissions Limitation:

No visible emissions of fugitive PE from the building egress points.

Applicable Compliance Method

Visible particulate emissions shall be determined according to USEPA Method 22. See f)(2).

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and mass emission limitation for PE/PM₁₀/PM_{2.5}.

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

PE, Methods 1-5 found in 40 CFR Part 60, Appendix A

PM₁₀, Method 201A found in 40 CFR Part 51, Appendix M

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

d. The capture efficiency shall be determined using Method 22 for all egress points of the enclosure (building) or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)



- e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install (PTI) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.



9. P909, Grit Wheel Blast

Operations, Property and/or Equipment Description:

Grit wheel blast with a maximum hourly throughput of 0.03 tons of grit per hour and a maximum annual throughput limitation of 180 tons of grit per rolling 12-month period; Controlled by Baghouse E with a 99.5% capture efficiency, an outlet grain loading of 0.0075 gr/dscf and an air flow of 8,000 acfm.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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 11/30/2001	The emissions limitation established pursuant to this rule is equivalent to the emissions limitation established pursuant to OAC rule 3745-31-05(D). See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006	See b)(2)b. below.
c.	OAC rule 3745-31-05(D) [Synthetic minor restriction to avoid major modification status and PSD review]	Fugitive particulate emissions (PE) shall not exceed 0.009 ton as a rolling, 12-month summation. Fugitive PM ₁₀ emissions shall not exceed 0.005 ton as a rolling, 12-month summation. Fugitive PM _{2.5} emissions shall not exceed 0.001 ton as a rolling, 12-month summation. Stack PE/PM ₁₀ /PM _{2.5} from Baghouse E, controlling emissions unit P909, shall not exceed 2.25 tons as a rolling, 12-month summation. See b)(2)d., b)(2)e., c)(1), and c)(2)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		below.
d.	OAC rule 3745-17-07(B) OAC rule 3745-17-08(B)	See b)(2)c. below.
e.	OAC rule 3745-17-11(B)(1)	<p>PE from any stack serving this emissions unit shall not exceed 0.551 lb/hr.</p> <p>The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3), until U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05.</p>
f.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
g.	OAC rule 3745-31-05(E) [Voluntary restriction to show compliance with a 90% capture efficiency]	No visible emissions of fugitive PE from the building egress points.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 emissions 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 revision 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 OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

(Authority for term: OAC rule 3745-31-05(A))

- 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 uncontrolled potential to emit for the particulate emissions is less than 10 TPY.

(Authority for term: OAC rule 3745-31-05(A))



- c. This facility is not subject to OAC rule 3745-17-07 or OAC rule 3745-17-08 because this facility is located in Coshocton Township which is not identified as an Appendix A area pursuant to OAC rule 3745-17-08.

(Authority for term: OAC rule 3745-17-07 and OAC rule 3745-17-08)

- d. The emissions from this emissions unit (P909) shall be vented to a baghouse (baghouse E) at all times the emissions unit is in operation.

(Authority for term: OAC rule 3745-31-05(A), OAC rule 3745-31-05(D))

- e. For purposes of securing federally enforceable terms to avoid federal PSD, the following is needed:

- i. This emissions unit shall be controlled with a baghouse with a capture efficiency of 99.5% an outlet loading not to exceed 0.0075 gr/dscf of PE/PM₁₀/PM_{2.5}.

(Authority for term: OAC rule 3745-31-05(D))

c) Operational Restrictions

- (1) The permittee has requested a federally enforceable limitation on the maximum annual throughput of grit for this emissions unit in order to restrict the federally enforceable potential to emit to avoid major modification status for PE/PM₁₀/PM_{2.5}. The maximum annual throughput of grit for this emissions unit shall not exceed 180 tons of grit, based upon a rolling, 12-month summation of the throughput.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the throughput levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Throughput (tons)
1	22.32
1-2	44.64
1-3	66.96
1-4	89.28
1-5	111.60
1-6	133.92
1-7	156.24
1-8	178.56
1-9	180



1-10	180
1-11	180
1-12	180

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

(Authority for term: OAC rule 3745-31-05(D))

- (2) The permittee shall properly install, operate, and maintain the control equipment when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The control equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

