



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

6/2/2015

Certified Mail

John Wenneman
Advance Bronze, Inc.
139 Ohio St
PO Box 280
LODI, OH 44254

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1652040001
Permit Number: P0118597
Permit Type: Renewal
County: Medina

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. 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 PTIO 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 Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: ARAQMD



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Advance Bronze, Inc.**

Facility ID:	1652040001
Permit Number:	P0118597
Permit Type:	Renewal
Issued:	6/2/2015
Effective:	6/2/2015
Expiration:	6/29/2019



**Division of Air Pollution Control
Permit-to-Install and Operate**

for
Advance Bronze, Inc.

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Final Permit-to-Install and Operate
Advance Bronze, Inc.
Permit Number: P0118597
Facility ID: 1652040001
Effective Date: 6/2/2015

Authorization

Facility ID: 1652040001
Application Number(s): A0053013
Permit Number: P0118597
Permit Description: PTIO renewal permit for three casting furnaces.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 6/2/2015
Effective Date: 6/2/2015
Expiration Date: 6/29/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Advance Bronze, Inc.
151 BILLMAN STREET
Lodi, OH 44254

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

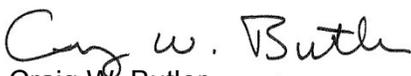
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0118597
 Permit Description: PTIO renewal permit for three casting furnaces.

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

Group Name: Bronze Melting Furnaces

Emissions Unit ID:	P003
Company Equipment ID:	Furnace 2
Superseded Permit Number:	16-02516
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	Furnace 3
Superseded Permit Number:	16-02516
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	Furnace 4
Superseded Permit Number:	16-02516
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
Advance Bronze, Inc.
Permit Number: P0118597
Facility ID: 1652040001
Effective Date: 6/2/2015

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



Final Permit-to-Install and Operate
Advance Bronze, Inc.
Permit Number: P0118597
Facility ID: 1652040001
Effective Date: 6/2/2015

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The Ohio EPA has determined that this facility may be applicable to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



Final Permit-to-Install and Operate
Advance Bronze, Inc.
Permit Number: P0118597
Facility ID: 1652040001
Effective Date: 6/2/2015

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Bronze Melting Furnaces: P003, P004, P005

EU ID	Operations, Property and/or Equipment Description
P003	1200 lbs/hour induction-type bronze melting furnace with power supply.
P004	1200 lbs/hour induction-type bronze melting furnace with power supply.
P005	1200 lbs/hour induction-type bronze melting furnace with power supply.

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

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

a. g)(1).

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

a. 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) PTI 16-02516	Lead (Pb) emissions shall not exceed 0.021 pound per hour and 0.092 ton per year combined for these emissions units. Particulate emissions (PE) shall not exceed 16.2 tons per year combined for these emissions units. See b)(2)a. through b)(2)d. and c)(1) through c)(3).
b.	Stack Particulate OAC rule 3745-17-11(B)(1)	Stack PE shall not exceed 3.70 pounds per hour combined for these emissions units. See b)(2)d. and b)(2)e.
c.	Stack Opacity OAC rule 3745-17-07(A)(1)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		provided by rule.
d.	Fugitive Opacity OAC rule 3745-17-07(B)(1)	Visible PE from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
e.	Fugitive Operational Restrictions OAC rule 3745-17-08(B)(3)	See b)(2)f.

(2) Additional Terms and Conditions

- a. In this permit, particulate emissions (PE) are being used as surrogate for both particulate matter 10 microns and less in diameter (PM₁₀) and particulate matter 2.5 microns and less in diameter (PM_{2.5}).
- b. The requirements of OAC rule 3745-31-05(A)(3) include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-07(B)(1), 3745-17-08(B)(3), and 3745-17-11(B)(1).
- c. The permittee shall properly install (or have properly installed), adjust, operate, and maintain a baghouse and associated equipment, as specified in the application, to adequately control PE and metal fume emissions, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- d. These emissions units meet the criteria for similar process units that are physically united, operationally united, or located in close proximity to each other. Thus, P003 through P005 are grouped together to establish the hourly and annual stack emission limitations.
- e. The hourly stack PE limitation for P003 through P005 was determined by assuming a maximum combined capacity of 1.8 tons per hour, multiplied by an uncontrolled emission factor of 10.3 pounds of PE per ton of metal charged. This yields an uncontrolled mass rate of emission (UMRE) of PE from P003 through P005, combined, of 18.5 pounds per hour, and from Curve P-1 of Figure II, a maximum allowable stack emission rate of 3.70 pounds of PE per hour, which is more stringent than the allowable emission rate from Table I.
- f. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from these emissions units shall meet the following requirements:
 - i. The collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and

