



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

6/18/2015

Certified Mail

Tim Brennan
Superior Forge & Steel Corporation
1820 McClain Road
Lima, OH 45804

Facility ID: 0302020300
Permit Number: P0118311
County: Allen

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Minor Permit Modification

Dear Permit Holder:

Enclosed is a final Ohio Environmental Protection Agency (EPA) Air Pollution Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it 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 Title V permit 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 regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office as indicated on page one of your permit.

Sincerely,



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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Northwest District Office



FINAL

**Division of Air Pollution Control
Title V Permit
for
Superior Forge & Steel Corporation**

Facility ID:	0302020300
Permit Number:	P0118311
Permit Type:	Minor Permit Modification
Issued:	6/18/2015
Effective:	6/18/2015
Expiration:	10/2/2017



Division of Air Pollution Control
Title V Permit
for
Superior Forge & Steel Corporation

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Final Title V Permit
Superior Forge & Steel Corporation
Permit Number: P0118311
Facility ID: 0302020300
Effective Date: 6/18/2015

Authorization

Facility ID: 0302020300
Facility Description: Steel Foundry
Application Number(s): A0052372
Permit Number: P0118311
Permit Description: Title V Minor Permit Modification to add recently-issued PTIs and to update rule applicability for emissions unit P002.
Permit Type: Minor Permit Modification
Issue Date: 6/18/2015
Effective Date: 6/18/2015
Expiration Date: 10/2/2017
Superseded Permit Number: P0115479

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Superior Forge & Steel Corporation
1820 McClain Road
Lima, OH 45804

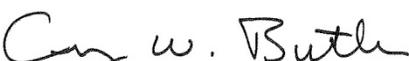
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Final Title V Permit
Superior Forge & Steel Corporation
Permit Number: P0118311
Facility ID: 0302020300
Effective Date:6/18/2015

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- 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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from

federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northwest District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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 reissuance, or modification, or for denial of a permit renewal application.
- 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 except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. 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, reopening 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.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
 - (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, Northwest 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.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.



- b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.

This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible 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 Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



30. Submitting Documents Required by this Permit

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 Ohio EPA DAPC, Northwest District Office, 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Final Title V Permit
Superior Forge & Steel Corporation
Permit Number: P0118311
Facility ID: 0302020300
Effective Date: 6/18/2015

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. There are no insignificant emissions units with applicable requirements at this facility.
3. Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions unit P002 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

[Authority for term: 40 CFR Part 64]



Final Title V Permit
Superior Forge & Steel Corporation
Permit Number: P0118311
Facility ID: 0302020300
Effective Date: 6/18/2015

C. Emissions Unit Terms and Conditions

1. P002, E-3 Electric Arc Furnace (EAF) - Melting

Operations, Property and/or Equipment Description:

electric arc melting furnace

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 3745-17-11(B)(1)	26.6 lbs particulate emissions (PE)/hr
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-18-06(E)	153.2 lbs of sulfur dioxide (SO ₂)/hr [See b)(2)a.]
d.	40 CFR, Part 63, Subpart YYYYYY (40 CFR 63.10680-63.10692) [This facility is considered to be an existing affected source pursuant to 40 CFR 63.10680(b)(1)]	The permittee shall not discharge or cause the discharge into the atmosphere particulate matter (PM) in excess of 0.0052 grain (gr) (PM) per dry standard cubic foot (dscf) of exhaust gases from the control device [63.10686(b)(1)] Visible particulate emissions from the shop, due solely to operation of the affected electric arc furnace, shall not exceed 6% opacity [63.10686(b)(2)] See b)(2)c.
e.	40 CFR 63.1-15 (40 CFR 63.10690)	Table 1 to Subpart YYYYYY of 40 CFR Part 63 – Applicability of General Provisions to Subpart YYYYYY shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
f.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(1) through d)(7), e)(1) and e)(2)

(2) Additional Terms and Conditions

- a. The actual SO₂ emissions from this emissions unit are assumed to be minor.
- b. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to 40 CFR, Part 63, Subpart YYYYYY.
- c. For the production of steel other than leaded steel, the permittee shall not charge to the furnace metallic scrap that contains scrap from motor vehicle bodies, engine blocks, oil filters, oily turnings, machine shop borings, transformers or capacitors containing polychlorinated biphenyls, lead-containing components, chlorinated plastics, or free organic liquids. For the production of leaded steel, the permittee shall not charge to the furnace metallic scrap that contains scrap from motor vehicle bodies, engine blocks, oil filters, oily turnings, machine shop borings, transformers or capacitors containing polychlorinated bi phenyls, lead-containing components, chlorinated plastics, or free organic liquids.

