Ohio Environmental Protection Agency

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

7/8/2015

Certified Mail

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

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0616015010
Permit Number: P0119005
Permit Type: Initial Installation
County: Coshocton

Dear Permit Holder:

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

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted.Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

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

Cc: U.S. EPA Region 5 -*Via E-Mail Notification*
Ohio EPA-SEDO; West Virginia

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at:http://epa.ohio.gov/actions.aspx or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email:HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install Initial Installation
McWane Poles
592 Clow Lane,, Coshocton, OH 43812
ID#:P0119005
Date of Action: 7/8/2015
Permit Desc:Permit-to-install for bell deburr grinding (P912) with federally enforceable restrictions to avoid a PSD modification for particulate emissions..
The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the ID # or: Racheal Davies, Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138. Ph: (740)385-8501

Permit Strategy Write-Up

1. Check all that apply:

   _X_Synthetic Minor Determination

   Netting Determination

2. Source Description:

   McWane Poles (0616015010), is a new facility, currently being installed in Coshocton Co. Ohio, consisting of the following emissions units (EUs), as permitted in TV PTI P0115154, issued final September 22, 2014:
   K022: Touchup Coating
   - P902: Plasma Spigot Cut
   - P903: Plasma Bell Cut
   - P904: Spigot Deburr Grind
   - P905: ID Grind
   - P906: Plasma Length Cut
   - P907: Base Plate Weld
   - P908: Cap Weld
   - P909: Grit Wheel Blast
   - P910: Zinc Arc Spray
   - R008: Topcoat and Drying Oven

   On June 2, 2015, Ohio EPA received application A0053591, requesting the installation of an additional emissions unit, P912, Bell Deburr Grinding. The emissions from this additional emissions unit impact the project of P0115154.

   Please note that since P912 will share a common control with P902, P903, and P904, the stack PE/PM10/PM2.5 emissions of 0.77 TPY have already been accounted for. Therefore, the only increase is from the fugitive particulate emissions (2.16 TPY for PE, 0.006 TPY for PM10 and PM2.5). The addition of this unit does not trigger a major modification subject to PSD Review.

3. Facility Emissions and Attainment Status:

   McWane Poles will be a stationary facility located in Tuscarawas Township, Coshocton County, Ohio which is currently in attainment for all criteria pollutants. McWane Poles will be considered a multi-facility establishment, as determined according to Engineering Guide 58, with McWane Ductile - Ohio (0616010006). This facility has requested federally enforceable restrictions because the maximum potential to emit, at 8,760 hours per year, for these emissions units would trigger a major modification for particulate emissions, and major source classification for HAPs. Federally enforceable restrictions will lower the potential particulate emissions to less than 25 tons per year, PM_{10} emissions to less than 15 tons per year, and $PM_{2.5}$ emissions remain less than 10 tons per year. The federally enforceable restrictions will also ensure HAP emissions remain less than 25 tons per year for combined HAPs and less than 10 tons per year for any single HAP for McWane Poles and Clow Water Systems combined. These restrictions will keep the company an area source, as defined by 40 CFR Part 63.

4. Source Emissions:

   McWane Poles will be a source of PE/PM_{10}/$PM_{2.5}$, CO, SO_2, NO_X, VOC, HAPs. This facility has requested the continuation and updating of the federally enforceable restrictions to limit the facility wide PE/PM_{10}/$PM_{2.5}$ emissions to below major modification thresholds, and to limit the facility-wide, including McWane Ductile - Ohio, annual HAP emissions to 24.9 TPY total HAPS and 9.9 TPY for any single HAP. These restrictions allow the avoidance of a major modification and major source definition for HAPs.

5. Conclusion:

   The operational restrictions, emission limits, emissions testing, record keeping, and reporting requirements of this permit are sufficient to provide federally enforceable limitations to limit the potential to emit of particulate emissions from all sources at the facility to below major modification thresholds and major source HAP thresholds.