(Authority for term: OAC rule 3745-31-05(A))

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the throughput of grit, in tons, for each month;
 - b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of grit, in tons;
 - c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of grit, in tons, for each calendar month.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the operating hours for Baghouse E.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the monthly fugitive emissions of PE, PM₁₀, and PM_{2.5} from this emissions unit calculated in accordance with the following equations:

$$\text{Fugitive PE (tons/month)} = (\text{actual throughput of grit (as recorded (d)(1)a.)}) \times (0.0100 \times \text{lb PE/ton of poles}) \times (1 - \text{capture efficiency (0.995\%)})$$

$$\text{Fugitive PM}_{10} \text{ (tons/month)} = (\text{actual throughput of grit (as recorded (d)(1)a.)}) \times (0.0051 \times \text{lb PE/(on of poles)}) \times (1 - \text{capture efficiency (0.995\%)})$$



Fugitive PM_{2.5} (tons/month) = (actual throughput of grit (as recorded (d)(1)a.))*(0.0015**lb PE/(on of poles))*(1-capture efficiency (0.995%))

* AP-42 Ch.13.2.6 "Abrasive Blasting" background document Table 4.2 (grit)

** EPA PM Calculator SCC 30903088

- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of fugitive emissions of PE, PM₁₀ and PM_{2.5} from this emissions unit;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative fugitive emissions of PE, PM₁₀ and PM_{2.5} for each calendar month for this emissions unit.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the monthly stack emissions of PE, PM₁₀, and PM_{2.5} from this emissions unit calculated in accordance with the following equation:

Stack PE/PM₁₀/PM_{2.5} (tons/month) = (actual operating hours for Baghouse E) * (0.0075 gr/dscf) * (8,000 acfm) * (1lb / 7,000 gr) * (60 min/hr)

- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of stack emissions of PE, PM₁₀ and PM_{2.5} from this emissions unit;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative stack emissions of PE, PM₁₀ and PM_{2.5} for each calendar month from this emissions unit.

(Authority for term: OAC rule 3745-31-05(D))

(5) The permittee shall properly install, 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 weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

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.

The acceptable range for the pressure drop across the baghouse is 1 to 10 inches of water.

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 appropriate Ohio EPA District Office or local air agency. 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 a minor permit modification.

(Authority for term: OAC rule 3745-31-05(A))



e) Reporting Requirements

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

- a. all exceedances of the rolling, 12-month limitation on the throughput of grit for this emissions unit;
- b. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative throughput of grit for this emissions unit; and
- c. all exceedances of the rolling, 12-month limitation of PE/PM₁₀/PM_{2.5} found in b)(1)c. above.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(D))

(2) The permittee shall submit quarterly reports that identify:

- 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 range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
- 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 "(2)a." (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in "(2)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 "(2)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.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(A))

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Design Efficiency Standard:

This emissions unit shall be controlled with a baghouse with a capture efficiency of 99.5% an outlet loading not to exceed 0.0075 gr/dscf of PE/PM₁₀/PM_{2.5}.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

b. Emissions Limitation:

Fugitive PE shall not exceed 0.009 ton as a year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

c. Emissions Limitation:

Fugitive PM₁₀ emissions shall not exceed 0.005 ton as a year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

d. Emissions Limitation:

Fugitive PM_{2.5} emissions shall not exceed 0.001 ton as a year as a rolling, 12-month summation.



Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

e. Emissions Limitation:

Stack PE/PM₁₀/PM_{2.5} from Baghouse E, controlling emissions unit P909, shall not exceed 2.25 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(4) above.

f. Emissions Limitation:

PE from any stack serving this emissions unit shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

g. Emissions Limitation:

Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

h. Emissions Limitation:

No visible emissions of fugitive PE from the building egress points.

Applicable Compliance Method

Visible particulate emissions shall be determined according to USEPA Method 22. See f)(2).

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.



- b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and mass emission limitation for PE/PM₁₀/PM_{2.5}.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

PE, Methods 1-5 found in 40 CFR Part 60, Appendix A

PM₁₀, Method 201A found in 40 CFR Part 51, Appendix M

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- d. The capture efficiency shall be determined using Method 22 for all egress points of the enclosure (building) or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
- e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the



appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install (PTI) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.