This restriction does not apply to any post-consumer engine blocks, post-consumer oil filters, or oily turnings that are processed or cleaned to the extent practicable such that the materials do not include lead components, chlorinated plastics, or free organic liquids. This restriction does not apply to motor vehicle scrap that is charged to recover the chromium or nickel content if the permittee meets the requirements in 40 CFR 63.10685(b)(3).

[40 CFR 63.10685(a)(2)]

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
 - a. The permittee shall record the pressure drop, in inches of water, across the baghouse on daily basis.
 - b. Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.



The permittee shall promptly investigate the cause of the deviation and shall maintain records of the following information for each investigation:

- i. the date and time the deviation began and the magnitude of the deviation at that time;
 - ii. the date(s) the investigation was conducted;
 - iii. the names of the personnel who conducted the investigation; and
 - iv. the findings and recommendations.
- c. 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.
- i. The permittee shall maintain records of the following information for each deviation when it was determined that corrective action was not necessary:
 - (a) the reasons corrective action was not necessary; and
 - (b) the date and time the deviation ended.
 - ii. The permittee shall maintain records of the following information for each deviation when corrective action was 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.
 - iii. 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.
- d. The acceptable range for the pressure drop across the baghouse is 1 to 10 inches of water.
- e. The range 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 range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range 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.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the baghouse controlling this emissions unit are the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations, and VE observations. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC 3745-77-07(C)(1) and 40 CFR Part 64]

- (3) Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:
 - a. checking the bags / filters for deterioration or degradation;
 - b. checking the cleaning system for proper operation; and
 - c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC 3745-77-07(C)(1) and 40 CFR Part 64]

- (4) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC 3745-77-07(C)(1) and 40 CFR Part 64]

- (5) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 3745-77-07(C)(1) and 40 CFR Part 64]

- (6) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:
- a. filter bags;
 - b. timing boards and solenoid coils (for blow down function);
 - c. diaphragms and diaphragm seal kits;
 - d. spare set of belts; and
 - e. spare bearings for blower motor.

[OAC 3745-77-07(C)(1) and 40 CFR Part 64]

- (7) The permittee shall perform daily checks, when the emissions unit is in operation, when the weather conditions allow and when melting operations occur during daylight hours for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

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

[OAC rule 3745-77-07(C)(1) and 40 CFR 64.7(d)]

- (8) The permittee shall install, operate and maintain a capture system that collects the emissions from each EAF (including charging, melting and tapping operations) and convey they collected emissions to a control device for the removal of particulate matter.

[40 CFR 63.10686(a)]

- (9) The permittee shall maintain records to demonstrate compliance with the requirements for the use of only restricted scrap in 40 CFR 63.10685(a)(2).

[40 CFR 63.10685(c)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
- a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (2) The permittee shall submit semiannual written reports that identify:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (3) The permittee shall submit semiannual compliance reports for the control of contaminants from scrap according to the requirements in 40 CFR 63.10(e). The report must clearly identify any deviation from the requirements of 40 CFR 63.10685(a)(2).

[40 CFR 63.10685(c)(3)]

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:

26.6 lbs PE/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing conducted in accordance with the methods in OAC rule 3745-17-03(B)(10). [An actual emission rate of 4.76 lbs/hr was demonstrated on 2/25/2008]

[OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined by visible emissions evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

153.2 lbs SO₂/hr

Applicable Compliance Method:

Compliance with the hourly allowable SO₂ emission limitation shall be determined by multiplying the maximum hourly process weight rate of 16.3 tons by the emission factor of 0.24 lb SO₂/ton from the FIRES database, version 6.24 (SCC code 3-04-007-01).

If required, the permittee shall demonstrate compliance with the SO₂ emission limitation based on the results of emission testing conducted in accordance with Methods 1 -4 of and 6 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]



d. Emission Limitation:

The permittee shall not discharge or cause the discharge into the atmosphere particulate matter (PM) in excess of 0.0052 gr PM/dscf of exhaust gases from the control device

Applicable Compliance Method:

The permittee shall demonstrated compliance with the gr PM/dscf emission limitation in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

[40 CFR 63.10686 and OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

Visible particulate emissions from the shop, due solely to operation of the affected electric arc furnace, shall not exceed 6% opacity [63.10686(b)(2)]

Applicable Compliance Method:

Compliance shall be determined by visible emissions evaluations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

[40 CFR 63.10686 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

2. P010, Selas Furnace with Quench (Annealing Bay)

Operations, Property and/or Equipment Description:

10.10 mmBtu/hr natural gas fired selas furnace with quench in annealing bay

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) [PTI P0118442, issued 2/13/2015]	0.99 lb nitrogen oxides (NO _x)/hr; 4.34 tons NO _x /yr 0.83 lb carbon monoxide (CO)/hr; 3.64 tons CO/yr 0.08lbparticulate emissions (PE)/hr; 0.33 ton PE/yr [See b)(2)e.] See b)(2)a.
b.	OAC rule 3745-17-11(B)(1)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-18-06(E)(2)	194.66 lbs sulfur dioxide (SO ₂)/hr [See b)(2)d.]

