Ohio Environmental Protection Agency

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

6/26/2015

Certified Mail

Facility ID: 0370020133
Permit Number: P0118749
County: Richland

Mr. Michael Graham
ArcelorMittal Tubular Products Shelby LLC
140 West Main Street
Shelby, OH 44875-1471

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

Dear Permit Holder:

Enclosed is a finalOhio 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
ArcelorMittal Tubular Products Shelby LLC

Facility ID:	0370020133
Permit Number:	P0118749
Permit Type:	Minor Permit Modification
Issued:	6/26/2015
Effective:	6/26/2015
Expiration:	9/18/2019

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
ArcelorMittal Tubular Products Shelby LLC

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Authorization

Facility ID:	0370020133
Facility Description:	Steel tube manufacturer
Application Number(s):	A0052045
Permit Number:	P0118749
Permit Description:	Title V minor permit modification to incorporate PTI P0118355 issued 02/12/2015 for emissions units P043 and P044.
Permit Type:	Minor Permit Modification
Issue Date:	6/26/2015
Effective Date:	6/26/2015
Expiration Date:	9/18/2019
Superseded Permit Number:	P0116317

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

ArcelorMittal Tubular Products Shelby LLC
132 W. Main Street
Shelby, OH 44875-1471

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

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 recordingsfor 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 submittedscheduled 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 permitexcept 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

Officialthat, 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 intermittentconsistent 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, noemissions unit identified in this permit that has beencertified 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 theOhio 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 ofan 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.

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. The following insignificant emission units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emission unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21and/or 40 CFR Part 60 or 63.

P036	Plant 2, 35 KW natural gas fired back-up generator (PBR #1732)
P037	Plant 1, 33 KW natural gas fired back-up generator (PBR #1733)
P038	Plant 1, 215 HP distillate oil fired firefighting water pump (PBR #1734)
P039	Plant 1, 35 KW natural gas fired front office back-up generator (PBR #1731)
B001	Plant 1, 4.68 mmBtu/hr natural gas fired boiler
B002	Plant 1, 4.68 mmBtu/hr natural gas fired boiler
B004	Plant 1, 4.68 mmBtu/hr natural gas fired boiler
B005	Plant 2, 6.7 mmBtu/hr natural gas fired boiler (PTI #03-530, issued 08-02-1977)
B006	Plant 1, 3.432 mmBtu/hr natural gas fired make-up air unit (PTI #03-530, issued 08-02-1977)
B007	Plant 2, 0.47 mmBtu/hr natural gas fired water heater (PTI #03-530, issued 08-02-1977)
B008	Plant 1, 8.3 mmBtu/hr natural gas fired boiler (PTI #03-612, issued 12-16-1977)
B009	Plant 2, 5.04 mmBtu/hr natural gas fired cogen boiler #1 (PTI #03-4959, issued 04-18-1990)
B010	Plant 2, 9.075 mmBtu/hr natural gas fired heater (PTI #03-4959, issued 04-18-1990)
B011	Plant 2, 9.075 mmBtu/hr natural gas fired heater (PTI #03-4959, issued 04-18-1990)
B012	Plant 2, 9.075 mmBtu/hr natural gas fired heater (PTI #03-4959, issued 04-18-1990)
B013	Plant 2, 9.075 mmBtu/hr natural gas fired heater (PTI #03-4959, issued 04-18-1990)
B014	Plant 2, 4.0 mmBtu/hr natural gas fired MAU (PTI #03-6538, issued 06-10-1992)
B015	Plant 2, 4.0 mmBtu/hr natural gas fired MAU (PTI #03-6538, issued 06-10-1992)
B016	4.86 mmBtu/hr natural gas fired MAU
B017	4.86 mmBtu/hr natural gas fired MAU
B018	4.86 mmBtu/hr natural gas fired MAU
B019	4.86 mmBtu/hr natural gas fired MAU
B020	4.20 mmBtu/hr natural gas fired cogen furnace
B021	Plant 2, 9.9 mmBtu/hr natural gas fired #5 boiler with low NOx burners
B022	Plant 2, 9.9 mmBtu/hr natural gas fired #6 boiler with low NOx burners
B023	Plant 2, 5.8 mmBtu/hr natural gas fired MAU with low NOx burners
B024	Plant 2, 5.8 mmBtu/hr natural gas fired MAU with low NOx burners
B025	Plant 2, 5.8 mmBtu/hr natural gas fired MAU with low NOx burners
B026	Plant 2, 5.8 mmBtu/hr natural gas fired MAU with low NOx burners
B031	Plant 2, 6.695 mmBtu/hr natural gas fired boiler #2
B032	Plant 2, 6.695 mmBtu/hr natural gas fired boiler #3
B033	Plant 2, 6.695 mmBtu/hr natural gas fired boiler #4
B034	Plant 2, 5.8 mmBtu/hr natural gas fired MAU #4
B036	Plant 2, 5.8 mmBtu/hr natural gas fired MAU #16
B037	Plant 1, 5.02 mmBtu/hr natural gas fired co-gen boiler #1

B038	Plant 1, 5.02 mmBtu/hr natural gas fired co-gen boiler #2
P001	4.7 mmBtu/hr natural gas fired hot mill reheat furnace
P007	Plant 1, 9.105 mmBtu/hr natural gas fired SRA furnace #8
P009	Plant 1, 9.85 mmBtu/hr natural gas fired SRA furnace #2
P016	Plant 2 - #16 SRA Furnace 8.5 mmBtu/hr NG Fired Anneal Furnace
P018	Plant 1 - #6 SRA Furnace 6.489 mmBtu/hr NG Anneal Furnace
P021	Plant 2 - #18 SRA Furnace 8.5 mmBtu/hr NG Anneal Furnace
P028	1.32 mmBtu/hr natural gas fired quench & temper holding furnace (PTI #03-6246, issued 02-20-1992)
P032	Plant2, 8.69 mmBtu/hr natural gas fired SRA furnace #22 (PTI #03-9375, issued 12-20-1995)
P041	Plant 2, 9.0 mmBtu/hr natural gas fired SRA furnace #24

3. Emissions unit #P036, P037 and P039 are existing emergency stationary, spark ignition reciprocating combustion engines (RICE). The RICE must meet the definition of an emergency stationary RICE in section 63.6675, which includes operating according to the provisions specified in section 63.6640(f). In addition, the following requirements found in 40 CFR Part 63 Subpart ZZZZ are applicable:

Operation, Maintenance, Monitoring and Collection	63.6625 (h), 63.6640 (f)(1) - (4) and 63.6655 (e)(2)
General Requirements	63.6605
Recordkeeping	63.6660 (a) - (c)
Reporting	63.6650

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR 63, Subpart ZZZZ]

4. The following emissions unit contained in this permit is an area source subject to 40 CFR Part 63, Subpart N, National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks: P031. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart N. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 1 of 40 CFR Part 63, Subpart N. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart N, and Subpart A.

   All the requirements of 40 CFR Part 63, Subpart N have been established in the Title V permit for this facility, which will encompass this emissions unit upon reissuance. The applicable sections of 40 CFR Part 63, Subpart N have been cited in the appropriate sections for the non-insignificant emissions unit (P031) subject to this rule. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

5. Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions units P024 and P025 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]

C. Emissions Unit Terms and Conditions

1. F001, Plant 1 and Plant 2 Roadways & Parking Areas

Operations, Property and/or Equipment Description:

Plant roadways and parking areas

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 #03-17209, issued 02/01/2007]	<u>For paved and unpaved roadways and paved parking areas</u>: 5.5 tons of fugitive particulate emissions (PE)/yr and 1.08 tons of fugitive particulate matter emissions less than or equal to 10 microns in size (PM10). <u>For paved roadways and parking areas</u>: No visible PE except for one minute during any 60-minute period and shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [See terms b)(2)c. and b)(2)e. through b)(2)i.]. <u>For unpaved roadways</u>: No visible PE except for 3 minutes during any 60-minute period and shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [See terms b)(2)d. through b)(2)i.].
b.	OAC rule 3745-17-07(B)	See b)(2)j.
c.	OAC rule 374517-08(B)	See b)(2)k.