10. P910, Zinc Arc Spray

Operations, Property and/or Equipment Description:

Zinc arc spray, including zinc wire melting (uncontrolled), with a maximum hourly throughput of 0.228 tons of zinc wire per hour and a maximum annual throughput limitation of 975 tons of zinc wire per rolling 12-month period; Zinc arc spray (not wire melting) is controlled by Filter F with a 99.5% capture efficiency, an outlet grain loading of 0.0050 gr/dscf and an air flow of 12,000 acfm.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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 11/30/2001	The emissions limitation established pursuant to this rule is equivalent to the emissions limitation established pursuant to OAC rule 3745-31-05(D). See b)(2)a. below.
b.	OAC rule 3745-31-05(C), as effective 12/01/2006	See b)(2)b. below.
c.	OAC rule 3745-31-05(D) [Synthetic minor restriction to avoid major modification status and PSD review, and BAT for PE/PM ₁₀ /PM _{2.5}]	Fugitive particulate emissions (PE) /PM ₁₀ /PM _{2.5} shall not exceed 1.95 tons as a rolling, 12-month summation. Stack PE/PM ₁₀ /PM _{2.5} from Filter F, controlling the zinc arc spray, shall not exceed 2.25 tons as a rolling, 12-month summation. See b)(2)d., b)(2)e., c)(1), and c)(2) below.
d.	OAC rule 3745-17-07(B) OAC rule 3745-17-08(B)	See b)(2)c. below.
e.	OAC rule 3745-17-11(B)(1)	PE from any stack serving this emissions unit shall not exceed 1.52 lbs/hr.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3), until U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05.
f.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
g.	OAC rule 3745-31-05(E) [Voluntary restriction to show compliance with a 90% capture efficiency]	No visible emissions of fugitive PE from the building egress points.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 emissions 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 revision 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 OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

(Authority for term: OAC rule 3745-31-05(A))

- 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.

Permit-to-install P0115154 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. Install a filter with a 99.5% capture efficiency and a 99% control efficiency;
- ii. PE/PM₁₀/PM_{2.5} from Filter F, controlling emissions unit P910, and fugitive PE combined shall not exceed 4.21 tons as a rolling, 12-month summation;

(Authority for term: OAC rule 3745-31-05(A))



- c. This facility is not subject to OAC rule 3745-17-07 or OAC rule 3745-17-08 because this facility is located in Coshocton Township which is not identified as an Appendix A area pursuant to OAC rule 3745-17-08.

(Authority for term: OAC rule 3745-17-07 and OAC rule 3745-17-08)

- d. The emissions from this emissions unit (P910) shall be vented to a baghouse (Filter F) at all times the emissions unit is in operation.

(Authority for term: OAC rule 3745-31-05(A), OAC rule 3745-31-05(D))

- e. For purposes of securing federally enforceable terms to avoid federal PSD, the following is needed:

- i. This emissions unit shall be controlled with a baghouse with a capture efficiency of 99.5% an outlet loading not to exceed 0.005 gr/dscf of PE/PM₁₀/PM_{2.5}.

(Authority for term: OAC rule 3745-31-05(D))

c) Operational Restrictions

- (1) The permittee has requested a federally enforceable limitation on the maximum annual throughput of zinc wire for this emissions unit in order to restrict the federally enforceable potential to emit to avoid major modification status for PE/PM₁₀/PM_{2.5}. The maximum annual throughput for this emissions unit shall not exceed 975 tons of zinc wire, based upon a rolling, 12-month summation of the throughput.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the throughput levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Throughput (tons)
1	169.63
1-2	339.26
1-3	508.89
1-4	678.52
1-5	848.15
1-6	975
1-7	975
1-8	975
1-9	975



1-10	975
1-11	975
1-12	975

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

(Authority for term: OAC rule 3745-31-05(D))

- (2) The permittee shall properly install, operate, and maintain the control equipment when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The control equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer’s recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

(Authority for term: OAC rule 3745-31-05(A))

