Ohio Environmental Protection Agency

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

9/10/2015

Certified Mail

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

Eric Marsh
RTI ALLOYS - MPD
1000 Warren Ave
PO BOX 269 MS#90
Niles, OH 44446-0269

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1576051869
Permit Number: P0116002
Permit Type: Initial Installation
County: Stark

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 Canton City Health Department at (330)489-3385or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: Canton

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
RTI ALLOYS - MPD

Facility ID:	1576051869
Permit Number:	P0116002
Permit Type:	Initial Installation
Issued:	9/10/2015
Effective:	9/10/2015
Expiration:	9/10/2025

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
RTI ALLOYS - MPD

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

B. Facility-Wide Terms and Conditions 8

C. Emissions Unit Terms and Conditions 10

1. Torch Cutting Emissions Group -- P006 (16A), P007 (17A), P008 (17B) 11

Authorization

Facility ID:	1576051869
Application Number(s):	A0049445
Permit Number:	P0116002
Permit Description:	Initial PTIO for three (3) torch cutting emissions units.
Permit Type:	Initial Installation
Permit Fee:	$1,200.00
Issue Date:	9/10/2015
Effective Date:	9/10/2015
Expiration Date:	9/10/2025

Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

RTI ALLOYS - MPD
208 15TH STREET, S.W.
CANTON, OH 44702

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:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

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: P0116002
Permit Description: Initial PTIO for three (3) torch cutting emissions units.

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

Group Name: torch cutting

Emissions Unit ID:	**P006**
Company Equipment ID:	16A Natural Gas Torch Cutter
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P007**
Company Equipment ID:	17A Natural Gas Torch Cutter
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P008**
Company Equipment ID:	17B Natural Gas Torch Cutter
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

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 beingpermanently shut down without first applying for and obtaining a permit pursuantto 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.

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. Torch Cutting Emissions Group -- P006 (16A), P007 (17A), P008 (17B)

Operations, Property and/or Equipment Description:

Natural Gas Torch Cutter for cutting titanium metal controlled via baghouse and vented inside the building.

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. None.

(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), as effective 11/30/2001 [Best Available Technology (BAT)]	The Best Available Technology (BAT) requirements have been determined to be equivalent to the requirements of OAC rule 3745-31-05(E) See b)(2)b.
b.	OAC rule 3745-31-05(E) June 30, 2008 [Voluntary Restrictions selected by permittee to avoid BAT]	Install localized hooding over each transferpoint designed to meet 98% capture efficiency of total particulate exhausting to a control device designed to meet 0.02 grains/dscfof total particulate emissions (PE). Particulate emissions (PE)shall not exceed 16.0 tons per year (stack and fugitive combined). See b)(2)a.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c..	OAC rule 3745-31-05(A)(3), as effective 12/01/06 [Less than 10 ton/yr BAT exemption]	See b)(2)c.
d..	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a six-minute average, from any stacks serving these emissions units, except as provided by rule.
e.	OAC rule 3745-17-07(B)(1) [Note: This emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08.]	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average
f.	OAC rule 3745-17-08(B)	The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). See b)(2)a.
g.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 2.58 lbs/hr. The emissions limitation established by this rule is less stringent than the emissions limitation established by OAC rule 3745-31-05(E).

(2) Additional Terms and Conditions

a. RACM and OAC rule 3745-31-05(E) requirements for this emissions unit have been determined to be the use of a localized hood over the emissions unit and the emissions vented to a baghouse at all times the emissions unit is in operation.

b. Best Available Technology (BAT) requirements for this emissions unit have been determined to equivalent to OAC rule 3745-31-05(E).

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA

approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

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

The BAT requirements under OAC rule 3745-31-03(A)(3) do not apply to PE/PM_{10} from this air contaminant source since the calculated annual emission rate is less than 10 tons/yr taking into account the voluntary restriction from OAC rule 3745-31-05(E).

c) Operational Restrictions

(1) The permittee shall operate and maintain the baghouse in accordance with the manufacturer's recommendations, instructions, and/or operating manuals. The baghouse shall be employed while any or all torch cutting stations are in operation to control particulate emissions.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range for the pressure drop across the baghouse shall be per the manufacturer’s recommendations.

(2) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse during operation of thisemissions unit. The monitoring equipment shall be installed, calibrated, operated, andmaintained in accordance with the manufacturer's recommendations, instructions, andoperating manual(s).

a. The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

b. Whenever the monitored value for the pressure drop deviates from the recommended range, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

i. the date and time the deviation began;

ii. the magnitude of the deviation at that time;

iii. the date the investigation was conducted;

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

v. the findings and recommendations.

c. In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the

control equipment within the acceptable range(s), unless the permittee determines that corrective action is not necessary.

i. The permittee shall maintain records of the following information for each deviation when it was determined corrective action was not necessary:

(a) the reasons for that determination; and

(b) the date and time the deviation ended.

ii. The permittee shall maintain records of the following information for each corrective action taken:

(a) a description of the corrective action;

(b) the date corrective action was completed;

(c) the date and time the deviation ended;

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

(e) the pressure drop readings immediately after the corrective action wasimplemented; and

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

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

(3) The permittee shall conduct periodic inspections of the baghouse system to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals. The periodic inspections of the baghouseshall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency.