(2) Additional Terms and Conditions

a. The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

i. paved roadways: all paved roadways

ii. paved parking areas: all paved parking area

b. The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

i. unpaved roadways: all unpaved roadways

ii. unpaved parking areas: none

c. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by watering and sweeping at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

d. The permittee shall employ best available control measures on all unpaved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways with watering and surface improvement at sufficient frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

e. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or paved parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

f. Any unpaved roadway which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway that takes the characteristics of a paved roadway due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways. Any unpaved roadway that is paved shall be subject to the visible emission limitation for paved roadways.

g. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

h. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

i. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

j. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

k. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

a. paved roadways and parking areas	minimum inspection frequency
all	once during each day of operation

b. unpaved roadways	minimum inspection frequency
all	once during each day of operation

[OAC rule 3745-77-07(C)(1) and PTI #03-17209]

(2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

[OAC rule 3745-77-07(C)(1) and PTI #03-17209]

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

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(3)d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[OAC rule 3745-77-07(C)(1) and PTI #03-17209]

e) Reporting Requirements

(1) The permittee shall submit deviation reports that identify any of the following occurrences:

a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

The deviation 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 PTI #03-17209]

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. <u>Emission Limitations:</u>

5.55 tons of fugitive PE/yr and 1.08 tons of fugitive PM10/yr

Applicable Compliance Method:

Compliance with fugitive PE and PM10 mass emission limitations shall be determined by using the emission factor equations in Section 13.2.1 (for paved roadways) and Section 13.2.2 (for unpaved roadways), in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03). Should further updates in AP-42 occur, the most current equations shall be used. These emission limits were based on the maximum vehicle miles traveled per year, and a 95% control efficiency for PE and PM10.

[OAC rule 3745-77-07(C)(1) and PTI #03-17209]

b. Emission Limitation:

No visible PE from the paved roadways and parking areas except for one minute during any 60-minute period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

[OAC rule 3745-77-07(C)(1) and PTI #03-17209]

c. Emission Limitation:

No visible PE from the unpaved roadways except for three minutes during any 60-minute period.

Applicable Compliance Method:

If required compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

[OAC rule 3745-77-07(C)(1) and PTI #03-17209]

g) Miscellaneous Requirements

(1) None.

2. P003, Plant 1- #3 Normalize Furnace

Operations, Property and/or Equipment Description:

13.125 million BTU/hr Natural Gas Fired Anneal Furnace. This furnace utilizes Dx gas primarily from source B038.

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(A)	None [See b)(2)a.]
b.	OAC rule 3745-17-11(B)	None [See b)(2)b.]
c.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO2) emissions shall not exceed 120.8 pounds per hour

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible particulate emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

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 and Dx gas** is the only source of PE from this emissions unit.

** Dx gas is derived from natural gas in a Dx generator. It is made up of mostly carbon monoxide. It is used for the purpose of preventing the oxidation of carbon when steel is in the furnace.

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 Limitation:

SO2 emissions shall not exceed 120.8 pounds per hour

Applicable Compliance Method:

The sulfur dioxide emissions generated by this emissions unit are due solely to the combustion of natural gas and Dx gas. The process materials (steel tubing) employed in this emissions unit do not generate sulfur dioxide emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the natural gas and Dx gas.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with OAC rule 3745-18-04(E).

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

g) Miscellaneous Requirements

(1) None.

3. P013, Hot Mill Rotary Furnace

Operations, Property and/or Equipment Description:

Hot mill rotary hearth 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 #P0115941, issued 01/21/2014]	Nitrogen oxides (NOx) emissions shall not exceed 12.53 lbs NOx/hour and 54.88 tons NOx/year See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	0.40 lb particulate matter less than 10 microns in size (PM10)/hr and 1.75 ton PM10/yr [See b)(2)e.] 0.032 lb sulfur dioxide (SO2)/hr and 0.14 ton SO2/yr 0.15 lb volatile organic compounds (VOC)/hr and 0.64 ton VOC/yr See b)(2)b. and b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.
d.	OAC rule 3745-17-07(A)	See b)(2)f.
e.	OAC rule 3745-17-11(B)	See b)(2)g.
f.	OAC rule 3745-18-06(E)(2)	324.8 pounds sulfur dioxide (SO2) per hour [See b)(2)h.]

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirement for this emissions unit has been determined to be the use of an oxy-fuel technology combustion system that utilizes burners which do not exceed 0.232 lb of NOx/mmBtu of actual heat input.

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

c. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the PM10, SO2 and VOC emissions from this air contaminant source since the uncontrolled potential to emit for PM10, SO2 and VOC is less than ten tons per year.

e. All emissions of particulate matter are PM10.

f. This emissions unit is exempt from the visible particulate emissions (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.

g. The uncontrolled mass rate of 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)(4).

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

h. The potential to emit for SO2 from this emissions unit is less than the emission limitation pursuant to this rule.

c) Operational Restrictions

(1) The permittee shall process "clean" raw materials (i.e., free of oils, greases, solvent, etc.) in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI #P0115941]

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

[OAC rule 3745-77-07(A)(1) and PTI #P0115941]

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) and PTI # P0115941]

(2) The permittee shall maintain monthly and annual year to date records of the operating hours for this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI # P0115941]

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) and PTI # P0115941]

f) Testing Requirements

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

a. The emission testing shall be conducted no later than 6 month prior to permit expiration, unless otherwise approved by Ohio EPA, NWDO.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for NOx.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for NOx - Methods 1 through 4 and 7E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1) and PTI #03-17301]

(2) 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. <u>Emission Limitations</u>

12.53 lbs NOx/hr; 54.88 tons of NOx/year

<u>Applicable Compliance Methods</u>

The hourly emission limitation was developed by multiplying the maximum allowable heat input of 0.232 lb/MMBtu by 1,030 MMBtu/mmcf and then multiplying by the maximum natural gas usage of 0.052430 mmcf/hr. If required, the permittee shall demonstrate compliance with the hourly NOx emission limitation in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lb/hr emission limitation by the maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI # P0115941]

b. <u>Emission Limitation</u>

324.80 lbs of SO2/hour

<u>Applicable Compliance Methods</u>

If required, the permittee shall demonstrate compliance with the hourly limitation in accordance with OAC rule 3745-18-04(E).

[OAC rule 3745-77-07(C)(1) and PTI # P0115941]

c. Emission Limitation

0.032 lb of SO2/hr and 0.14 ton SO2/year

Applicable Compliance Methods

The hourly emission limitation was developed by multiplying the emission factor of 0.6 lb SO2/mmcf of natural gas combusted [Factor Information Retrieval (FIRE) Data System, version 6.25, SCC 3-09-9] by the maximum hourly usage rate for natural gas (0.052430 mmcf/hr). If required, the permittee shall demonstrate compliance with the hourly SO2 emission limitation above in accordance with Methods 1 through 4 and 6 of 40 CFR, Part 60, Appendix A].

The annual limitation was developed by multiplying the lb/hr emission limitation by the maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI # P0115941]

d. Emission Limitation

0.40 lb PM10/hr and 1.75 ton PM10/year

Applicable Compliance Methods

The hourly emission limitation was developed by multiplying the emission factor of 7.6 lb PM10/mmcf of natural gas combusted [AP-42 Table 1.4-2 [7/98]] by the maximum hourly usage rate for natural gas (0.052430 mmcf/hr). If required, the permittee shall demonstrate compliance with the hourly PM10 limitation above in accordance with Methods 1 through 4 of 40 CFR, Part 60, Appendix A and Methods 201, 201A and 202 of 40 CFR, Part 51, Appendix M.