(2) Additional Terms and Conditions

a. The “Best Available Technology” (BAT) requirements have been determined to be the use of natural gas and compliance with the terms and conditions of this permit.

SO₂ and volatile organic compounds (VOC) emissions are considered to be negligible and will not be included as part of BAT.

b. The uncontrolled mass rate of particulate emissions (PE)* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition,



Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

* The burning of natural gas is the only source of PE from this emissions unit.

- c. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- d. The actual SO₂ emissions from this emissions unit are negligible because the combustion of natural gas is the only source of these emissions (the combustion of natural gas produces negligible amounts of SO₂ emissions).
- e. All PE is assumed to be particulate matter less than 10 microns in size (PM₁₀).

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

[PTI P0118442 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) 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.

[PTI P0118442 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) 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 days after the deviation occurs.

[PTI P0118442 and OAC rule 3745-77-07(C)(1)]

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 Limitations:

0.99 lb NO_x/hr; 4.34 tons NO_x/yr

Applicable Compliance Method:

The hourly emission limitation was established by using the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4



(7/98) of 100 lbs NO_x/10⁶scf for natural gas and dividing by a conversion factor of 1020 BTU/scf, then multiplying by a maximum input rate of 10.10 mmBtu/hr.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 7. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[PTI P0118442 and OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

0.83 lb CO/hr; 3.64 tons CO/yr

Applicable Compliance Method:

The hourly emission limitation was established by using the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (7/98) of 84 lbs CO/10⁶scf for natural gas and dividing by a conversion factor of 1020 BTU/scf, then multiplying by a maximum input rate of 10.10 mmBtu/hr.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 10. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[PTI P0118442 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

0.08lb PE/hr; 0.33 ton PE/yr

Applicable Compliance Method:

The hourly emission limitation was established by using the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (7/98) of 7.6 lbs PE/10⁶scf for natural gas and dividing by a conversion factor of 1020 BTU/scf, then multiplying by a maximum input rate of 10.10mmBtu/hr.



If required, compliance with the lb/mmBtu and the hourly emission limitation shall be determined by stack testing in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[PTI P0118442 and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

194.66 lbs SO₂/hr

Applicable Compliance Method:

This emission limit is based on the equation specified in OAC rule 3745-18-06(E)(2), applying a maximum process weight rate of 16.3 tons per hour.

Compliance with this hourly allowable SO₂ emission limitation shall be demonstrated as long as natural gas is the only fuel combusted in this emissions unit.

If required, compliance with the hourly emission limitation shall be determined by stack testing in accordance with OAC rule 3745-18-04(E)(1).

[PTI P0118442 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

3. P023, Foundry Furnace #65 (Annealing Bay)

Operations, Property and/or Equipment Description:

11.5 mmBtu/hr natural gas fired annealing furnace

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) [PTI P0118458, issued 2/13/2015]	1.13 lbs nitrogen oxides (NOx)/hr; 4.94 tons NOx/yr 0.95 lb carbon monoxide (CO)/hr; 4.15 tons CO/yr 0.09 lb particulate emissions (PE)/hr; 0.39 ton PE/yr [See b)(2)e.] See b)(2)a.
b.	OAC rule 3745-17-11(B)(1)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-18-06(E)(2)	194.66 lbs sulfur dioxide (SO2)/hr [See b)(2)d.]

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) has been determined to be the use of natural gas and compliance with the terms and conditions of this permit.

SO2 and volatile organic compounds (VOC) emissions are considered to be negligible and will not be included as part of BAT.

b. The uncontrolled mass rate of particulate emissions (PE)* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).



* The burning of natural gas is the only source of PE from this emissions unit.

- c. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- d. The actual SO₂ emissions from this emissions unit is negligible because the combustion of natural gas is the only source of these emissions (the combustion of natural gas produces negligible amounts of SO₂ emissions).
- e. All PE is assumed to be particulate matter less than 10 microns in size (PM₁₀).

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

[PTI P0118458 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) 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.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) 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 days after the deviation occurs.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

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 Limitations:

1.13 lbs NO_x/hr; 4.94 tons NO_x/yr

Applicable Compliance Method:

The hourly emission limitation was established by using the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (7/98) of 100 lbs NO_x/10⁶scf for natural gas and dividing by a conversion factor of 1020 BTU/scf, then multiplying by a maximum input rate of 11.5 mmBtu/hr.



