

Facility ID: 1318008393 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1318008393 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Brass Milling Line Controlled by Three Baghouses	OAC rule 3745-31-05(A)(3) (PTI 13-04248 issued 2/19/04)	PM/PM10 emissions shall not exceed 0.01 gr/dscf, 0.6 lbs/hr and 2.628 tons per year (tpy) for all three baghouses
		Lead emissions shall not exceed 0.012 lb/hr and 0.0526 tpy.
	OAC rule 3745-17-11(A)(2)	Visible stack particulate emissions (PE) shall not exceed 10% opacity, as a 6-minute average.
	OAC rule 3745-17-07(A)(1)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
Material Handling Operation - dumping brass skimmings into mill hopper	OAC rule 3745-31-05(A)(3) (PTI 13-04248 issued 2/19/04)	The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
		PM10 emissions shall not exceed 0.00021 tpy
		PM emissions shall not exceed 0.00044 tpy
	OAC rule 3745-17-07(B)(1)	The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
	OAC rule 3745-17-08(B)	Visible PE of fugitive dust shall not exceed 5% opacity, as a six-minute average.
		The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
		The control measures specified by this rule are equivalent to the control measures established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) The permittee shall employ best available control measures for the material handling operation(s) for the purpose of ensuing compliance with the applicable requirements. In accordance with the permittee's permit application, the permittee has committed using three baghouses to control the brass milling operation.

The terms and conditions outlined in the above paragraph shall not prohibit the permittee from employing alternative control measures to ensure compliance.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible particulate emissions shall be noted in an operations log. If visible 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 the abnormal emissions;
 - d. the total duration of any visible particulate emission incident; and
 - e. any corrective actions taken to eliminate the visible particulate emissions.
2. The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality (CDAQ), modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed from the from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the CDAQ by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Limitation:

PM/PM10 emissions shall not exceed 0.01 gr/dscf and 0.6 lb/hr from all three baghouses

Applicable Compliance Method:

Compliance with the lbs/hr limit may be determined by multiplying the maximum outlet concentration of 0.01 gr/dscf by the maximum volumetric air flow (7,000 acfm), and the appropriate conversion factors of 1 dscf/1 acf, 60 minutes/hr, and divide by 7000 grains/lb. PE is assumed to be equivalent to PE10. If required, compliance shall be determined by performing a stack test using Methods 1 - 5 of 40 CFR Part 60, Appendix A.

Emissions Limitation:

PE/PM10 emissions shall not exceed 2.628 tpy

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours/year and dividing by 2,000 lbs. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the hourly emission limitation.

Emission Limitation:

Lead emissions shall not exceed 0.012 lb/hr

Applicable Compliance Method:

If required, U.S. EPA Method 12 or 29, whichever is applicable, shall be used to show compliance with the hourly emission rate.

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

Emission Limitation:

Lead emissions shall not exceed 0.0526 tpy

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours/year and dividing by 2,000 lbs. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the hourly emission limitation.

Emissions Limitation:

Visible PE from the stacks of the three baghouses shall not exceed 10% opacity as a 6-minute average.

Applicable Compliance Method:

If required, visible particulate emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

Emission Limitation:

PM10 emissions shall not exceed 0.00021 tpy

Applicable Compliance Method

Compliance shall be determined by using the following formula:

$$(\text{Maximum input t/hr})(\text{AP-42 5th ed., Table 11.19.2-2 emission factor})(8,760 \text{ hrs/yr})(1 \text{ t}/2000 \text{ lbs})$$

$$(3 \text{ tons/hr})(0.000016 \text{ lb PM10/ton})(8760 \text{ hrs/yr})(1 \text{ t}/2000 \text{ lbs}) = 0.00021 \text{ tpy}$$

Emission Limitation:

PM emissions shall not exceed 0.00044 tpy

Applicable Compliance Method:

Compliance shall be determined by the following formula:

$$\text{PM emissions} = (\text{PM10 emissions})(2.1) \\ (0.00021 \text{ t/hr PM10})(2.1)(8760 \text{ hrs/yr})(1 \text{ t}/2000 \text{ lbs}) = 0.00044 \text{ tpy}$$

Emissions Limitation:

Visible particulate emissions of fugitive dust shall not exceed five percent opacity, as a six-minute average

Applicable Compliance Method:

If required, visible fugitive particulate emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

F. **Miscellaneous Requirements**

1. None