The annual limitation was developed by multiplying the lb/hr emission limitation by the maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI # P0115941]

e. Emission Limitation

0.15 lb VOC/hr and 0.64 ton VOC/year

Applicable Compliance Methods

The hourly emission limitation was developed by multiplying the emission factor of 2.8 lbs VOC/mmcf of natural gas combusted [Factor Information Retrieval (FIRE) Data System, version 6.25, SCC 3-09-900-03] by the maximum hourly usage rate for natural gas (0.052430 mmcf/hr). If required, the permittee shall demonstrate compliance with the hourly VOC limitation above in accordance with the procedures specified in Methods 1 through 4 and 18, 25 or 25A, as appropriate of 40 CFR, Part 60, Appendix A.

The annual limitation was developed by multiplying the lb/hr emission limitation by the maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI # P0115941]

g) Miscellaneous Requirements

(1) None.

4. P014, Plant 1- Pickle Tubs 1-7

Operations, Property and/or Equipment Description:

Inhibited Sulfuric Acid Pickling Tubs. A total of 6 tubs in use continuously. The 7th tub is a spare.

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(A)	None [See b)(2)a.]
b.	OAC rule 3745-17-11(B)	None [See b)(2)b.]
c.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO2) emissions shall not exceed 321.0 pounds per hour.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible particulate emissions 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.

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).

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:

SO2 emissions shall not exceed 321.0 pounds per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly SO2 limitation based on the results of emissions testing conducted in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA..

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

g) Miscellaneous Requirements

(1) None.

5. P017, Plant 2- Pickle Tubs 1-2

Operations, Property and/or Equipment Description:

Plant 2 – Pickle Tubs 1-2

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 #03-530, issued 08/02/1977]	See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)	PE shall not exceed 31.21 pounds per hour.
d.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO2) emissions shall not exceed 325.13 pounds per hour.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) has been determined to be the use of the following controls:

i. Chemical inhibitors will be added to the acid pickling tubs resulting in 50% reduction of uncontrolled sulfur oxides (SOx) emissions; and

ii. Packed bed scrubber and collection system which is designed to capture 99% of the SOx emissions and 99.99% of the PE. The scrubber will control 98% of the PE and 99% of the SOx emissions vented to it.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the scrubber, that must be maintained in order to demonstrate compliance, shall not be less than1.5 inches of water.

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

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable scrubber liquid flow rate, that shall be maintained in order to demonstrate compliance, shall not be less than 100gallons per minute.

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

(3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in inches of water) and the scrubber liquid flow rate (in gallons per minute) during operation of this/these emissions unit(s), including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and the scrubber liquid's flow rate on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever a monitored value for any parameterdeviates from (falls below) the acceptable valuesestablished in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date(s) the investigation was conducted;

d. the names of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date the corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action; and

k. the names of the personnel who performed the work.

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

The values above are 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 value(s) based upon information obtained during future PE and SO2 tests that demonstrate compliance with the allowable PE and SO2 emissions rates for this emissions unit. In addition, approved revisions to the value(s) 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)]

e) Reporting Requirements

(1) The permittee shall submit quarterly 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 scrubber was less than the applicable limit contained in this permit;

b. each period of time when the scrubber water flow rate was less than the applicable limit contained in this permit;

c. an identification of each incident of deviation described in e)(1)a. and e)(1)b. above where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in e)(1)a. and e)(1)b. where prompt corrective action, that would bring the pressure drop and/or the scrubber water flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in e)(1)a. and e)(1)b. 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.

f) Testing Requirements

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

a. The emission testing shall be conducted no later than 6 month prior to permit expiration, unless otherwise approved by Ohio EPA, NWDO.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE and SO2.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE – Methods 1 through 5 of 40 CFR Part 60, Appendix A; for SO2 - Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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

(2) 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:

PE shall not exceed 31.21 pounds per hour

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly PE limitation based on the results of emissions testing conducted in accordance with f)(1) above.

[OAC rule 3745-77-07(C)(1) and PTI #03-530]

b. Emission Limitations:

SO2 emissions shall not exceed 325.13 pounds per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly SO2 limitation based upon the results of emissions testing conducted in accordance with f)(1) above.

[OAC rule 3745-77-07(C)(1) and PTI #03-530]

c. Emission Limitations:

Visible particulate emissions shall not exceed 20% opacity, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-530]

g) Miscellaneous Requirements

(1) None.

6. P019, Plant 1- #15 Normalize Furnace

Operations, Property and/or Equipment Description:

Plant 1 - #15 Normalize 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) [PTI #03-919, issued 04/15/1980]	See b)(2)a.
b.	OAC rule 3745-17-07(A)	None [See b)(2)b.]
c.	OAC rule 3745-17-11(B)	None [See b)(2)c.]
d.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO2) emissions shall not exceed 140.3 pounds per hour

(2) Additional Terms and Conditions

a. The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-18-06(E).

b. This emissions unit is exempt from the visible particulate emissions 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 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 and Dx gas** is the only source of PE from this emissions unit.

** Dx gas is derived from natural gas in a Dx generator. It is made up of mostly carbon monoxide. It is used for the purpose of preventing the oxidation of carbon when steel is in the furnace.

c) Operational Restrictions

(1) The permittee shall burn only natural gas and/or Dx gas in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI #03-919]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas and/or Dx 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) and PTI #03-919]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or Dx 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) and PTI #03-919]

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. <u>Emission Limitation:</u>

SO2 emissions shall not exceed 140.3 pounds per hour

<u>Applicable Compliance Method:</u>

The sulfur dioxide emissions generated by this emissions unit are due solely to the combustion of natural gas and Dx gas. The process materials (steel tubing) employed in this emissions unit do not generate sulfur dioxide emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the natural gas and Dx gas.

If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with OAC rule 3745-18-04(E).

[OAC rule 3745-77-07(C)(1) and PTI #03-919]

g) Miscellaneous Requirements

(1) None.

7. P020, Plant 1- North Pickle Tub

Operations, Property and/or Equipment Description:

Plant 1 – North Pickle Tub

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 #03-919, issued 04/15/1980]	See b)(2)a.
b.	OAC rule 3745-17-07(A)	None [See b)(2)b.]
c.	OAC rule 3745-17-11(B)	None [See b)(2)c.]
d.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO2) emissions shall not exceed 211.9 pounds per hour.

(2) Additional Terms and Conditions

a. The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-18-06(E)(2).

b. This emissions unit is exempt from the visible particulate emissions 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 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).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

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

a. The emission testing shall be conducted no later than 6 month prior to permit expiration, unless otherwise approved by Ohio EPA, NWDO.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for SO2.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE – Methods 1 through 5 of 40 CFR Part 60, Appendix A; for SO2 - Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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

(2) 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:

211.9 lbs SO2/hr (stack)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly SO2 limitation based upon the results of emissions testing conducted in accordance with f)(1) above.

[OAC rule 3745-77-07(C)(1) and PTI #03-919]

g) Miscellaneous Requirements

(1) None.

8. P022, Plant 2- #17 Normalize Furnace

Operations, Property and/or Equipment Description:

15.75 Million BTU/hr Natural Gas Fired Anneal 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 #03-530, issued 08/02/1977]	See b)(2)a.
b.	OAC rule 3745-17-07(A)	None [See b)(2)b.]
c.	OAC rule 3745-17-11(B)	None [See b)(2)c.]
d.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO2) emissions shall not exceed 167.3 pounds per hour

(2) Additional Terms and Conditions

a. The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-18-06(E).

b. This emissions unit is exempt from the visible particulate emissions 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 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 and Dx gas** is the only source of PE from this emissions unit.

