



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

7/30/2015

Certified Mail

Mr. Rick Siebert
SIFCO Forge Group, Inc.
970 East 64th Street
Cleveland, OH 44103

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318001618
Permit Number: P0117877
Permit Type: Initial Installation
County: Cuyahoga

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: CDAQ



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
SIFCO Forge Group, Inc.**

Facility ID:	1318001618
Permit Number:	P0117877
Permit Type:	Initial Installation
Issued:	7/30/2015
Effective:	7/30/2015
Expiration:	6/27/2017



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

for
SIFCO Forge Group, Inc.

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit?	4
3. What records must I keep under this permit?	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application?	4
6. What happens to this permit if my project is delayed or I do not install or modify my source?	5
7. What reports must I submit under this permit?	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	7
15. What happens if a portion of this permit is determined to be invalid?	7



Final Permit-to-Install and Operate
SIFCO Forge Group, Inc.
Permit Number: P0117877
Facility ID: 1318001618
Effective Date: 7/30/2015

Authorization

Facility ID: 1318001618
Application Number(s): A0051609
Permit Number: P0117877
Permit Description: Initial FEPTIO for five natural gas-fired boilers (B004, B005, B006, B007 and B008) that are physically replacing natural gas-fired boilers B001, B002 and B003.
Permit Type: Initial Installation
Permit Fee: \$4,000.00
Issue Date: 7/30/2015
Effective Date: 7/30/2015
Expiration Date: 6/27/2017
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

SIFCO Forge Group, Inc.
970 East 64th Street
Cleveland, OH 44103

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

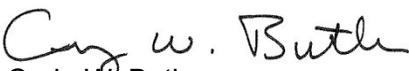
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erievue Plaza
Cleveland, OH 44114
(216)664-2297

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0117877
Permit Description: Initial FEPTIO for five natural gas-fired boilers (B004, B005, B006, B007 and B008) that are physically replacing natural gas-fired boilers B001, B002 and B003.

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

Emissions Unit ID:	B004
Company Equipment ID:	VP-001
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B005
Company Equipment ID:	VP-002
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B006
Company Equipment ID:	VP-003
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B007
Company Equipment ID:	VP-004
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B008
Company Equipment ID:	VP-005
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
SIFCO Forge Group, Inc.
Permit Number: P0117877
Facility ID: 1318001618
Effective Date: 7/30/2015

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



Final Permit-to-Install and Operate
SIFCO Forge Group, Inc.
Permit Number: P0117877
Facility ID: 1318001618
Effective Date: 7/30/2015

B. Facility-Wide Terms and Conditions



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

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

(1) None.

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

(2) c)(1), d)(1), e)(2), f)(1), and 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(D)(1)(b) Synthetic Minor to Avoid Title V	Nitrogen oxide (NOx) emissions shall not exceed 83.3 tons per rolling, 12-month period. Carbon monoxide (CO) emissions shall not exceed 69.97 tons per rolling, 12-month period. See d)(1) below.
b.	OAC rule 3745-24	See b)(2)a, e)(4), and e)(5) below.

(2) Additional Terms and Conditions

a. The permittee shall comply with the requirements of OAC rule 3745-24 regarding NOx and VOC emissions relative to the nonattainment status of Cuyahoga County for ozone. If Cuyahoga County is redesignated to attainment, then beginning January 1 of the year following the U.S. EPA redesignation to attainment of the National Ambient Air Quality Standard for ozone, this rule requirement will not apply.

- c) Operational Restrictions
 - (1) The maximum annual facility-wide natural gas usage shall not exceed 1666 mmscf per year, based upon a rolling, 12-month summation of the monthly fuel usage.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain monthly records of the following:
 - a. the amount of natural gas burned, in mmscf, facility-wide; and
 - b. the rolling, 12-month summation of the facility-wide natural gas usage amounts, in mmscf.
- e) Reporting Requirements
 - (1) 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.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. 1666 mmcf natural gas burned facility-wide based upon a rolling, 12-month summation; and
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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, electronically through Ohio EPA Air Services, 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 Cleveland Division of Air Quality.
 - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

- (4) If NO_x or VOC is emitted at or above the reporting threshold, the permittee shall submit emission statements for both pollutants to the Ohio EPA through Air Services online web portal and shall include at a minimum the following information:
 - a. the certifying individual shall certify that the information contained in the statement is accurate to the best of their knowledge and that all estimates and judgments relating to such information have been made in good faith;
 - b. estimated actual emissions of NO_x and VOC, in tons per year; and
 - c. any supporting information required by the director to confirm compliance with paragraph e)(2) above.
 - (5) Emission statements must be submitted by April fifteenth of the calendar year following the year covered by the emission statements.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in c) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
NO_x emissions shall not exceed 83.3 tons per rolling, 12-month period

Applicable Compliance Method:
Compliance with the annual facility-wide NO_x emission limitation shall be determined by multiplying the emission factor for NO_x (100 lbs/mmscf of natural gas) taken from Table 1.4-1, AP-42, by the actual annual facility-wide amount of natural gas burned per rolling, 12-month period and divided by 2000 pounds.
 - b. Emission Limitation:
CO emissions shall not exceed 69.97 tons per rolling, 12-month period

Applicable Compliance Method:
Compliance with the annual facility-wide CO emission limitation shall be determined by multiplying the emission factor for CO (84 lbs/mmscf of natural gas) taken from Table 1.4-1, AP-42, by the actual annual facility-wide amount of natural gas burned per rolling, 12-month period and divided by 2000 pounds.
- g) Miscellaneous Requirements
- (1) The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart XXXXXX, National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



Final Permit-to-Install and Operate
SIFCO Forge Group, Inc.
Permit Number: P0117877
Facility ID: 1318001618
Effective Date: 7/30/2015