6. Please provide additional notes or comments as necessary:

   None

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

TOTAL PROJECT-WIDE POTENTIAL TO EMIT:

Pollutant:	Tons Per Year:
Total HAP (combined with McWane Ductile – Ohio emissions)	24.9
Single HAP (combined with McWane Ductile - Ohio emissions)	9.9
PE	16.37
PM_{10}	9.55
$PM_{2.5}$	9.46
VOC	37.06
NO_X	2.7
CO	2.27
SO_2	0.02

TOTAL PERMIT-Wide POTENTIAL TO EMIT:

Pollutant:	Tons Per Year:
Total HAP (combined with McWane Ductile - Ohio emissions)	24.9
Single HAP (combined with McWane Ductile - Ohio emissions)	9.9
PE	2.93
PM_{10}	0.776
$PM_{2.5}$	0.776

DRAFT

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

Facility ID:	0616015010
Permit Number:	P0119005
Permit Type:	Initial Installation
Issued:	7/8/2015
Effective:	To be entered upon final issuance

Ohio Environmental Protection Agency

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

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Authorization

Facility ID:	0616015010
Facility Description:	
Application Number(s):	A0053591
Permit Number:	P0119005
Permit Description:	Permit-to-install for bell deburr grinding (P912) with federally enforceable restrictions to avoid a PSD modification for particulate emissions.
Permit Type:	Initial Installation
Permit Fee:	$400.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	7/8/2015
Effective Date:	To be entered upon final issuance

This document constitutes issuance to:

McWane Poles
592 Clow Lane
Coshocton, OH 43812

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0119005
Permit Description: Permit-to-install for bell deburr grinding (P912) with federally enforceable restrictions to avoid a PSD modification for particulate emissions.

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

Emissions Unit ID:	**P912**
Company Equipment ID:	P912 Bell Deburr Grind
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

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

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

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

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

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

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

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

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.

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

10. Applicability

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

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

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual

obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

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

   a) None.

2. Facility-Wide Emission Limitations

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

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

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

3. Operational Restrictions

   b) The following annual operational restrictions are in place in PTI P0116276 to maintain facility-wide HAPs compliance for McWane Ductile - Ohio (0616010006):

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

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

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

      (1) Pipe Paint Operations (K006); and

      (2) Pipe Painting Operation – Large Line (K015)

   d) The following annual operational restrictions are in place in PTI P0119009 to maintain compliance with the facility-wide emission limitations on HAPs for McWane Poles (0616015010):

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

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

      (3) 19.5 tons of electrode (P907);

      (4) 19.5 tons of electrode (P908);

      (5) 180 tons of grit (P909);

      (6) 6,000 hours of operation for Cartridge Filter A, controlling emissions units P902-P904, and P912;

(7) 6,000 hours of operation for Filter C, controlling emissions units P906 and P907;

(8) 6,000 hours of operation and 54,000 million Btu of natural gas at drying oven (R008);

(9) 108,000 gallons of coating and 250 gallons of cleanup material (R008).

e) In order to maintain compliance with the facility-wide emission limitations on HAPs, the facility, McWane Ductile – Ohio (0616010006), is limited to the following annual operational restrictions:

(1) 14,000 gallons of coating and 250 gallons of cleanup (K024);

(2) 400 gallons of coating (K025);

(3) 4,000 tons of material blasted (P911);

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

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

f) The following information must be maintained each month for McWane Ductile - Ohio (0616010006):

(1) the quantity of metal melted, in tons;

(2) the rolling, 12-month summation of the quantity of metal melted, in tons; and

(3) the rolling, 12-month summation of the facility-wide individual HAP and facility-wide total combined HAP emissions, in tons;

(4) the throughput of coating and cleanup, in gallons, for each month (K024);

(5) beginning after the first 12 calendar months of operation, the rolling 12-month summation of the throughput of coating and cleanup, in gallons (K024)

(6) also during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of coating and cleanup, in gallons for each calendar month (K024);

(7) the throughput of coating, in gallons, for each month (K025);

(8) beginning after the first 12 calendar months of operation, the rolling 12-month summation of the throughput of coating, in gallons (K025)

(9) also during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of coating, in gallons for each calendar month (K025);

(10) the throughput of material blasted, in tons, for each month (P911);

(11) beginning after the first 12 calendar months of operation, the rolling 12-month summation of the throughput of material blasted, in tons (P911);

(12) also during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of material blasted, in tons, for each calendar month (P911); and

(13) the facility-wide individual HAP and facility-wide total combined HAP emissions, in tons.

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

g) As required by PTI P0116276, the following information shall collected and recorded each month for each of the HAP emitting emissions units located at McWane Ductile - Ohio (0616010006):

(1) For any month that a material containing organic HAP is used:

a. the company identification for each HAP-containing coating and cleanup material employed during the month;

b. the number of gallons of each HAP-containing coating or cleanup material employed during the month;

c. the organic HAP content of each coating and cleanup material, in pounds per gallon; and

d. the total organic HAP emission rate for all coatings and cleanup materials, in tons.