- ii. The control equipment for these emissions units shall achieve an outlet emission rate of not greater than 0.03 grains of PE per dry standard cubic foot of exhaust gases or there shall be no visible PE (whichever is less stringent) from the exhaust stack of these emissions units.
- c) Operational Restrictions
- (1) The metal feedstock melted in the furnaces shall be limited to alloy ingots and to recycled materials, wire, scrap castings, turnings, and similar sources of copper or bronze that are free from excessive dirt, grease and oils.
 - (2) The permittee shall employ the baghouse serving these emissions units at all times any emissions unit is in operation.
 - (3) Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving these emissions units shall be maintained within the range of 2 to 8 inches of water, while the emissions units are in operation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall document any instance where any material not included in c)(1) above is charged to these emissions units.
 - (2) The permittee shall document when the baghouse serving these emissions units was not in service when the emissions units were in operation.
 - (3) The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse serving these emissions units, while the emissions units are in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
 - (4) Whenever the monitored value for the pressure drop deviates from the limit or range established by 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.
 - (5) 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 by the manufacturer, 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:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. 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.

- (6) 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 units. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.
- (7) The permittee shall perform daily checks, when the emissions units are in operation and when weather conditions allow, for any visible particulate emissions from the baghouse stack and any visible emissions of fugitive dust from the non-stack egress points (i.e., building windows, doors, roof monitors, etc.) serving these emissions units. The presence or absence of any visible emissions shall be noted daily in an operations log. If visible emissions are observed, the permittee shall also note the following in an operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions event; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(7)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions units). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions units continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual PER the following information concerning the operations of the baghouse during the 12-month reporting period for these emissions units:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the baghouse serving these emissions units was not in service when the emissions units were in operation;
 - c. each incident of deviation described in e)(3)a. where a prompt investigation was not conducted;
 - d. each incident of deviation described in e)(3)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 e)(3)a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements located in section d) above:
 - a. all instances where any material not included in c)(1) above was charged to these emissions units;

- b. all days during which any visible particulate emissions were observed from any stack;
 - c. all days during which any visible fugitive particulate emissions were observed from any non-stack egress point (i.e., building windows, doors, roof monitors, etc.); and
 - d. any corrective actions taken to minimize or eliminate the visible stack and/or fugitive particulate emissions.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible PE from any stack serving these emissions units shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 9.
 - b. Emission Limitation:

Visible emissions of fugitive dust from these emissions units shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 9 the procedures specified in OAC rule 3745-17-03(B)(3).
 - c. Emission Limitation:

The controlled emissions from the stack shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible emissions from the exhaust stack.

Applicable Compliance Method:

Compliance with the requirement for no visible particulate emissions from the exhaust stack, identified in this permit, shall be determined in accordance with U.S. EPA Method 22. If opting to comply with the outlet particulate emissions rate, compliance with the 0.030 grain of particulate emissions per dry standard

cubic foot of exhaust gases from the stack shall be determined in accordance with U.S. EPA Methods 1 through 5, as appropriate.

d. Emission Limitation:

Stack PE shall not exceed 3.70 pounds per hour and 16.2 tons per year combined for these emissions units.

Applicable Compliance Method:

If required, compliance with the hourly allowable PE emission limitation shall be determined by emissions testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

The ton per year emission limitation was developed by multiplying the short-term allowable PE limitation of 3.70lb/hr by the maximum annual operating time of 8,760 hours, and then dividing by 2,000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be demonstrated with the annual emission limitation.

e. Emissions Limitation:

Lead (Pb) emissions shall not exceed 0.021 pound per hour and 0.092 ton per year combined for these emissions units.

Applicable Compliance Method:

If required, compliance with the hourly allowable lead emission limitation shall be determined by emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 12.

- (2) Emissions units P003, P004, and P005 are also operationally united with emissions unit P006 (P0105043 effective 6/29/2009) and share a common stack. Therefore, for the purposes of emissions testing, the emission limitations found in this permit shall be combined with the applicable limitations for P006 to determine compliance for all four units.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in 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 permittees to apply for and obtain a new or modified permit to install 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 permit to install.