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the throughput of zinc wire, in tons, for each month;
 - b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of zinc wire, in tons;
 - c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of zinc wire, in tons, for each calendar month.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the operating hours for Filter F.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the monthly fugitive emissions of PE, PM₁₀, and PM_{2.5} from this emissions unit calculated in accordance to the following equation:

$$\text{Fugitive Emissions (tons/month)} = [(\text{actual throughput of zinc wire (as recorded (d)(1)a.)}) * (0.005 \text{ (lb PE/PM}_{10}\text{/PM}_{2.5}\text{/ton of poles)}) / (2,000 \text{ lb/ton})] + [(\text{actual throughput of zinc wire (as recorded (d)(1)a.)}) * (2,000 \text{ (lb PE/PM}_{10}\text{/PM}_{2.5}\text{/ton)}) * (1 - \text{Transfer Efficiency}(0.60)) \times (1 - \text{Capture Efficiency}(0.995)) / (2,000 \text{ lb/ton})]$$

* WebFireScc 3-04-008-70: All particles are less than 2.5 micron per “Ultrafine Particles Emitted by Flame and Electrode Arc Guns” D. Bemer et.al.



- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of fugitive emissions of PE, PM₁₀ and PM_{2.5} from this emissions unit;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative fugitive emissions of PE, PM₁₀ and PM_{2.5} for each calendar month for this emissions unit.

(Authority for term: OAC rule 3745-31-05(D))

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

- a. the monthly stack emissions of PE, PM₁₀, and PM_{2.5} from this emissions unit calculated in accordance with the following equation:

$$\text{Stack PE/PM}_{10}\text{/PM}_{2.5} \text{ (tons/month)} = (\text{actual operating hours for Filter F} * (0.0050 \text{ gr/dscf}) * (12,000 \text{ acfm}) * (1\text{lb} / 7,000 \text{ gr}) * (60 \text{ min/hr}))$$

- b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of stack emissions of PE, PM₁₀ and PM_{2.5} from this emissions unit;
- c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative stack emissions of PE, PM₁₀ and PM_{2.5} for each calendar month from this emissions unit.

(Authority for term: OAC rule 3745-31-05(D))

- (5) The permittee shall properly install, 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 weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

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.

The acceptable range for the pressure drop across the baghouse is 1 to 10 inches of water.

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 appropriate Ohio EPA District Office or local air agency. 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 a minor permit modification.

(Authority for term: OAC rule 3745-31-05(A))

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify:
 - a. all exceedances of the rolling, 12-month limitation on the throughput of zinc wire for this emissions unit;
 - b. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative throughput of zinc wire for this emissions unit; and,
 - c. all exceedances of the rolling, 12-month limitation of PE/PM₁₀/PM_{2.5} found in b)(1)c. above.



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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(D))

- (2) The permittee shall submit quarterly reports that identify:
- 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 range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - 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 "(2)a." (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "(2)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 "(2)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.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(A))

- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:



a. Design Efficiency Standard:

This emissions unit shall be controlled with a baghouse with a capture efficiency of 99.5% an outlet loading not to exceed 0.005 gr/dscf of PE/PM₁₀/PM_{2.5}.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

b. Emissions Limitation:

Fugitive PE/PM₁₀/PM_{2.5} shall not exceed 1.95 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(3) above.

c. Emissions Limitation:

Stack PE/PM₁₀/PM_{2.5} from Filter F, controlling the zinc arc spray, shall not exceed 2.25 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the record keeping requirements in d)(4) above.

d. Emissions Limitation:

PE from any stack serving this emissions unit shall not exceed 1.52 lbs/hr.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined with the testing required in f)(2) below.

e. Emissions Limitation:

Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

f. Emissions Limitation:

No visible emissions of fugitive PE from the building egress points.



Applicable Compliance Method

Visible particulate emissions shall be determined according to USEPA Method 22. See f)(2).

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and mass emission limitation for PE/PM₁₀/PM_{2.5}.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

PE, Methods 1-5 found in 40 CFR Part 60, Appendix A

PM₁₀, Method 201A found in 40 CFR Part 51, Appendix M

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The capture efficiency shall be determined using Method 22 for all egress points of the enclosure (building) or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be



conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

- (1) None.