If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 7. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

0.95 lb CO/hr; 4.15 tons CO/yr

Applicable Compliance Method:

The hourly emission limitation was established by using the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (7/98) of 84 lbs CO/10⁶scf for natural gas and dividing by a conversion factor of 1020 BTU/scf, then multiply by a maximum input rate of 11.5 mmBtu/hr.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 10. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

0.09 lb PE/hr; 0.39 ton PE/yr

Applicable Compliance Method:

The hourly emission limitation was established by using the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (7/98) of 7.6 lbs PE/10⁶scf for natural gas and dividing by a conversion factor of 1020 BTU/scf, then multiply by a maximum input rate of 11.5 mmBtu/hr.

If required, compliance with the lb/mmBtu and the hourly emission limitation shall be determined by stack testing in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.



The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

194.66 lbs SO₂/hr

Applicable Compliance Method:

This emission limit is based on the equation specified in OAC rule 3745-18-06(E)(2), applying a maximum process weight rate of 16.3 tons per hour.

Compliance with this hourly allowable SO₂ emission limitation shall be demonstrated as long as natural gas is the only fuel combusted in this emissions unit.

If required, compliance with the hourly emission limitation shall be determined by stack testing in accordance with Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

4. P028, Forge Furnace #124 (Forging Dept.)

Operations, Property and/or Equipment Description:

17.5 mmBtu/hr, natural gas-fired forge furnace; forge furnace #124

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 3745-17-11(B)(1)	See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-18-06(E)	259.3 lbs sulfur dioxide (SO ₂)/hr [See b)(2)c.]

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions (PE)* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

*The burning of natural gas is the only source of PE from this emissions unit.

b. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

c. The actual SO₂ emissions from this emissions unit are negligible because the combustion of natural gas is the only source of these emissions (the combustion of natural gas produces negligible amounts of SO₂ emissions).

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) 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.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) 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 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

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:

259.3 lbs SO₂/hr

Applicable Compliance Method:

Compliance with the hourly allowable SO₂ emission limitation shall be demonstrated as long as natural gas is the only fuel combusted in this emissions unit.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.

5. P029, Forge Furnace #125 (Forging Dept.)

Operations, Property and/or Equipment Description:

10 mmBtu/hr, natural gas-fired forge furnace; forge furnace #125

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 3745-17-11(B)(1)	See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-18-06(E)	541.3 lbs sulfur dioxide (SO ₂)/hr [See b)(2)c.]

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions (PE)* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

*The burning of natural gas is the only source of PE from this emissions unit.

b. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

c. The actual SO₂ emissions from this emissions unit are negligible because the combustion of natural gas is the only source of these emissions (the combustion of natural gas produces negligible amounts of SO₂ emissions).

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) 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.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) 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 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

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:

541.3 lbs SO₂/hr

Applicable Compliance Method:

Compliance with the hourly allowable SO₂ emission limitation shall be demonstrated as long as natural gas is the only fuel combusted in this emissions unit.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.

6. P030, Forge & Annealing Furnace #126 (Forging Dept.)

Operations, Property and/or Equipment Description:

10.5 mmBtu/hr natural gas fired forge and annealing furnace

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) [PTI P0118458, issued 2/13/2015]	1.03 lbs nitrogen oxides (NOx)/hr; 4.50 tons NOx/yr 0.86 lb carbon monoxide (CO)/hr; 3.79 tons CO/yr 0.08 lb particulate emissions (PE)/hr; 0.34 ton PE/yr [See b)(2)e.] See b)(2)a.
b.	OAC rule 3745-17-11(B)(1)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-18-06(E)(2)	194.66 lbs sulfur dioxide (SO2)/hr [See b)(2)d.]

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) has been determined to be the use of natural gas and compliance with the terms and conditions of this permit.

SO2 and volatile organic compounds (VOC) emissions are considered to be negligible and will not be included as part of BAT.

b. The uncontrolled mass rate of particulate emissions (PE)* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).



* The burning of natural gas is the only source of PE from this emissions unit.

- c. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- d. The actual SO₂ emissions from this emissions unit is negligible because the combustion of natural gas is the only source of these emissions (the combustion of natural gas produces negligible amounts of SO₂ emissions).
- e. All PE is assumed to be particulate matter less than 10 microns in size (PM₁₀).

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

[PTI P0118458 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) 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.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) 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 days after the deviation occurs.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

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 Limitations:

1.03 lbs NO_x/hr; 4.50 tons NO_x/yr

Applicable Compliance Method:

The hourly emission limitation was established by using the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (7/98) of 100 lbs NO_x/10⁶scf for natural gas and dividing by a conversion factor of 1020 BTU/scf, then multiplying by a maximum input rate of 10.5 mmBtu/hr.