** Dx gas is derived from natural gas in a Dx generator. It is made up of mostly carbon monoxide. It is used for the purpose of preventing the oxidation of carbon when steel is in the furnace.

c) Operational Restrictions

(1) The permittee shall burn only natural gas and/or Dx gas in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI #03-530]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas and/or Dx 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) and PTI #03-530]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or Dx 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) and PTI #03-530]

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. <u>Emission Limitation:</u>

Sulfur dioxide emissions shall not exceed 167.3 pounds per hour

<u>Applicable Compliance Method:</u>

The sulfur dioxide emissions generated by this emissions unit are due solely to the combustion of natural gas and Dx gas. The process materials (steel tubing) employed in this emissions unit do not generate sulfur dioxide emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the natural gas and Dx gas.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with OAC rule 3745-18-04(E).

[OAC rule 3745-77-07(C)(1) and PTI #03-530]

g) Miscellaneous Requirements

(1) None.

9. P023, Plant 2- #19 Normalize Furnace

Operations, Property and/or Equipment Description:

16.5 million Btu/hr natural gas fired No. 19 Normalize Anneal 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 #03-04897, issued 08/27/2002]	0.33 lb particulate emissions (PE)/hr 1.44 ton PE/yr 4.97 lbs nitrogen oxides (NOx)/hr 21.77 tons NOx/yr See b)(2)a.
b.	OAC rule 3745-17-07(A)	None [See b)(2)b.]
c.	OAC rule 3745-17-11(B)	None [See b)(2)c.]
d.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO2) emissions shall not exceed 140.3 pounds per hour

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-18-06(E) and 3745-21-08(B).

b. This emissions unit is exempt from the visible particulate emissions 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 uncontrolled mass rate of particulate emissions 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) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI #03-04897]

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) and PTI #03-04897]

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) and PTI #03-04897]

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. <u>Emission Limitation:</u>

0.33 lb PE/hr and 1.44 tons PE/yr

<u>Applicable Compliance Method:</u>

The permittee may determine compliance with the hourly limitation by multiplying the emission factor from USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (revised 7/98) of 1.9 lbs PE/mm cu.ft natural gas combusted by the maximum hourly usage rate for natural gas (.0153 mm cu.ft/hr).

If required, the permittee shall demonstrate compliance with the hourly PE limitation above in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-04897]

b. Emission Limitation:

4.97 lbs NOx/hr and 21.77 tons NOx/yr

Applicable Compliance Method:

The permittee may determine compliance with the hourly limitation by multiplying the emission factor from the burner manufacturer, Eclipse-Dungs Controls Inc., Model 75 TFB Burner with recuperators of 310 lbs NOx/mm cu.ft of natural gas combusted by the maximum hourly usage rate for natural gas (.0160 mm cu.ft/hr).

If required, the permittee shall demonstrate compliance with the hourly emission limitation above based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 7E.

Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-04897]

c. Emission Limitation:

Sulfur dioxide emissions shall not exceed 140.3 pounds per hour

Applicable Compliance Method:

The sulfur dioxide emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials (steel tubing) employed in this emissions unit do not generate sulfur dioxide emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the natural gas.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with OAC rule 3745-18-04(E).

[OAC rule 3745-77-07(C)(1) and PTI #03-04897]

g) Miscellaneous Requirements

(1) None.

10. P024, Plant 2- #8 Mill Pangborn

Operations, Property and/or Equipment Description:

Rotoblast Descaling Unit with Baghouse

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI #03-4959, issued 04/18/1990]	1.0 lbs particulate emissions (PE)/hr; 4.38 tons PE/yr See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	40 CFR, Part 64 – Compliance Assurance Monitoring (CAM)	See d) and e)

(2) Additional Terms and Conditions

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

b. The emissions limitation from this rule is less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks when this emissions units is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions,

excluding water vapor, 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 date and time of the visible emission observation;

b. the identification of the stack observed;

c. the color of the emissions;

d. the total duration of any visible emission observation; and

e. the corrective actions, if any, taken to eliminate the visible emissions.

[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. TheCAM performance indicator for the baghouse controlling this emissions unit is weekly and dailyvisible emission checks. When the dailyvisible emission checks show operation outsideits normal or usual manner of operation, the permittee shall take corrective actions torestore operation of the emissions unit and/or its control equipment to its normal or usualmanner of operation as expeditiously as practicable in accordance with good air pollutioncontrol practices for minimizing emissions, and shall comply with the reportingrequirements specified in e)(1) below. The emissions unit and control equipmentshall be operated in accordance with the approved CAM Plan, or any approved revisionof the Plan.The baghouse shall not be configured to have bypass capability.

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

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

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

e) Reporting Requirements

(1) 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. the root cause and any corrective actions taken to minimize or eliminate the visible particulate.

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]

f) Testing Requirements

(1) Compliance with the emissions limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitations:

1.0 lbs PE/hr and 4.38 tons PE/yr

Applicable Compliance Method:

The permittee may determine compliance with the hourly limitation by multiplying the emission factor from Max Roper, 1986, Gray Iron/Steel Manufacturing Update, of 17 lbs PE/ton by 10 tons steel/hour, and applying a control efficiency of 1 – 0.99.

If required, the permittee shall demonstrate compliance with the hourly PE limitation above in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

Compliance with the annual limitation shall be demonstrated as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-04959]

b. Emission Limitation:

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

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the above visible particulate emissions limitations pursuant to OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-04959]

g) Miscellaneous Requirements

(1) None.

11. P025, Plant 2- #12 Mill Pangborne

Operations, Property and/or Equipment Description:

Rotoblast Descaling Unit with Baghouse

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI #03-5330, issued 10/15/1990]	2.0 lbs particulate emissions (PE)/hr; 8.8 tons PE/yr See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	40 CFR, Part 64 – Compliance Assurance Monitoring (CAM)	See sections d) and e).

(2) Additional Terms and Conditions

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

b. The emissions limitation from this rule is less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks when this emissions units is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions,

excluding water vapor, 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 date and time of the visible emission observation;

b. the identification of the stack observed;

c. the color of the emissions;

d. the total duration of any visible emission observation; and

e. the corrective actions, if any, taken to eliminate the visible emissions.

[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. TheCAM performance indicator for the baghouse controlling this emissions unit is weekly and dailyvisible emission checks. When the dailyvisible emission checks show operation outsideits normal or usual manner of operation, the permittee shall take corrective actions torestore operation of the emissions unit and/or its control equipment to its normal or usualmanner of operation as expeditiously as practicable in accordance with good air pollutioncontrol practices for minimizing emissions, and shall comply with the reportingrequirements specified in e)(1) below. The emissions unit and control equipmentshall be operated in accordance with the approved CAM Plan, or any approved revisionof the Plan.The baghouse shall not be configured to have bypass capability.

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

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

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

e) Reporting Requirements

(1) 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. the root cause and any corrective actions taken to minimize or eliminate the visible particulate.

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]

f) Testing Requirements

(1) Compliance with the emissions limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitations:

2.0 lbs PE/hr and 8.8 tons PE/yr

Applicable Compliance Method:

The permittee may determine compliance with the hourly limitation by multiplying the emission factor from Max Roper, 1986, Gray Iron/Steel Manufacturing Update, of 17 lbs PE/ton by 10 tons steel/hour, and applying a control efficiency of 1 – 0.99.

If required, the permittee shall demonstrate compliance with the hourly PE limitation above in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

Compliance with the annual limitation shall be demonstrated as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-05330]

b. Emission Limitation:

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

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the above visible particulate emissions limitations pursuant to OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-05330]

g) Miscellaneous Requirements

(1) None.

12. P031, P031-W.Chrome Tank

Operations, Property and/or Equipment Description:

Hard Chrome electroplating system with a Duall-Hexmaster Chrome Scrubber System.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-11(B)	0.551 lb PE/hr
c.	40 CFR, Part 63, Subpart N (40 CFR 63.340-348) [In accordance with 40 CFR 63.342(c)(1)(ii), this emissions unit is an existing open surface hard chromium electroplating unit at a small hard chromium electroplating facility.]	See b)(2)a. [40 CFR 63.342(C)(1)(ii)]
d.	40 CFR 63.1-15 [40 CFR 63.340(b)]	Table 1 of Subpart N of 40 CFR Part 63 – Applicability of General Provisions to Subpart N shows which part of the General Provisions in 40 CFR Part 63.1-15 apply.