11. R008, Topcoat Application

Operations, Property and/or Equipment Description:

Topcoat application process with a maximum hourly throughput of 35 gallons per hour of coating and a maximum annual throughput limitation of 108,000 gallons of coating and 250 gallons of cleanup (using exempt solvent only) per rolling 12-month period; controlled by a dry particulate filter with a 100% capture and 99.87% control; includes a 9 million BTU per hour dryer (uncontrolled) with an annual limitation of 54,000 million BTU per rolling 12-month period.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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.	ORC 3704.03(T), OAC rule 3745-31-05(A)(3)	The VOC emissions limitation established pursuant to this rule is equivalent to the emissions limitation established pursuant to OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	The NO _x and CO emissions limitation established pursuant to this rule is equivalent to the emissions limitation established pursuant to OAC rule 3745-31-05(D). Install a dry particulate filter with a 100% capture efficiency and a 99.87% control efficiency. See b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006	See b)(2)b. below.
d.	OAC rule 3745-31-05(C), as effective 12/01/2006	See b)(2)c. below.
e.	OAC rule 3745-31-05(D) [Synthetic minor restriction to avoid major modification status and PSD review, and to avoid BAT for PE/PM ₁₀ /PM _{2.5}]	Volatile organic compound (VOC) emissions shall not exceed 36.33 tons as a rolling, 12-month summation. Nitrogen Oxide (NO _x) emissions shall not



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 2.7 tons as a rolling, 12-month summation. Carbon monoxide (CO) emissions shall not exceed 2.27 tons as a rolling, 12-month summation. Particulate emissions (PE)/PM ₁₀ /PM _{2.5} shall not exceed 0.26 ton as a rolling 12-month summation. See c)(1), c)(2), c)(5) and c)(6) below.
f.	OAC rule 3745-21-09(U)(1)(d)	The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 pounds per gallon, as applied, excluding water and exempt solvents for the coatings dried at temperatures not to exceed 200 degrees Fahrenheit.
g.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
h.	OAC rule 3745-17-11(C)	See c)(3) below.
i.	OAC rule 3745-17-10(B)(1) and (B)(4)	PE shall not exceed 0.02 lb/mmBtu of actual heat input.
j.	OAC rule 3745-31-05(E) [Voluntary restriction to show compliance with a 90% capture efficiency]	No visible emissions of fugitive PE from the building egress points.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 regulation for NAAQS pollutant emissions 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 revision 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 OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

(Authority for term: OAC rule 3745-31-05(A))



- 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 of OAC rule 3745-31-05(A)(3) do not apply to the NO_x, CO, or SO₂ emissions from this air contaminant source since the uncontrolled potential to emit for NO_x, CO, and SO₂ is less than 10 tons per year.

(Authority for term: OAC rule 3745-31-05(A))

- c. This rule paragraph applies once U.S. EPA approved the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP

Permit-to-install P0115154 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. Topcoat throughput shall not exceed 108,000 gallons of coating; and
- ii. Coating operations shall be vented to a dry particulate filter with 100% capture efficiency and 99.87% control efficiency.
- iii. PE/PM₁₀/PM_{2.5} emissions shall not exceed 0.26 ton per year.

(Authority for term: OAC rule 3745-31-05(C))

c) Operational Restrictions

- (1) The permittee has requested a federally enforceable limitation on the maximum annual throughput of topcoat for this emissions unit in order to restrict the federally enforceable potential to emit to avoid major modification status for PE/PM₁₀/PM_{2.5}. The maximum annual throughput for this emissions unit shall not exceed 108,000 gallons of topcoat, based upon a rolling, 12-month summation of the throughput.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the throughput levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Throughput (gallons)
1	26,040
1-2	52,080
1-3	78,120
1-4	104,160
1-5	108,000



1-6	108,000
1-7	108,000
1-8	108,000
1-9	108,000
1-10	108,000
1-11	108,000
1-12	108,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

(Authority for term: OAC rule 3745-31-05(D))

- (2) The permittee has requested a federally enforceable limitation on the maximum annual input of natural gas fuel of 54,000 million BTU for this emissions unit in order to restrict the federally enforceable potential to emit to avoid major modification status for PE/PM₁₀/PM_{2.5}. The maximum annual input for this emissions unit shall not exceed 54,000 million BTU, based upon a rolling, 12-month summation of the throughput.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the throughput levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Heat Input (MMBtu)
1	6,696
1-2	13,392
1-3	20,088
1-4	26,784
1-5	33,480
1-6	40,176
1-7	46,872
1-8	53,568
1-9	54,000
1-10	54,000



1-11 54,000

1-12 54,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual throughput limitation shall be based upon a rolling, 12-month summation of the throughput.