If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 7. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

0.86 lb CO/hr; 3.79 tons CO/yr

Applicable Compliance Method:

The hourly emission limitation was established by using the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (7/98) of 84 lbs CO/10⁶scf for natural gas and dividing by a conversion factor of 1020 BTU/scf, then multiply by a maximum input rate of 10.5 mmBtu/hr.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 10. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

0.08lb PE/hr; 0.34 ton PE/yr

Applicable Compliance Method:

The hourly emission limitation was established by using the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (7/98) of 7.6 lbs PE/10⁶scf for natural gas and dividing by a conversion factor of 1020 BTU/scf, then multiply by a maximum input rate of 10.5 mmBtu/hr.

If required, compliance with the lb/mmBtu and the hourly emission limitation shall be determined by stack testing in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.



The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

194.66 lbs SO₂/hr

Applicable Compliance Method:

This emission limit is based on the equation specified in OAC rule 3745-18-06(E)(2), applying a maximum process weight rate of 16.3 tons per hour.

Compliance with this hourly allowable SO₂ emission limitation shall be demonstrated as long as natural gas is the only fuel combusted in this emissions unit.

If required, compliance with the hourly emission limitation shall be determined by stack testing in accordance with Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

7. P045, Foundry Furnace #54 (Annealing Bay)

Operations, Property and/or Equipment Description:

12.0 mmBtu/hr natural gas-fired annealing furnace

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) [PTI P0118458, issued 2/13/2015]	1.18 lbs nitrogen oxides (NOx)/hr; 5.15 tons NOx/yr 0.99 lb carbon monoxide (CO)/hr; 4.33 tons CO/yr 0.09 lb particulate emissions (PE)/hr; 0.39 ton PE/yr [See b)(2)e.] See b)(2)a.
b.	OAC rule 3745-17-11(B)(1)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-18-06(E)(2)	194.66 lbs sulfur dioxide (SO2)/hr [See b)(2)d.]

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) has been determined to be the use of natural gas and compliance with the terms and conditions of this permit.

SO2 and volatile organic compounds (VOC) emissions are considered to be negligible and will not be included as part of BAT.

b. The uncontrolled mass rate of particulate emissions (PE)* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).



* The burning of natural gas is the only source of PE from this emissions unit.

- c. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- d. The actual SO₂ emissions from this emissions unit is negligible because the combustion of natural gas is the only source of these emissions (the combustion of natural gas produces negligible amounts of SO₂ emissions).
- e. All PE is assumed to be particulate matter less than 10 microns in size (PM₁₀).

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

[PTI P0118458 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) 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.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) 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 days after the deviation occurs.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

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 Limitations:

1.18 lbs NO_x/hr; 5.15 tons NO_x/yr

Applicable Compliance Method:

The hourly emission limitation was established by using the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (7/98) of 100 lbs NO_x/10⁶scf for natural gas and dividing by a conversion factor of 1020 BTU/scf, then multiplying by a maximum input rate of 12.0 mmBtu/hr.



If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 7. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

0.99 lb CO/hr; 4.33 tons CO/yr

Applicable Compliance Method:

The hourly emission limitation was established by using the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (7/98) of 84 lbs CO/10⁶scf for natural gas and dividing by a conversion factor of 1020 BTU/scf, then multiply by a maximum input rate of 12.0 mmBtu/hr.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 10. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

0.09lb PE/hr; 0.39 ton PE/yr

Applicable Compliance Method:

The hourly emission limitation was established by using the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (7/98) of 7.6 lbs PE/10⁶scf for natural gas and dividing by a conversion factor of 1020 BTU/scf, then multiply by a maximum input rate of 12.0mmBtu/hr.

If required, compliance with the lb/mmBtu and the hourly emission limitation shall be determined by stack testing in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.



The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

194.66 lbs SO₂/hr

Applicable Compliance Method:

This emission limit is based on the equation specified in OAC rule 3745-18-06(E)(2), applying a maximum process weight rate of 16.3 tons per hour.

Compliance with this hourly allowable SO₂ emission limitation shall be demonstrated as long as natural gas is the only fuel combusted in this emissions unit.

If required, compliance with the hourly emission limitation shall be determined by stack testing in accordance with Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

8. P051, 30 MMBtu/hr Boiler in Boiler House

Operations, Property and/or Equipment Description:

30 mmBtu/hr natural gas fired boiler

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 3745-17-10(B)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-18-06(E)	See b)(2)a.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A).

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) 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.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) 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 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

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:

0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

The permittee may determine compliance with the PE limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42 Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of this emissions unit (mmBtu/hr).

If required, compliance with the lb/mmBtu PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

[OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, compliance shall be determined by visible emissions evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.

9. P054, VTD

Operations, Property and/or Equipment Description:

Vacuum Tank Degasser with a burnoff combustion chamber (flare) for control (Formerly TMP189760)

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) [PTI P0118312, issued 4/7/2015]	15.49 lbs carbon monoxide (CO)/hr; 67.83 tons CO/yr See b)(2)a. and b)(2)b.