(2) Additional Terms and Conditions

a. The permittee shall not allow the concentration of total chromium in the exhaust gases discharged to the atmosphere to exceed 0.03 milligram (mg)/dry standard cubic meter (dscm) (1.3E-5 gr/dscf).

c) Operational Restrictions

(1) At all times, including periods of start-up, shutdown, and malfunction, the permittee shall operate and maintain any chromium electroplating or anodizing tank, including associated air pollution control devices and monitoring equipment, in a manner consistent with the operation and maintenance plan required by these terms and conditions.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart N]

(2) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart N]

(3) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the appropriate Ohio EPA District Office or local air agency, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emissions unit. Based on this information, the appropriate Ohio EPA District Office or local air agency may require that the permittee make changes to the operation and maintenance plan if that plan:

a. does not address a malfunction that has occurred;

b. fails to provide for the operation of the emissions units, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution practices; or

c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart N]

(4) The permittee's operation and maintenance plan shall include the following elements:

a. The plan shall specify the operation and maintenance criteria for the affected emissions unit, the add-on air pollution control device (if such a device is used to comply with the emission limitations), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of the equipment.

b. The operation and maintenance plan shall incorporate the following work practice standards:

i. Visually inspect the device at least once per quarter to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.

ii. Visually inspect at least once per quarter the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.

iii. Visually inspect at least once per quarter the ductwork from tank to the control device to ensure there are no leaks.

iv. Perform washdown of the composite mesh-pads in accordance with manufacturer's recommendations.

c. If a pitot tube is used for monitoring, the operation and maintenance plan shall incorporate the following work practice standards to be performed at least once per quarter:

i. Backflush with water, or remove from the duct and rinse with fresh water.

ii. Replace in the duct and rotate 180 degrees to ensure that the same zero reading is obtained.

iii. Check pitot tube ends for damage. Replace pitot tube if cracked or fatigued.

d. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.

e. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.

f. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs.

g. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart N]

(5) The permittee shall keep the written operation and maintenance plan on site for the life of the emissions unit and make it available for inspection, upon request, by the appropriate Ohio EPA District Office or local air agency. If the operation and maintenance plan is revised, the permittee shall keep previous versions of the plan on

record to be made available for inspection, upon request, by the appropriate Ohio EPA District Office or local air agency for a period of 5 years after each revision to the plan.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart N]

(6) The permittee may use applicable standard operating procedure manuals, Occupational Safety and Health Administration plans, or other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart N]

d) Monitoring and/or Recordkeeping Requirements

(1) During the initial performance test, the permittee shall determine the outlet chromium concentration using the methods as described in the "Testing Requirements" section of this permit to comply with the emission limitation through the use of a packed-bed scrubber and composite mesh-pad system. The permittee shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in the "Testing Requirements" section of this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart N]

(2) The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliance value the average pressure drop measured over the three test runs of one performance test and accept plus or minus 1 inch of water column from this value as the compliant range.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart N]

(3) On and after the date on which the initial performance test is required to be completed under Section 63.7 of 40 CFR Part 63, Subpart A, the permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that the emissions unit is operating. To be in compliance, the composite mesh-pad system shall be operated within plus or minus 1 inch of water column of the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart N]

(4) The permittee shall fulfill all record keeping requirements in the General Provisions to 40 CFR Part 63, according to the applicability of Subpart A.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart N]

(5) The permittee also shall maintain the following records:

a. Inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of this permit have taken place. The record can take the form of a checklist and should identify the device

inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.

b. Records of all maintenance performed on the emissions unit, add-on air pollution control device, and monitoring equipment.

c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment.

d. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan.

e. Other records, which may take the form of checklists, necessary to demonstrate consistence with the provisions of the operation and maintenance plan.

f. Test reports documenting results of all performance tests.

g. All measurements as may be necessary to determine the conditions of performance tests.

h. Records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected.

i. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control device, or monitoring equipment.

j. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control device, or monitoring equipment.

k. The total process operating time of the emissions unit during the reporting period.

l. All documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and Sections 63.9 and 63.10 of 40 CFR Part 63, Subpart A.

m. Records of the actual cumulative rectifier capacity of hard chromium electroplating tanks expended during each month of the reporting period, and the total capacity expended to date for a reporting period.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart N]

(6) All records shall be maintained for a period of 5 years.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart N]

e) Reporting Requirements

(1) The permittee shall fulfill all reporting requirements as outlined in 40 CFR Part 63, Subpart A. These reports shall be submitted to U.S. EPA with a copy also being sent to the appropriate Ohio EPA District Office or local air agency and shall be sent by U.S. mail, fax or by another courier.

a. Submittals sent by U.S. mail shall be postmarked on or before the specified date.

b. Submittals sent by other methods shall be received by U.S. EPA with a copy also being sent to the appropriate Ohio EPA District Office or local air agency on or before the specified date.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart N]

(2) The permittee shall submit a Notification of Compliance Status to the appropriate Ohio EPA District Office or local air agency 90 days after the performance test is completed, signed by the responsible official who shall certify its accuracy, attesting to whether the affected emissions unit is in compliance. The notification shall list for each affected emissions unit:

a. The applicable emission limitations and the methods that were used to determine compliance with this limitation.

b. If a performance test is required, the test report documenting the results of the performance test, which includes the elements required in the Test Requirements section of this permit, including measurements and calculations to support special compliance provisions for multiple emissions units controlled by a common add-on air pollution control device.

c. The type and quantity of hazardous air pollutants emitted by the emissions unit reported in mg/dscm or mg/hr if the emissions unit is using the special provisions for multiple emissions units controlled by a common add-on air pollution control device. (For emissions units not required to conduct a performance test, the surface tension measurement may fulfill this requirement.)

d. For each monitored parameter for which a compliant value was established, the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limitation.

e. The methods that will be used to determine continuous compliance.

f. A description of the air pollution control technique used for each emission point.

g. A statement that the permittee has completed and has on file the operation and maintenance plan as required by the work practice standards.

h. A statement by the owner or operator as to whether the emissions unit is in compliance.

i. Records to support that the facility is small.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart N]

(3) The permittee shall report to U.S. EPA and to the appropriate Ohio EPA District Office or local air agency the results of any performance test conducted. The report shall be submitted no later than 90 days following the completion of the performance test, and shall be submitted as part of the notification of compliance status report required by this section.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart N]

(4) The permittee shall prepare an ongoing compliance status report semiannually (unless a request to reduce frequency of ongoing compliance status reports has been approved) to U.S. EPA and the appropriate Ohio EPA District Office or local air agency to document the ongoing compliance status of the emissions unit. This report shall include the following:

a. The company name and address of the emissions unit.

b. An identification of the operating parameter that is monitored for compliance determination.

c. The relevant emission limitation for the emissions unit, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the Notification of Compliance Status required by this section.

d. The beginning and ending dates of the reporting period.

e. The total operating time of the emissions unit during the reporting period.

f. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes.

g. A certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit.

h. If the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit.

i. A description of any changes in monitoring, processes, or controls since the last reporting period.

j. The name, title, and signature of the responsible official who is certifying the accuracy of the report.

k. The date of the report.

l. The actual cumulative rectifier capacity expended during the reporting period, on a month-by-month basis.

m. The reports shall be submitted semiannually except when:

i. the U.S. EPA and appropriate Ohio EPA District Office or local air agency determine that more frequent reporting is necessary to accurately assess the compliance status of the emissions unit; or

ii. the monitoring data collected by the permittee show that the emission limitation has been exceeded, in which case quarterly reports shall be submitted. Once an exceedance is reported, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency is approved.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart N]

(5) The permittee who is required to submit ongoing compliance status reports on a quarterly (or more frequent basis) may reduce the frequency of reporting to semiannual if all of the following conditions are met:

a. For 1 full year (e.g., 4 quarterly or 12 monthly reporting periods), the ongoing compliance status reports demonstrate that the affected emissions unit is in compliance with the relevant emission limitation.