(4) In addition to the periodic inspections described above, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the baghouse filter system while the emissions unit is shut down, and perform any needed maintenance and repair to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

(5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.

(6) In the event that the baghousesystem is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals, the baghouse system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the dry particulate filter system is not operating in accordance with such requirements.

(7) Notwithstanding the frequency of the monitoring and record keeping requirements specified in section d)(2), the permittee may reduce the pressure drop checks from daily readings to weekly readings if the following are met:

a. for 1 full quarter the facility's pressure drop records indicate no pressure drop readings outside the required range; and

b. the permittee continues to comply with all the record keeping and monitoring requirements specified in section d)(2).

The permittee shall revert to daily readings if any pressure drop readings are observed outside of the required range.

(8) The permittee shall perform daily checks when the emissions unit is in operation and when weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g. windows, doors, roof monitors) serving this emissions unit. The presence or absence of any fugitive particulate emissions shall be noted in operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

a. The color of the emissions;

b. Whether the emissions are representative of normal operations;

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

d. The total duration of any visible fugitive particulate emission incident; and

e. Any corrective actions taken to eliminate the visible fugitive particulate emissions.

(9) Notwithstanding the frequency of the monitoring and record keeping requirements specified in section d)(8), the permittee may reduce the visual observations from daily readings to weekly readings if the following are met:

a. for 1 full quarter the facility's visual observations indicate no visible emissions; and

b. the permittee continues to comply with all the record keeping and monitoring requirements specified in section d)(8).

The permittee shall revert to daily readings if any visible emissions are observed.

(10) The permittee shall maintain the record keeping required by terms d)(1) thru d)(9) above on site for a period of not less than five years.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The 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 in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date)when the pressure drop across the baghouse was outside of the acceptable range;

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

c. each incident of deviation described in e)(3)a. (above) where a prompt investigation was not conducted;

d. each incident of deviation described in e)(3)a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in e)(3)a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

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

a. <u>Emission Limitation:</u>

Install localized hooding over each transfer point designed to meet 98% capture efficiency of total particulate exhausting to a control device designed to meet 0.02 grains/dscf of total particulate emissions (PE).

Particulate emissions shall not exceed 16.0 TPY (stack and fugitive combined)

Applicable Compliance Method:

The 98% capture efficiency is based on engineering judgment per design of hooding by the permit writer. The 0.02 gr/dscf limitation is a design performance specification of the baghouse control device provided by permittee.

The TPY limit = Stack Emissions + Fugitive Emissions

= [(baghouse performance specification ×maximum air flow ×conversion factors)] + [(annual throughput ×emission factor) × (1- capture efficiency)]

= [0.02 grains/dscf×9600acf/min×lb/(7000 grains) × 60 min/hr×8760 hour/year× 1T/(2000 lb)]+[(4380 T ×0.1 lb/T ×(1-0.98)] = 7.23 + 8.76 = 16.0 TPY

Emission factor is from AP-42 12.5 for machine scarfing of 0.1 PE/ton material processed. The maximum air flow and annual throughput were supplied within the permit application. It was assumed that acfm = dscf for the calculation.

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

b. Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with 40CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

Visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows and roof monitors.

d. Emission Limitation:

Particulate emissions (PE) shall not exceed 2.58 lb/hr, pursuant to OAC rule 3745-17-11(B)(1). This limitation is less stringent than the limitation pursuant to OAC rule 3745-31-05(E).

Paragraph (B)(1) of OAC rule 3745-17-11 applies because the source is located in Stark County. Emission limitations can be determined from either Table I or Figure II, with the more stringent of the two to be used.

Table I is based on maximum process weight rate (P) which is equal to 1,000 lbs/hr per the permit application. The Table 1 allowable emission rate becomes 2.58 lbs/hr.

Figure II is based on maximum uncontrolled particulate emissions rate, which in this case is calculated by dividing the particulate emission limit by the control efficiency of the control equipment (baghouse) of 99% (both provided by permittee) as shown below.

The hourly stack emission rate is equal to 0.02 grains/dscf×9600acf/min×lb/(7000 grains) × 60 min/hr = 1.65 lb/hr

(1.65 lb/hr) ÷ (1 – 0.99) = 165 lb PE/hr

The Figure II value calculated above, 165 lb PE/hr, was used to determine the allowable emissions rate from Figure II using curve P-1 of 15 lb/hr.

The Table 1 value is more stringent than Figure II, so it becomes the emission limitation.

As can be seen above, the hourly rate of 1.65 lb/hr as derived from the 0.02 gr/dscf emission limitation pursuant to OAC rule 3745-31-05(E) is less than 2.58 lb/hr, so it is more stringent.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) None.