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group – Five - 25.1MMBtu/hr Boilers: B004,B005, B006, B007, B008

EU ID	Operations, Property and/or Equipment Description
B004	VP-001, 25.1 mmBTU/hr natural gas fired boiler
B005	VP-002, 25.1 mmBTU/hr natural gas fired boiler
B006	VP-003, 25.1 mmBTU/hr natural gas fired boiler
B007	VP-004, 25.1 mmBTU/hr natural gas fired boiler
B008	VP-005, 25.1 mmBTU/hr natural gas fired boiler

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

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

a. b)(1)c., b)(1)d., b)(2)b., c)(2), f)(1)b.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) ORC 3704.03(T)	Nitrogen Oxide (NOx) emissions shall not exceed 0.90 ton per month averaged over a rolling, 12-month period.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3), as effective 6/30/2008	Carbon Monoxide (CO) emissions shall not exceed 0.76 ton per month averaged over a rolling, 12-month period. Particulate Matter (PM) emissions shall not exceed 0.07 ton per month averaged over a rolling, 12-month period. Volatile Organic Compound (VOC) emissions shall not exceed 0.05 ton per month averaged over a rolling, 12-month period. See b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to CO, PM, and VOC from this air contaminant source since the calculated annual emission rate is less than 10 tons per year (TPY). See b)(2)b. below.
d.	OAC rule 3745-31-05(E) State-Only Enforceable Limitation to avoid Minor Source Modeling	Nitrogen Oxide (NOx) emissions shall not exceed 39.5 TPY for all five boilers combined as a rolling, 12-month summation. See c)(2) below.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.
f.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
g.	OAC rule 3745-18-06(A)	See c)(1) below.
h.	OAC rule 3745-110	See d)(4) below.
i.	40 CFR Part 60, Subpart Dc	See b)(2)d. below.

- (2) Additional Terms and Conditions
- a. These Best Available Technology (BAT) emission limits apply to CO, PM, and VOC emissions until the U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
 - b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the OhioSIP.
 - c. The ton per month emission limitations have been established at the maximum potential to emit. Therefore, record keeping and reporting are not needed to demonstrate compliance with these limits. See f)(1)(a) below.
 - d. So long as only natural gas is burned, these emissions units are not subject to the emission limits listed in 40 CFR Part 60, Subpart Dc. The only requirement is to maintain monthly records of fuel usage in accordance with 60.48c(g)(2).
- c) Operational Restrictions
- (1) The permittee shall burn only natural gas in this emissions unit.
 - (2) The permittee shall not burn more than 790 mmscf of natural gas per rolling, 12-months for all five boilers combined.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the following information for B004 through B008 combined:
 - a. the amount, in mmscf, of natural gas burned by all five emissions units combined;
 - b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation, in mmscf, of natural gas burned by all five emissions units combined.
 - (2) 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.
 - (3) The owner or operator of a small boiler must annually perform a tune-up and maintain, in a permanently bound log book or other format approved in writing by the director (see g)(1) below), the following information:
 - a. the date of the last tune-up;
 - b. the name, title and affiliation of the person who performed the tune-up and made any adjustments; and

- c. any other information which the Ohio environmental protection agency may require as a condition of approval of any permit for the boiler.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Cleveland DAQ.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for fuel usage in d)(2) above:
 - a. all days during which a fuel other than natural was burned in this emissions unit; and
 - b. any exceedance of the 790 mmscf of natural gas burned based upon a rolling, 12-month summation.
- (4) An exceedance of the visible particulate 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 permittee complies with the requirements of OAC rule 3745-15-06 and none of the conditions listed in OAC rule 3745-15-06(C) are applicable to the source.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
NOx: 0.90 ton per month averaged over a rolling, 12-month period
CO: 0.76 ton per month averaged over a rolling, 12-month period
PM: 0.07 ton per month averaged over a rolling, 12-month period
VOC: 0.05 ton per month averaged over a rolling, 12-month period

Applicable Compliance Method:
The monthly average emission limitations were established by multiplying the maximum annual natural gas usage rate for each boiler (215.56 mmscf/year) by the appropriate AP-42 emission factor located in Table 1.4-1 or 1.4-2 (lb of pollutant/mmscf) and dividing by 2,000 lbs/ton, then dividing by 12 months.
 - b. Emission Limitation:
NOx: 39.5 TPY for all five boilers combined as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the rolling, 12-month NO_x limitation shall be determined by multiplying the actual total annual amount (mmscf/yr) of natural gas burned by all five boilers combined per rolling, 12-month period by the NO_x emission factor (100 lbs NO_x/mmscf), located in Table 1.4-1 of AP-42, and dividing by 2,000 lb/ton.

c. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input

Applicable Compliance Method:

Compliance with the lb/mmBtu emission limitation shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (0.025 mmscf/hr) by the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.4 Table 1.4-2(7/98) emission factor for particulates (1.9 lbs PM/mmscf) and dividing by the maximum hourly heat input capacity of the emissions unit (25.1 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 5.

g) Miscellaneous Requirements

- (1) The permittee may retain electronic records of scanned (copied) original annual boiler tune-up reports within SIFCO's internal server system.
- (2) B004 installed August 2014
- (3) B005 installed August 2014
- (4) B006 installed November 2014
- (5) B007 installed November 2014
- (6) B008 installed January 2015
- (7) SIFCO will remain in compliance with the annual NO_x limitation provided natural gas consumption does not exceed 790 mmscf per rolling, 12-month summation for all five boilers combined.

NO_x: 790 mmscf/yr * 100 lbs NO_x/mmscf * 1 ton/2,000 lbs = 39.5 TPY NO_x