b. The permittee continues to comply with all applicable record keeping and monitoring requirements of 40 CFR Part 63, Subpart A and others listed in this permit.

c. The U.S. EPA and appropriate Ohio EPA District Office or local air agency do not object to a reduced reporting for the affected emissions unit and if the following requirements are met:

i. The permittee notifies the U.S. EPA and appropriate Ohio EPA District Office or local air agency in writing of its intention to make such a change, and the U.S. EPA and appropriate Ohio EPA District Office or local air agency do not object to the intended change. In deciding whether to approve a reduced reporting frequency, the U.S. EPA and appropriate Ohio EPA District Office or local air agency may review information concerning the facility's entire previous performance history during the 5-year record keeping period prior to the intended change, or the record keeping period since the facility's compliance date, whichever is shorter. Records subject to review may include performance test results, monitoring data, and evaluations of a permittee's conformance with emission limitations and work practice standards. If the request is

disapproved, the permittee will be notified in writing within 45 days after receiving notice of the permittee's intention. The notification will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted.

ii. As soon as the monitoring data show that the facility is not in compliance with the relevant emission limitation, the frequency of reporting shall revert to quarterly, and the permittee shall state this exceedance in the ongoing compliance status report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limitation for another full year, the permittee may again request approval to reduce the reporting frequency.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart N]

f) Testing Requirements

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

a. The emission testing shall be conducted no later than 6 month prior to permit expiration, unless otherwise approved by Ohio EPA, NWDO.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for chromium.

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

chromium: Method 306 of 40 CFR Part 60, Appendix A

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. In addition, all compliance testing shall be done while the emissions unit is operating under a worst case scenario.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart N]

(2) 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:

0.551 lb PE/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly PE limitation above based upon the results of emission testing for chromium conducted in accordance with 40 CFR Part 60, Appendix A, Method 306. (All PE is assumed to be in the form of chromium.)

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

b. Emission Limitation:

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

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the above visible particulate emissions limitations pursuant to OAC rule 3745-17-03(B)(1).

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

c. Emission Limitation:

0.03 mg total chromium/dscm of exhaust gas discharged to atmosphere

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing for chromium conducted in accordance with 40 CFR Part 60, Appendix A, Method 306.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart N]

(3) All monitoring equipment shall be installed such that representative measurements of emissions or process parameters from the affected emissions unit are obtained. For monitoring equipment purchased from a vendor, verification of the operational status of the monitoring equipment shall include execution of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system. Specifications for differential pressure measurement devices used to measure velocity pressure shall be in accordance with Section 2.2 of Method 2 (40 CFR Part 60, Appendix A).

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart N]

(4) The permittee shall measure the pressure drop across the add-on air pollution control device in accordance with the following guidelines:

a. Pressure taps shall be installed at any of the following locations:

i. At the inlet and outlet of the control system. The inlet tap should be installed in the ductwork just prior to the control device and the corresponding outlet pressure tap should be installed on the outlet side of the control device prior to the blower or on the downstream side of the blower.

ii. On each side of the packed bed within the control system or on each side of each mesh pad within the control system.

iii. On the front side of the first mesh pad and back side of the last mesh pad within the control system.

b. Pressure taps shall be sited at locations that are:

i. As free from pluggage as possible and away from any flow disturbances such as cyclonic demisters.

ii. Situated such that no air infiltration at the measurement site will occur that could bias the measurement.

c. Pressure taps shall be constructed of either polyethylene, polybutylene, or other nonreactive materials.

d. Nonreactive plastic tubing shall be used to connect the pressure taps to the device used to measure pressure drop.

e. Any of the following pressure gauges can be used to monitor pressure drop: a magnehelic gauge, an inclined manometer, or a "U" tube manometer.

f. Prior to connecting any pressure lines to the pressure gauge(s), each gauge shall be zeroed. No calibration of the pressure gauges is required.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart N]

(5) The permittee shall measure the velocity pressure at the inlet to an add-on air pollution control device to establish the site-specific velocity pressure as follows:

a. Locate a velocity traverse port in a section of straight duct that connects the hooding on the plating tank or tanks with the control device. The port shall be located as close to the control system as possible, and shall be placed a minimum of 2 duct diameters downstream and 0.5 diameter upstream of any flow disturbance such as a bend, expansion, or contraction. If 2.5 diameters of straight duct work does not exist, locate the port 0.8 of the duct diameter downstream and 0.2 of the duct diameter upstream from any flow disturbance.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart N]

(6) A 12-point velocity traverse of the duct to the control device shall be conducted along a single axis according to Method 2 (40 CFR Part 60, Appendix A) using an S-type pitot tube measurement of the barometric pressure and duct temperature at each traverse point is not required, but is suggested. Mark the S-type pitot tube as specified in Method 1 (40 CFR Part 60, Appendix A) with 12 points. Measure the velocity pressure (delta p) values for the velocity points and record. Determine the square root of the individual velocity point delta p values and average. The point with the square root value that comes closest to the average square root value is the point of average velocity. The delta p value measured for this point during the performance test will be used as the reference for future monitoring.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart N]

g) Miscellaneous Requirements

(1) None.

13. P033, Plant 2- #21 Normalize Furnace

Operations, Property and/or Equipment Description:

15.82 million BTU/hour Natural Gas Fired Normalize Anneal 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 #03-11177, issued 09/02/1998]	0.4 lb particulate emissions(PE)/hr, and 1.8 tons PE/yr 5.53 lbs nitrogen oxides (NOx)/hr, and 24.21 tons NOx/yr 0.01 lb sulfur dioxide (SO2)/hr, and 0.05 ton SO2/yr 0.7 lb carbon monoxide (CO)/hr, and 3.0 tons CO/yr 0.06 lb volatile organic compounds (VOC)/hr, and0.3 ton VOC/yr See b)(2)a.
b.	OAC rule 3745-17-07(A)	None [See b)(2)b.]
c.	OAC rule 3745-17-11(B)	None [See b)(2)c.]
d.	OAC rule 3745-18-06(E)(2)	See b)(2)d.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-08(B) and use of low NOx burners.

b. This emissions unit is exempt from the visible particulate emissions 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 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.

d. The emission limitation from this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI #03-11177]

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) and PTI #03-11177]

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) and PTI #03-11177]

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. <u>Emission Limitations:</u>

0.4 lb PE/hr and 1.8 tons PE/yr

<u>Applicable Compliance Method:</u>

The permittee may determine compliance with the hourly limitation by multiplying the emission factor from USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (revised

7/98) of 1.9 lbs PE/mm cu.ft natural gas combusted by the maximum hourly usage rate for natural gas (.0154 mm cu.ft/hr).

If required, the permittee shall demonstrate compliance with the hourly PE limitation above in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

Compliance with the annual limitation shall be demonstratedas long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-11177]

b. Emission Limitations:

5.53 lbs NOx/hr and 24.21 tons NOx/yr

Applicable Compliance Method:

The permittee may determine compliance with the hourly limitation by multiplying the emission factor from the burner manufacturer, Eclipse-Dungs Controls Inc., Model 75 TFB Burner with recuperators of 360 lbs NOx/mm cu.ft of natural gas combusted by the maximum hourly usage rate for natural gas (.0154 mm cu.ft/hr).

Compliance with the annual limitation shall be demonstratedas long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-11177]

c. Emission Limitations:

0.01 lb SO2/hr and 0.05 ton SO2/yr

Applicable Compliance Method:

The permittee may determine compliance with the hourly limitation by multiplying the emission factor from the source classification code document for Fabricated Metal Products (SCC # 3-09-900-03) of 0.6 lb SO2/mm cu.ft of natural gas combusted by the maximum hourly usage rate for natural gas (.0154 mm cu.ft/hr).