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

(2) For any month that a material containing no organic HAP is used:

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

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

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

h) As required by PTI P0119009, the following information shall be recorded each month for McWane Poles (0616015010):

(1) the throughput of coating and cleanup material usage, in gallons, for each month (K022);

(2) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of coating and cleanup material usage (K022);

(3) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of coating and cleanup material usage, for each calendar month (K022);

(4) the throughput of poles, in tons, for each month (P902-P906);

(5) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of poles, in tons (P902-P906);

(6) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of poles, in tons, for each calendar month (P902-P906);

(7) the operating hours for Cartridge Filter A and Cartridge Filter C;

(8) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the operating hours of Cartridge Filter A and Cartridge Filter C;

(9) also, during the first 12 calendar months of operation, the permittee shall record the cumulative operating hours of Cartridge Filter A and Cartridge Filter C for each calendar month;

(10) the throughput of electrode, in tons, for each month (P907 and P908);

(11) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of electrode, in tons (P907 and P908);

(12) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of electrode, in tons for each calendar month (P907 and P908);

(13) the throughput of grit, in tons, for each month (P909);

(14) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of grit, in tons (P909);

(15) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of grit, in tons for each calendar month (P909);

(16) the throughput of topcoat, in gallons, for each month (R008);

(17) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of topcoat, in gallons (R008);

(18) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of topcoat, in gallons, for each calendar month (R008);

(19) the throughput of cleanup, in gallons for each month (R008);

(20) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of cleanup, in gallons (R008);

(21) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of cleanup, in gallons, for each calendar month (R008);

(22) the maximum heat input of the drying oven, in million BTU, for each month (R008);

(23) beginning after the first 12 calendar months of operation, the rolling 12-month summation of the maximum heat input of the drying oven, in million BTU (R008);

(24) also during the first 12 calendar months of operation, the permittee shall record the cumulative maximum heat input of the drying oven, in million BTU, for each calendar month (R008); and,

(25) the rolling, 12-month summation of the facility-wide individual HAP and facility-wide total combined HAP emissions, in tons.

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

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

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

5. Reporting Requirements

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

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

k) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month summations of facility-wide individual HAP and facility-wide total combined HAP emissions limitations in 2.a). The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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

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

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

6. Testing Requirements

m) Compliance with the facility-wide (i.e. McWane Ductile - Ohio (0616010006) and McWane Poles (0616015010) combined) individual HAP and total combined HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly emissions figures determined in accordance with the recordkeeping requirements in 4.a) and 4.b)(1)(d) for all HAP emitting

emission units. Calculations shall follow the methodology presented in Attachment 2 of the amended permit-to-install application received on November 21, 2006, for McWane Ductile - Ohio (0616010006), and the methodology presented in the calculations attachment of the amended permit-to-install application received December 10, 2013, for McWane Poles (0616015010) and any subsequent revisions to that methodology approved by Ohio EPA.

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

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

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

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

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

C. Emissions Unit Terms and Conditions

1. P912, Bell Deburr Grind

Operations, Property and/or Equipment Description:

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

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

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	The emissions limitation established pursuant to this rule is equivalent to the emissions limitation established pursuant to OAC rule 3745-31-05(D). See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE/PM10/PM2.5 emissions from this air contaminant source since the calculated annual emissions rate is less than 10 tons/year taking into account the voluntary restriction from OAC rule 3745-31-05(E). See b)(2)b. below.
c.	OAC rule 3745-31-05(E) June 30, 2008	Install a cartridge filter with a 90% capture efficiency and a 99% control efficiency. PE from Cartridge Filter A, controlling emissions units P902, P903, P904, P912, and fugitive PE combined shall not exceed 2.93 tons as a rolling, 12-month summation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		PM10 from Cartridge Filter A, controlling emissions units P902, P903, P904, P912, and fugitive PM10 combined shall not exceed 0.78 tons as a rolling, 12-month summation. PM2.5 from Cartridge Filter A, controlling emissions units P902, P903, P904, P912, and fugitive PM2.5 combined shall not exceed 0.78 tons as a rolling, 12-month summation.
d.	OAC rule 3745-31-05(D) [Synthetic minor restriction to avoid major modification status and PSD review, and BAT for PE/PM_{10}/$PM_{2.5}$]	Fugitive particulate emissions (PE) shall not exceed 2.16 tons as a rolling, 12-month summation. Fugitive PM_{10} emissions shall not exceed 0.01 ton as a rolling, 12-month summation. Fugitive $PM_{2.5}$ emissions shall not exceed 0.01 ton as a rolling, 12-month summation. Stack PE/PM_{10}/$PM_{2.5}$ from Cartridge Filter A, controlling emissions units P902, P903, P904, and P912, shall not exceed 0.77 ton as a rolling, 12-month summation. See b)(2)d., b)(2)e., c)(1), and c)(3) below.
e.	OAC rule 3745-17-07(B) OAC rule 3745-17-08(B)	See b)(2)c. below.
f.	OAC rule 3745-17-11(B)(1)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(D).
g.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
h.	OAC rule 3745-31-05(E) [Voluntary restriction to show compliance with a 90% capture efficiency]	No visible emissions of fugitive PE from the building egress points.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plant (SIP).