(Authority for term: OAC rule 3745-31-05(D))

- (3) The permittee shall install and operate a dry particulate filter for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(Authority for term: OAC rule 3745-17-11(C)(1))

- (4) In the event the dry particulate filter is not operating in accordance with the manufacturer’s recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(Authority for term: OAC rule 3745-17-11(C)(2)(e))

- (5) The permittee shall only burn natural gas in the drying oven.

(Authority for term: OAC rule 3745-31-05(A) and OAC rule 3745-31-05(D))

- (6) The VOC content of coatings shall not exceed 0.67 lb/gallon of coating, as applied.

*(Authority for term: OAC rule 3745-31-05(D))*Monitoring and/or

d) Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the coating line:
 - a. the name, identification number and type (for example, clear coat subject to OAC rule 3745-21-09(U)(1)(a)) of each coating applied;
 - b. the volume, in gallons, of each coating applied;
 - c. the VOC content, in pounds per gallon, of each coating, as applied (including any additives or thinners, if applicable);
 - d. the VOC emissions from coating (VOC), in tons of VOC per month calculated as follows:

$$VOC \left(\frac{tons}{month} \right) = \frac{\sum_{i=1}^n (G \times C)}{2,000 \frac{lbs}{ton}}$$



Where:

G = volume of each coating applied, in gallons, as recorded in d)(1)b. above;

C = VOC content of each coating, as applied, in pounds per gallon, as recorded in d)(1)c. above; and,

n = total number of coatings employed during the month.

- e. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of topcoat, in gallons;
- f. also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of topcoat, in gallons, for each calendar month;
- g. the maximum heat input of the drying oven, in million BTU, for each month;
- h. beginning after the first 12 calendar months of operation, the rolling 12-month summation of the maximum heat input of the drying oven, in million BTU;
- i. also during the first 12 calendar months of operation, the permittee shall record the cumulative maximum heat input of the drying oven, in million BTU, for each calendar month.
- j. the monthly emissions of PE, PM₁₀, PM_{2.5}, NO_x, CO, and VOC emissions from this emissions unit;
- k. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of PE, PM₁₀ and PM_{2.5} emissions from this emissions unit;
- l. also, during the first 12 calendar months of operation, the permittee shall record the cumulative emissions of PE, PM₁₀ and PM_{2.5} for each calendar month for this emissions unit.

(Authority for term: ORC 3704.03(T), OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(D))

- (2) The permittee must collect and record the following information each day for the coating line to demonstrate compliance with the coating VOC content limitations by means of a daily volume-weighted average VOC content:
 - a. the name and identification number of each coating, as applied;
 - b. the mass of VOC per volume of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and,
 - c. the daily volume-weighted average VOC content of all coatings, as applied calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for C_{VOC,2}, as follows:



$$(C_{VOC,2})_A = \frac{\sum_{i=1}^n C_{VOC,2i} LC_i (V_{si} + V_{voci})}{\sum_{i=1}^n LC_i (V_{si} + V_{voci})}$$

Where:

$(C_{VOC,2})_A$ is the daily volume-weighted average VOC content of all coatings, as applied; and

$C_{VOC,2}$ is the VOC content of pounds of VOC per gallon of coating excluding water and exempt solvents calculated as follows:

$$C_{VOC,2} = (D_c)(W_{VOC}) / V_s + V_{VOC};$$

D_c = density of coating, in pounds of coating per gallon of coating;

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

V_s = the volume fraction of solids in coating, in gallons of solids per gallon of coating;

$$V_{VOC} = V_{VM} - V_W - V_{ES};$$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating;

W_W = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating;

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating;

V_W = volume fraction of water in coating, in gallon of water of coating;

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating;

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period "t";

L_C = liquid volume of coating employed during time period "t", in gallons of coating;

M_C = mass of coating employed during the time period "t", in pounds of coating,

i = subscript denoting a specific coating employed during time period "t";

n = total number of coatings employed during time period "t"; and,

t = time period specified for the weighted average VOC content is per day and not included in calculation.