If required, the permittee shall demonstrate compliance with the hourly SO2 emission limitation above in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

Compliance with the annual limitation shall be demonstratedas long as compliance with the hourly limitation is maintained (the annual limitation was

calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-11177]

d. Emission Limitations:

0.7 lb CO/hr and 3.0 tons CO/yr

Applicable Compliance Method:

The permittee may determine compliance with the hourly limitation by multiplying the emission factor from USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (revised 7/98) of 24 lbs CO/mm cu.ft natural gas combusted by the maximum hourly usage rate for natural gas (.0154 mm cu.ft/hr).

Compliance with the annual limitation shall be demonstratedas long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-11177]

e. Emission Limitations:

0.06 lb VOC/hr and 0.3 ton VOC/yr

Applicable Compliance Method:

The permittee may determine compliance with the hourly limitation by multiplying the emission factor from the source classification code document for Fabricated Metal Products (SCC # 3-09-900-03) of 2.8 lbs VOC/mm cu.ft of natural gas combusted by the maximum hourly usage rate for natural gas (.0154 mm cu.ft/hr).

If required, the permittee shall demonstrate compliance with the VOC emission limitation above in accordance with the procedures specified in 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate.

Compliance with the annual limitation shall be demonstratedas long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-11177]

g) Miscellaneous Requirements

(1) None.

14. P034, Plant 2- N. Pickle Tub

Operations, Property and/or Equipment Description:

Inhibited Sulfuric Acid Pickle Tub with Xerxes Acid Scrubber System

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI #03-1400, issued 06/23/99]	See b)(2)a. Stack emissions: 0.46 lb sulfur dioxide (SO2)/hr; and 2.0 tons SO2/yr 1.42 lbs particulate emissions (PE)/hr; and 6.2 tons PE/yr Visible particulate emissions shall not exceed 20% opacity, except as provided by rule. Fugitive emissions: 4.02 lbs SO2/hr; and 17.6 tons SO2/yr 0.014 lb PE/hr; and 0.06 ton PE/yr
b.	OAC rule 3745-17-07(A)	None [See b)(2)b.]
c.	OAC rule 3745-17-11(B)	None [See b)(2)c.]
d.	OAC rule 3745-18-06(E)(2)	See b)(2)d.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) has been determined to be the use of the following controls:

i. Chemical inhibitors will be added to the acid pickling tubs resulting in 50% reduction of uncontrolled sulfur oxides (SOx) emissions; and

ii. Packed bed scrubber and collection system which is designed to capture 99% of the SOx emissions and 99.99% of the PE. The scrubber will control 98% of the PE and 99% of the SOx emissions vented to it.

b. This emissions unit is exempt from the visible particulate emissions 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 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).

d. The emission limitation from this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) The pressure drop across the scrubber shall be continuously maintained at a value of not less than 1.5 inches of water at all times while the emissions unit is in operation.

[OAC rule 3745-77-07(A)(1) and PTI# 03-1400]

(2) The scrubber water flow rate shall be continuously maintained at a value of not less than 120 gallons per minute at all times while the emissions unit is in operation.

[OAC rule 3745-77-07(A)(1) and PTI# 03-1400]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate andmaintain equipment to continuously monitor the staticpressure drop across the scrubber and the scrubberwater flow rate while the emissions unit is inoperation. The monitoring devices and any recordersshall be installed, calibrated, operated and maintainedin accordance with the manufacturer's recommendations,instructions and operating manuals.

[OAC rule 3745-77-07(C)(1) and PTI# 03-1400]

(2) The permittee shall collect and record the followinginformation each day:

a. the pressure drop across the scrubber, in inchesof water, on an hourly basis;

b. the scrubber water flow rate, in gallons perminute, on an hourly basis; and,

c. the operating times for the capture (collection)system, control device, monitoring equipment, andthe associated emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI# 03-1400]

e) Reporting Requirements

(1) The permittee shall submit quarterly 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 scrubber was less than the applicable limit contained in this permit; and

b. each period of time when the scrubber water flow rate was less than the applicable limit contained in this permit.

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 PTI #03-1400]

f) Testing Requirements

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

a. The emission testing shall be conducted no later than 6 month prior to permit expiration, unless otherwise approved by Ohio EPA, NWDO.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for SO2 and PE.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Methods 1 through 5 of 40 CFR Part 60, Appendix A; and for SO2, Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit

and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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

(2) 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:

1.42 lbs PE/hr; and 6.2 tons PE/yr (stack)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the PE limitation above in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. [See f)(1)].

Compliance with the annual limitation shall be demonstratedas long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-1400]

b. Emission Limitations:

0.46 lb SO2/hr; and 2.0 tons SO2/yr (stack)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly SO2 emission limitation above based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 6. [See f)(1)].

Compliance with the annual limitation shall be demonstratedas long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-1400]

c. Emission Limitations:

4.02 lbs SO2/hr; and 17.6 tons SO2/yr (fugitive)

Applicable Compliance Method:

The emissions estimate is based on actual lab inhibitor test data which demonstrate uncontrolled sulfur oxide emissions are 804 lbs/hr. The use of a chemical inhibitor reduces emissions by fifty percent. Two percent of these emissions are not captured and are emitted as fugitive emissions.

Compliance with the annual limitation shall be demonstratedas long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-1400]

d. Emission Limitations:

0.014 lb PE/hr; and 0.06 ton PE/yr (fugitive)

Applicable Compliance Method:

Emission estimate is based on air emissions testing of a similar emissions unit. Uncontrolled PE emissions are 140.0 lbs/hr. The control equipment achieves 99.99% capture. The actual PE emitted as fugitive emissions are 0.01% of 140.0 lbs/hr.

Compliance with the annual limitation shall be demonstratedas long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-1400]

e. Emission Limitations:

Visible particulate emissions shall not exceed 20% opacity, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

[OAC rule 3745-77-07(C)(1) and PTI #03-1400]

g) Miscellaneous Requirements

(1) None.

15. P035, Hot Mill Abrasive Saw

Operations, Property and/or Equipment Description:

Hot Mill Abrasive Saw equipped with Cyclone Dust Collector and Torit Dust Filtering System

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-02(A)(2) [PTI #03-17212, issued 11/14/2006]	Particulate emissions equal to or less than 10 microns size (PM10) shall not exceed 0.002 pound per hour and 0.01 ton per year Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

a. The permittee has requested voluntary allowable emission limitations of 0.002 pound PM10/hour and 0.01 ton PM10/year. The short-term (pound/hour)and long-term (tons/year) emission limitations for PM10 are being established as practically and legally enforceable requirements representing the potential to emit based on the use of a cyclone/baghouse control system. The control system which consists of a cyclone followed by a baghouse shall achieve an overall control efficiency of 99.98 % for particulate matter.

b. All emissions of particulate matter from the control system are PM10.

c. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. the total duration of any visible emission incident; and

c. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-17212]

e) Reporting Requirements

(1) 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 appropriate Ohio EPA district or local field office 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 PTI #03-17212]

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. <u>Emission Limitations:</u>

0.002 lb PM10/hr and 0.01 ton PM10/yr

<u>Applicable Compliance Method:</u>

The hourly emission limitation was determined by applying a 99.98% overall control efficiency for the use of a cyclone/baghouse control system to an

uncontrolled mass rate of emission of 11.33 lbs particulate matter per hour. If required, testing shall be conducted in accordance with Methods 201 and 202, 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the appropriate Ohio EPA district office or local field office.

The annual emission limitation was developed by multiplying the hourly emission limitation, the maximum operating schedule of 8760 hours/year, and 0.0005 tons/lb. Therefore, if compliance is shown with the hourly limitation, compliance with the annual limitation will be assumed.

[OAC rule 3745-77-07(C)(1) and PTI #03-17212]

b. Emission Limitation:

Visible particulate emissions shall not exceed 0% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

[OAC rule 3745-77-07(C)(1) and PTI #03-17212]

g) Miscellaneous Requirements

(1) None.