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) requirements have been determined to be the compliance with the terms and conditions of this permit.

b. The hourly and annual emission limitations represent the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with the emissions limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

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 Limitations:

15.49 lbs CO/hr; 67.83 tons CO/yr

Applicable Compliance Method:

The hourly and annual emission limitations represent the emissions unit's potential to emit*. Therefore, it is not necessary to develop record keeping and/or reporting requirements.

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

*The maximum hourly emission rate is calculated by multiplying the emission factor of 526.6 lb CO/mm cu ft (back calculated from Colorado Air Operating Permit No. 95OPPB097) by a conversion factor of 1 mm cu ft/1020 Btu and multiplying by the maximum heat input capacity of 30 mmBtu/hr.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[PTI P0118312 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.

10. P055, Bell Furnace #70 (Annealing)

Operations, Property and/or Equipment Description:

10.0 mmBtu/hr natural gas fired annealing furnace (formerly TMP189774)

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) [PTI P0118312, issued 4/7/2015]	0.98 lb nitrogen oxides (NO _x)/hr; 4.30 tons NO _x /yr 0.82 lb carbon monoxide (CO)/hr; 3.61 tons CO/yr 0.07lbparticulate emissions (PE)/hr; 0.33 ton PE/yr [See b)(2)e.] See b)(2)a.
b.	OAC rule 3745-17-11(B)(1)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-18-06(E)(2)	194.66 lbs sulfur dioxide (SO ₂)/hr [See b)(2)d.]

(2) Additional Terms and Conditions

a. The “Best Available Technology” (BAT) requirements have been determined to be the use of natural gas and compliance with the terms and conditions of this permit.

SO₂ and volatile organic compounds (VOC) emissions are considered to be negligible and will not be included as part of BAT.

b. The uncontrolled mass rate of particulate emissions (PE)* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition,

Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

* The burning of natural gas is the only source of PE from this emissions unit.

- c. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- d. The actual SO₂ emissions from this emissions unit are negligible because the combustion of natural gas is the only source of these emissions (the combustion of natural gas produces negligible amounts of SO₂ emissions).
- e. All PE is assumed to be particulate matter less than 10 microns in size (PM₁₀).

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

[PTI P0118312 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) 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.

[PTI P0118312 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) 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 days after the deviation occurs.

[PTI P0118312 and OAC rule 3745-77-07(C)(1)]

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 Limitations:

0.98 lb NO_x/hr; 4.30 tons NO_x/yr

Applicable Compliance Method:

The hourly emission limitation was established by using the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4



(7/98) of 100 lbs NO_x/10⁶scf for natural gas and dividing by a conversion factor of 1020 BTU/scf, then multiplying by a maximum input rate of 10.0 mmBtu/hr.

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

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[PTI P0118312 and OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

0.82 lb CO/hr; 3.61 tons CO/yr

Applicable Compliance Method:

The hourly emission limitation was established by using the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (7/98) of 84 lbs CO/10⁶scf for natural gas and dividing by a conversion factor of 1020 BTU/scf, then multiplying by a maximum input rate of 10.0 mmBtu/hr.

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

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[PTI P0118312 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

0.07lb PE/hr; 0.33 ton PE/yr

Applicable Compliance Method:

The hourly emission limitation was established by using the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th edition, section 1.4 (7/98) of 7.6 lbs PE/10⁶scf for natural gas and dividing by a conversion factor of 1020 BTU/scf, then multiplying by a maximum input rate of 10.0mmBtu/hr.



If required, compliance with the lb/mmBtu and the hourly emission limitation shall be determined by stack testing in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[PTI P0118312 and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

194.66 lbs SO₂/hr

Applicable Compliance Method:

This emission limit is based on the equation specified in OAC rule 3745-18-06(E)(2), applying a maximum process weight rate of 16.3 tons per hour.

Compliance with this hourly allowable SO₂ emission limitation shall be demonstrated as long as natural gas is the only fuel combusted in this emissions unit.

If required, compliance with the hourly emission limitation shall be determined by stack testing in accordance with OAC rule 3745-18-04(E)(1).