(Authority for term: OAC rule 3745-21-09(B)(3) and OAC rule 3745-21-10 for OAC rule 3745-21-09(U))

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(Authority for term: OAC 3745-17-11(C)(2)(a))

- (4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(Authority for term: OAC rule 3745-17-11(C)(2)(c))

- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(Authority for term: OAC rule 3745-17-11(C)(2)(c))

- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(Authority for term: OAC rule 3745-17-11(C)(2)(d) and (f))

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.



(Authority for term: OAC rule 3745-17-11(C)(2)(e),(f) and (g) for OAC rule 3745-17-11(C)(1))

- (8) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(Authority for term: OAC rule 3745-31-05(A) and OAC rule 3745-31-05(D))

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify:
- a. all exceedances of the rolling, 12-month limitation on the throughput of topcoat for this emissions unit;
 - b. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative throughput of topcoat for this emissions unit;
 - c. all exceedances of the rolling, 12-month limitation on the throughput of cleanup for this emissions unit;
 - d. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative throughput of cleanup for this emissions unit;
 - e. all exceedances of the rolling, 12-month limitation on the maximum heat input of the drying oven for this emissions unit;
 - f. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative maximum heat input of the drying oven for this emissions unit;
 - g. all exceedances of the rolling, 12-month limitations on VOC, NO_x, CO, PE/PM₁₀/PM_{2.5} found in b)(1)e.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-31-05(D))

- (2) The permittee shall submit quarterly reports that identify:
- a. any daily record showing that the dry particulate filter was not in service or not operated according to manufacturer's recommendations (with any documented



modifications made by the permittee) when the emissions unit(s) was/were in operation.

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 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 the Director (the appropriate District Office or local air agency).

(Authority for term: OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C); and OAC rule 3745-31-05(A))

- (3) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing the application of a coating with greater than 3.5 pounds VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of each such record and it shall be sent to the appropriate District Office or local air agency within 45 days following the end of the calendar month during which the non-compliant coating was applied.

(Authority for term: OAC 3745-21-09(B)(3)(i))

- (4) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 day after the deviation occurs.

(Authority for term: OAC rule 3745-31-05(A) and OAC rule 3745-31-05(D))

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

VOC emissions shall not exceed 36.33 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation may be demonstrated through the recordkeeping required d)(1) above.

b. Emissions Limitation:

NO_x emissions shall not exceed 2.7 tons as a rolling, 12-month summation.



Applicable Compliance Method:

Compliance with this emissions limitation may be demonstrated through the recordkeeping required d)(1) above.

c. Emissions Limitation:

CO emissions shall not exceed 2.27 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation may be demonstrated through the recordkeeping required in d)(1) above.

d. Emissions Limitation:

PE/PM₁₀/PM_{2.5} emissions shall not exceed 0.26 tons as a rolling 12-month summation.

Applicable Compliance Method:

Compliance with this emissions limitation may be demonstrated through the recordkeeping required d)(1) above.

e. Emissions Limitation:

The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 pounds per gallon, as applied, excluding water and exempt solvents for the coatings dried at temperatures not to exceed 200 degrees Fahrenheit.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2) above.

f. Emissions Limitation:

Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

g. Emissions Limitation:

PE shall not exceed 0.02 lb/mmBtu of actual heat input.



Applicable Compliance Method:

Compliance with this emissions limitation can be shown by taking 7.6 lbs PE/mmscf from AP-42 Tale 1.4-2 (7/1998) divided by the heat content of natural gas (1,020 Btu/scf), as found in AP-42 Chapter 1.4.

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745 17 03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

h. Emissions Limitation:

No visible emissions of fugitive PE from the building egress points.

Applicable Compliance Method

Visible particulate emissions shall be determined according to USEPA Method 22. See f)(2).

- (2) The permittee shall conduct, or have conducted, emission testing for the dry particulate control device for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency limitation for PE/PM₁₀/PM_{2.5}.
 - c. The capture efficiency shall be determined using Method 22 for all egress points of the enclosure (building) or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these



conditions is justification for not accepting the test results as a demonstration of compliance.

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install (PTI) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.