16. P040, Quench & Temper Walking Beam Furnace

Operations, Property and/or Equipment Description:

13.8 mmBtu/hr natural gas fired 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 #03-17455, issued 08/15/2008]	See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)c.
d.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO2) emissions shall not exceed 103.84 pounds per hour [See b)(2)d.]

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of SO2, particulate matter 10 microns or less in size (PM10), nitrogen oxides (NOx) and volatile organic compounds (VOC) from this air contaminant source since the uncontrolled potential to emit for SO2, PM10, NOx and VOC are each less than 10 tons per year.

The potential to emit for this emissions unit is 0.45 ton PM10/year**, 0.04 ton SO2/year, 8.29 tons NOx/year and 0.17 ton VOC/year. Potential emissions were determined by multiplying the maximum heat input of 13.8 mmBtu/hour, by the emission factors below, a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton and 1020 Btu/scf:

PM10 - 7.6 lb/million scf, AP-42, Table 1.4-2 (7/98)

SO2 - 0.6 lb/million scf, Factor Information Retrieval (FIRE) Data System, version 6.25, SCC 3-09-900-03

NOx – 140 lb/million scf, Factor Information Retrieval (FIRE) Data System, version 6.25, SCC 3-09-900-03

VOC - 2.8 lb/million scf, Factor Information Retrieval (FIRE) Data System, version 6.25, SCC 3-09-900-03

**All emissions of particulate matter are PM10.

b. This emissions unit is exempt from the visible particulate emissions (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 uncontrolled mass rate of 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.

d. The potential to emit for emissions of SO2 from this emissions unit is less than the emission limitation pursuant to this rule [See b)(2)a.]

c) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI #03-17455]

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) and PTI #03-17455]

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) and PTI #03-17455]

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:

103.84 lbs SO2/hour

Applicable Compliance Method:

The potential to emit for SO2 from this emissions unit is less than the emission limitation established pursuant to OAC rule 3745-18-06(E)(2).

The potential to emit for this emissions unit is 0.008 lb SO2/hr and was determined by multiplying the maximum heat input of 13.8 mmBtu/hour, by an emission factor of 0.6 lb SO2/mmcf (Factor Information Retrieval (FIRE) Data System, version 6.25, SCC 3-09-900-03) and heating value of 1020 Btu/cf for natural gas. If required, the permittee shall demonstrate compliance with the hourly limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 6.

[OAC rule 3745-77-07(C)(1) and PTI #03-17455]

g) Miscellaneous Requirements

(1) None.

17. P043, Plant 1 West Pickle (PW1) Tub with Ventilation System

Operations, Property and/or Equipment Description:

Inhibited Sulfuric Acid Pickling Tub with push-pull type ventilation system

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective June 30, 2008 [PTI #P0118355, issued 02/12/2015]	0.24 ton sulfur dioxide (SO_2)per month averaged over a 12-month rolling period 0.83 ton particulate matter less than 10 microns in size (PM10) per month averaged over a 12-month rolling period See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective June 30, 2008	See b)(2)b. and b)(2)c.
c.	OAC rule 3745-17-07(A)	See b)(2)d.
d.	OAC rule 3745-17-11(B)	See b)(2)e.
e.	OAC rule 3745-18-06(E)(2)	SO_2 emissions shall not exceed 263.4 pounds per hour

(2) Additional Terms and Conditions

a. These BAT emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) [less than 10 tons per year BAT exemption] into the Ohio State Implementation Plan (SIP).

b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to SO_2 and PM10 emissions from this air contaminant source since the potential to emit is less than 10 tons/year.

c. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) [less than 10 tons per year BAT exemption] as part of the Ohio SIP.

d. This emissions unit is exempt from the visible particulate emissions limitations specified in OAC rule 375-17-07(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.

e. 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).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

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

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

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for SO_2 established pursuant to OAC rule 3745-18-06(E)(2).

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for SO_2 - Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be

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

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1) and PTI #P0118355]

(2) 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:

0.24 ton SO_2 per month averaged over a 12-month rolling period

Applicable Compliance Method:

The emission limitation above was developed by multiplying the hourly emission rate of 0.65 lb/hr [hourly emission rate is from the testing of a similar source] by 8760 hours per year, then dividing by conversion factors of 2,000 lbs per ton and 12 months per year.

[OAC rule 3745-77-07(C)(1) and PTI #P0118355]

b. Emission Limitation:

0.83 ton PM10 per month averaged over a 12-month rolling period

Applicable Compliance Method:

The emission limitation above was developed by multiplying the hourly emission rate of 2.28 lbs/hr [hourly emission rate is from the testing of a similar source] by 8760 hours per year, then dividing by conversion factors of 2,000 lbs per ton and 12 months per year.

[OAC rule 3745-77-07(C)(1) and PTI #P0118355]

c. Emission Limitation:

263.4 lbs SO_2/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 25.59 tons per hour. The permittee shall demonstrate compliance with the hourly SO_2 limitation based upon the results of emissions testing conducted in accordance with f)(1) above.

[OAC rule 3745-77-07(C)(1) and PTI #P0118355]

g) Miscellaneous Requirements

(1) None.

18. P044, #26 Stress Relief Anneal Furnace

Operations, Property and/or Equipment Description:

10.4 MM BTU Natural Gas Fired Stress Relief Anneal Furnace using Eclipse ThermJet Burners Model TJ0040 V2 Low NOx burners.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective June 30, 2008 [PTI #P0118355, issued 02/12/2015]	Install burners designed to meet the following emission rates: 0.0019 pound of particulate matter 10 microns or less in size (PM_{10}) per MMBtu heat input 0.0798 pound of nitrogen oxides (NO_x) per MMBtu heat input 0.0130 pound of carbon monoxide (CO) per MMBtu heat input 0.0006 pound of sulfur dioxide (SO_2) per MMBtu heat input 0.0027 pound of volatile organic compounds (VOC) per MMBtu heat input See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective June 30, 2008 [PTI #P0118355, issued 02/12/2015]	See b)(2)b. and b)(2)c.
c.	OAC rule 3745-17-07(A)	See b)(2)d.
d.	OAC rule 3745-17-11(B)	See b)(2)e.
e.	OAC rule 3745-18-06(E)(2)	154.1 lbs SO_2/hr [See b)(2)f.]

(2) Additional Terms and Conditions

a. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) [less than 10 tons per year BAT exemption] into the Ohio State Implementation Plan (SIP).

b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to NOx, CO, VOC, SO_2 and PM10 emissions from this air contaminant source since the potential to emit is less than 10 tons/year.

c. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) as part of the Ohio SIP.

d. This emissions unit is 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 unit is not subject to the requirements of OAC rule 3745-17-11.

e. 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.

f. The actual SO_2 emissions from this emissions unit is negligible because the combustion of natural gas is the only source of the emissions (the combustion of natural gas produces negligible amounts of SO_2 emissions).

g. 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 permitteeshall 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)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

0.0019 pound of PM_{10} per MMBtu heat input

0.0798 pound of NO_x per MMBtu heat input

0.0130 pound of CO per MMBtu heat input

0.0006 pound of SO_2 per MMBtu heat input

0.0027 pound of VOC per MMBtu heat input

Applicable Compliance Methods:

The pound per MMBtu emission limitations were established based on the emission factors provided by the permittee in permit application #A0052662.

If required, the permittee shall demonstrate compliance by emission testing in accordance with the following methods: for PM_{10}, Methods 1 - 4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M; for NOx, 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 SO_2, Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A and for VOC, Methods 1-4 and 18, 25 or 25A of 40 CFR,Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0118355]

b. Emission Limitation:

154.1 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 11.5 tons per hour. Compliance with this hourly allowable SO_2 emission limitation shall be assumed as long as natural gas is the only fuel combusted in this emission unit.

If required, the permittee shall demonstrate compliance with the hourly SO_2 emissions limitation in accordance with Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0118355]

g) Miscellaneous Requirements

(1) None.