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

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

(Authority for term: OAC rule 3745-31-05(A)(3)(a)(ii))

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

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

d. The emissions from emissions units P902, P903, P904, and P912 shall be vented to a baghouse (Cartridge Filter A) when one or more of the emissions units are in operation.

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

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

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

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

c) Operational Restrictions

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

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

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

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

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

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

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

(3) The permittee has requested a federally enforceable limitation on the annual hours of operation of Cartridge Filter A in order to restrict the federally enforceable potential to emit to avoid major modification status for PE/PM_{10}/$PM_{2.5}$. The maximum annual operating hours for Cartridge Filter A, controlling emissions units P902, P903, P904, and P912 shall not exceed 6,000 hours, based upon a rolling, 12-month rolling summation of the operating hours.

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

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

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

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

d) Monitoring and/or Recordkeeping Requirements

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

a. the throughput of poles, in tons, for each month;

b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of poles, in tons;

c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of poles, in tons, for each calendar month.

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

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

a. the operating hours for Cartridge Filter A;

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

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

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

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

a. the monthly fugitive emissions of PE, PM_{10}, and $PM_{2.5}$ from this emissions unit calculated in accordance with the following equations:

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

Fugitive PM_{10} (tons/month) = (actual throughput of poles (as recorded (d)(1)a.))*(0.0045**lb PE/(on of poles)*(1-capture efficiency (0.90)

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

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

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

b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of fugitive emissions of PE, PM_{10} and $PM_{2.5}$ from this emissions unit;

c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative fugitive emissions of PE, PM_{10} and $PM_{2.5}$ for each calendar month for this emissions unit.

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

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

a. the monthly stack emissions of PE, PM_{10}, and $PM_{2.5}$ from P902, P903, P904, and P912 combined calculated in accordance with the following equation:

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

b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of stack emissions of PE, PM_{10} and $PM_{2.5}$ from P902, P903, P904, and P912 combined;

c. also, during the first 12 calendar months of operation, the permittee shall record the cumulative stack emissions of PE, PM_{10} and $PM_{2.5}$ for each calendar month from P902, P903, P904, and P912 combined.

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

(5) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

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

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

k. the name(s) of the personnel who performed the work.

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

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

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

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

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

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

e) Reporting Requirements

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

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

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

c. all exceedances of the rolling, 12-month limitation on the hours of operation for Cartridge Filter A;

d. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative hours of operation for Cartridge Filter A;

e. all exceedances of the rolling, 12-month limitation of PE/PM_{10}/$PM_{2.5}$ found in b)(1)c. above.

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

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

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

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

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

d. each incident of deviation described in "(2)a." where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in "(2)a." where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and

October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

f) Testing Requirements

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

a. Design Efficiency Standard:

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

Applicable Compliance Method:

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

b. Emissions Limitation:

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

Applicable Compliance Method:

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

c. Emissions Limitation:

Fugitive PM_{10} emissions shall not exceed 0.01 ton as a rolling, 12-month summation.

Applicable Compliance Method:

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

d. Emissions Limitation:

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

Applicable Compliance Method:

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

e. Emissions Limitation:

Stack PE/PM_{10}/$PM_{2.5}$ from Cartridge Filter A, controlling emissions units P902, P903, P904, and P912, shall not exceed 0.77 ton as a rolling, 12-month summation.

Applicable Compliance Method:

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

f. Emissions Limitation:

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

Applicable Compliance Method:

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

g. Emissions Limitation:

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

Applicable Compliance Method

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

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

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

b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and mass emission limitation for PE/PM_{10}/$PM_{2.5}$.

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

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

PM_{10}, Method 201A found in 40 CFR Part 51, Appendix M

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

d. The capture efficiency shall be determined using Method 22 for all egress points of the enclosure (building) or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

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

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

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

g) Miscellaneous Requirements

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

composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.