[PTI P0118312 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

**11. Emissions Unit Group -Group 1:
 P024,P025,P026,P027,P031,P032,P033,P035,P036,P046,P047,P049,P053,**

EU ID	Operations, Property and/or Equipment Description
P024	10 mmBtu/hr, natural gas-fired forge furnace; forge furnace #109
P025	10 mmBtu/hr, natural gas-fired forge furnace; forge furnace #110
P026	10 mmBtu/hr, natural gas-fired forge furnace; forge furnace #111
P027	14.4 mmBtu/hr, natural gas-fired forge furnace; forge furnace #120
P031	10 mmBtu/hr, natural gas-fired forge furnace; forge furnace #127
P032	10 mmBtu/hr, natural gas-fired annealing furnace; induction unit #6
P033	10 mmBtu/hr, natural gas-fired annealing furnace; induction unit #7
P035	10 mmBtu/hr, natural gas-fired annealing furnace; induction unit #9
P036	10 mmBtu/hr, natural gas-fired annealing furnace; induction unit #10
P046	12.5 mmBtu/hr, natural gas-fired foundry furnace; annealing bay unit #59
P047	12.5 mmBtu/hr, natural gas-fired foundry furnace; annealing bay unit #60
P049	12.5 mmBtu/hr, natural gas-fired foundry furnace; annealing bay unit #62
P053	16.0 mmBtu/hr, natural gas-fired foundry furnace; annealer unit #5

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 3745-17-11(B)(1)	See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-18-06(E)	656.3 lbs sulfur dioxide (SO ₂)/hr [See b)(2)c.]

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions (PE)* from each emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

*The burning of natural gas is the only source of PE from these emissions units.

- b. These emissions units are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because these emissions units are not subject to the requirements of OAC rule 3745-17-11.
 - c. The actual SO₂ emissions from these emissions units are negligible because the combustion of natural gas is the only source of these emissions (the combustion of natural gas produces negligible amounts of SO₂ emissions).
- c) Operational Restrictions
- (1) The permittee shall burn only natural gas in these emissions units.
[OAC rule 3745-77-07(A)(1)]
- d) Monitoring and/or Recordkeeping Requirements
- (1) 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 each emissions unit.
[OAC rule 3745-77-07(C)(1)]
- e) Reporting Requirements
- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in these emissions units. Each report shall be submitted within 30 days after the deviation occurs.
[OAC rule 3745-77-07(C)(1)]
- 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:
656.3 lbs SO₂/hr

Applicable Compliance Method:
Compliance with the hourly allowable SO₂ emission limitation shall be demonstrated as long as natural gas is the only fuel combusted in this emissions unit.

[OAC rule 3745-77-07(C)(1)]



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g) Miscellaneous Requirements

(1) None.

12. Emissions Unit Group –Group 2: P011,P012

EU ID	Operations, Property and/or Equipment Description
P011	16.5 mmBtu/hr, natural gas-fired forge furnace; forge furnace #119
P012	16.5 mmBtu/hr, natural gas-fired forge furnace; forge furnace #123

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) [PTI 03-1173, issued 4/22/1998]	<u>From each emissions unit individually</u> 0.01 lb sulfur dioxide (SO ₂)/hr; 0.04 ton SO ₂ /yr 2.3 lbs nitrogen oxides (NO _x)/hr; 10.1 tons NO _x /yr 0.05 lb organic compounds (OC)/hr; 0.22 ton OC/yr 0.60 lb carbon monoxide (CO)/hr; 2.6 tons CO/yr 0.23 lb particulate emissions (PE)/hr; 1.01 tons PE/yr [See b)(2)d.]
b.	OAC rule 3745-17-11(B)(1)	See b)(2)a.
c.	OAC rule 3745-17-07(A)	See b)(2)b.
d.	OAC rule 3745-18-06(E)	See b)(2)c.

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions (PE)* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).



* The burning of natural gas is the only source of PE from this emissions unit.

- b. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. All PE is assumed to be particulate matter less than 10 microns in size (PM10).

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) 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.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) 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 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

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 Limitations:

0.01 lb SO₂/hr and 0.04 ton SO₂/yr

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the emission factor [AP-42, Section 1.4 (1995)] of 0.60 lb SO₂/mmscf by a conversion factor of 1 scf/1000 Btu, and by the maximum heat input of 16.5 mmBtu/hr.



If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4 and 6 of 40 CFR Part 60, Appendix A.

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hours/year and dividing by 2000 lbs/ton.

[PTI 03-1173 and OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

2.3 lbs NO_x/hr and 10.1 tons NO_x/yr

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the emission factor [AP-42, Section 1.4 (1995)] of 140 lbs NO_x/mmscf by a conversion factor of 1 scf/1000 Btu, and by the maximum heat input of 16.5 mmBtu/hr.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4 and 7 of 40 CFR Part 60, Appendix A.

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hours/year and dividing by 2000 lbs/ton.

[PTI 03-1173 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

0.05 lb OC/hr and 0.22 ton OC/yr

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the emission factor [AP-42, Section 1.4 (1995)] of 2.78 lbs OC/mmscf by a conversion factor of 1 scf/1000 Btu, and by the maximum heat input of 16.5 mmBtu/hr.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A.

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hours/year and dividing by 2000 lbs/ton.

[PTI 03-1173 and OAC rule 3745-77-07(C)(1)]



d. Emission Limitations:

0.60 lb CO/hr and 2.6 tons CO/yr

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the emission factor [AP-42, Section 1.4 (1995)] of 35 lbs CO/mmscf by a conversion factor of 1 scf/1000 Btu, and by the maximum heat input of 16.5 mmBtu/hr.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A.

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hours/year and dividing by 2000 lbs/ton.

[PTI 03-1173 and OAC rule 3745-77-07(C)(1)]

e. Emission Limitations:

0.23 lb PE/hr and 1.01 tons PE/yr

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the emission factor [AP-42, Section 1.4 (1995)] of 14 lbs PE/mmscf by a conversion factor of 1 scf/1000 Btu, and by the maximum heat input of 16.5 mmBtu/hr.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hours/year and dividing by 2000 lbs/ton.

[PTI 03-1173 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



13. Emissions Unit Group –Group 3: P020,P022

EU ID	Operations, Property and/or Equipment Description
P020	Scrap and charge handling area
P022	Pouring/casting/cooling

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 3745-17-07(B)	See b)(2)a.
b.	OAC rule 3745-17-08(B)	See b)(2)b.

(2) Additional Terms and Conditions

a. These emissions units are exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

b. This facility is not located within an “Appendix A” area as identified in OAC rule 3745-17-08 (it is located outside the city of Lima in Allen County). Therefore, pursuant to OAC rule 3745-17-08(A), these emissions units are exempt from the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.



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g) Miscellaneous Requirements

- (1) None.

14. Emissions Unit Group –Group 4: P048,P050

EU ID	Operations, Property and/or Equipment Description
P048	14.0 mmBtu/hr, natural gas-fired annealing furnace
P050	13.0 mmBtu/hr natural gas fired annealing furnace

- 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) June 30, 2008 [PTI P0118458, issued 2/13/2015]	Install burners designed to meet the following emission rates (for each emissions unit individually): 0.0075 lb particulate matter 10 microns or less in size (PM10) per mmBtu heat input 0.1187 lb nitrogen oxides (NO _x) per mmBtu heat input 0.0824 lb carbon monoxide (CO) per mmBtu heat input 0.0006 lbsulfur dioxide (SO ₂) per mmBtu heat input 0.0054 lbvolatile organic compounds (VOC) per mmBtu heat input See b)(2)a. and b)(2)f.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008 [PTI P0118458, issued 2/13/2015]	The “Best Available Technology” (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM10, NO _x , CO, SO ₂ and VOC emissions from this air contaminant source since the potential to emit is less than 10 tons/year.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)d.
e.	OAC rule 3745-18-06(E)(2)	194.66 lbs sulfur dioxide (SO ₂)/hr, from each emissions unit individually [See b)(2)e.]

(2) Additional Terms and Conditions

- a. The "Best Available Technology" (BAT) emission limitations apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The uncontrolled mass rate of particulate emissions (PE)* from these emissions units is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

* The burning of natural gas is the only source of PE from these emissions units.
- d. These emissions units are exempt from the visible PE limitation specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions units are not subject to the requirements of OAC rule 3745-17-11.
- e. The actual SO₂ emissions from these emissions units are negligible because the combustion of natural gas is the only source of these emissions (the combustion of natural gas produces negligible amounts of SO₂ emissions).
- f. In order to ensure the source continues to operate as designed; the permittee shall operate this emissions unit in accordance with manufacturer's recommendations and shall follow the manufacturer's recommended maintenance, at the recommended intervals. The permittee shall keep a record of the maintenance on this emissions unit along with manufacturer's recommendations.

c) Operational Restrictions

- (1) None.



d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

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 Limitations:

Install burners designed to meet the following emission rates (for each emissions unit individually):

0.0075 lb PM10 per mmBtu heat input

0.1187 lb NO_x per mmBtu heat input

0.0824 lb CO per mmBtu heat input

0.0006 lb SO₂ per mmBtu heat input

0.0054 lb VOC per mmBtu heat input

Applicable Compliance Methods:

The lb/mmBtu emission limitations were established based on the AP-42 emission factors provided by the permittee in permit application #A0052540.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the following methods:

for PM10, Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M;

for NO_x, Methods 1-4 and 7 of 40 CFR Part 60, Appendix A;

for CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A;

for SO₂, Methods 1-4 and 6 of 40 CFR Part 60, Appendix A; and

for VOC, Methods 1-4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]



b. Emission Limitations:

194.66 lbs SO₂/hr, from each emissions unit individually

Applicable Compliance Method:

This emission limit is based on the equation specified in OAC rule 3745-18-06(E)(2), applying a maximum process weight rate of 16.3 tons per hour.

Compliance with this hourly allowable SO₂ emission limitation shall be demonstrated as long as natural gas is the only fuel combusted in these emissions units.

If required, compliance with the hourly emission limitation shall be determined by stack testing in accordance with Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

[PTI P0118458 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.