Ohio Environmental Protection Agency

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

1/14/2016

Certified Mail

Bradley Ahbe
Canton Drop Forge
4575 Southway Street S.W.
Canton, OH 44706-1995

Facility ID: 1576000073
Permit Number: P0104470
County: Stark

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 10/21/2015. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. 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 permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

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

and

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael E. Hopkins, P.E
Assistant ChiefPermitting Section, DAPC

Cc: Canton City Health Department

Response to Comments

Facility ID:	1576000073
Facility Name:	Canton Drop Forge
Facility Description:	Steel forging operation using forge hammers
Facility Address:	4575 Southway Street S.W. Canton, OH 44706-1995 Stark County
Permit:	P0104470, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Canton Repository on 11/03/2015. The comment period ended on 12/03/2015.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

The following comments were submitted by the facility, Canton Drop Forge, and were received on November 13, 2015, and are the only comments received:

1. Topic: Recordkeeping and Reporting requirements

a. **Comment:** Facility requested the removal of the monthly reporting requirement of die lube, kerosene, and any other liquid material usage in the forge shop.

Response: The reporting requirement for these items was changed to yearly and will be included in the Fee Emissions Report (FER) as an attachment. Even though monthly reporting was required in the previous permit, annual totals are all that are needed to determine if usage is consistent and to report emissions.

2. Topic: Emission Calculations

a. **Comment:** The source of the particulate emission factor for emission units P033, P034, P035, P036, P045, and P051 was questioned since it was removed from the USEPA website.

Response: After discussion with the facility, it was decided to leave the emission factor unchanged.

3. Topic: Enforcement authority

a. **Comment:** Facility questioned the terms declared as state only enforceable in P045 and P051 and noted they were inconsistent with previous permits.

Response: No changes were made to this Title V permit. These terms were declared as state only enforceable in this permit for accuracy. The Permit-to-Installs (PTIs) being incorporated into this Title V permit for P045 and P051 are 15-01645 and P0110558 respectively. 15-01645 specifies Ohio Administrative Code (OAC) rule 3745-31-05(C) effective 12/01/2006 as a voluntary restriction to avoid Best Available Technology (BAT). Per this rule paragraph, this is state only enforceable, but was inappropriately included in the state and federal enforceable section of 15-01645. It has been updated for accuracy in this Title V permit version. P0110558 specified BAT requirements that were also voluntary restrictions after the less than 10 ton per year BAT exemption is effective. This Title V permit updated the expression of these terms to make this clear that a voluntary restriction was taken. As indicated, any voluntary restrictions to avoid BAT are state only enforceable. Administrative Modification to 15-01645 and P0110558 was issued on 12/23/2015 as PTI P0120066. Now the PTI and this Title V permit have consistent terms.

4. Topic: Format correction

a. **Comment:** The format of the requirements from 40 CFR Part 63 Subpart XXXXXX should be changed from 63.11519(A) and (B) [uppercase letters] to 63.11519(a) and (b) [lower case letters].

Response: This correction will be made to be consistent with numbering format from Subpart XXXXXX.

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Canton Drop Forge

Facility ID:	1576000073
Permit Number:	P0104470
Permit Type:	Renewal
Issued:	1/14/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Canton Drop Forge

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Ohio Environmental Protection Agency

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Authorization

Facility ID:	1576000073
Facility Description:	Steel forging operation using forge hammers
Application Number(s):	A0036327, A0048736, A0053056, A0053223
Permit Number:	P0104470
Permit Description:	Renewal Title V permit including natural gas/oil boilers, furnaces, forging hammers, machining operations (grinding and cleaning) and other ancillary equipment used in the production of steel forgings.
Permit Type:	Renewal
Issue Date:	1/14/2016
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0100925

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

Canton Drop Forge
4575 Southway Street S.W.
Canton, OH 44706-1995

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 a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Canton City Health Department. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Canton City Health Department. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Canton City Health Department by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable

requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Canton City Health Department unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

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

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

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

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible 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 paragraph (E) of OAC rule 3745-77-03.

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

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

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

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

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

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Canton City Health Department) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms

and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Canton City Health Department with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Canton City Health Department as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

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

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11)))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theCanton City Health Department.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Canton City Health Department. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention RequirementsUnder State Law Only

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

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Canton City Health Department in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Canton City Health Department must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air

Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Canton City Health Department, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

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

   a) None.

2. The following terms apply to emission units P058-P070:

   a) The permittee shall:

      (1) maintain annual records of the amount (in gallons) of cylinder oil, die lube, kerosene, and any other liquid material, employed in emissions units P058 – P070;

      (2) report the annual amount (in gallons) of cylinder oil, die lube, kerosene, and any other liquid material, employed in emissions units P058 – P070 as an attachment to the Fee Emissions Report (FER) required to be submitted by term A.8 in the standard terms and conditions.

      [Authority for term: OAC rule 3745-77-07(C)(1)]

   b) The permittee shall perform weekly checks, when the emissions units are in operation and when the weather conditions allow, for any visible particulate emissions from the process steam exhaust stack serving emissions P058 – P070. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

      (1) the location and color of the emissions;

      (2) whether the emissions are representative of normal operations;

      (3) if the emissions are not representative of normal operations, the cause of the abnormal emissions;

      (4) the total duration of any visible emission incident; and

      (5) any corrective actions taken to minimize or eliminate the visible emissions.

      If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the visible emission check until the incident has ended. The observer may indicate that the visible emission 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 3745-77-07(C)(1)]

c) The permittee shall submit quarterly written reports that identify the following, at a minimum:

(1) an identification of all days during which any visible particulate emissions were observed from the stack serving emissions units P058 – P070; and

(2) a description of any corrective actions taken to minimize or eliminate the visible particulate emissions.

The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous 3-month period.

[Authority for term: OAC rules 3745-15-03(C) and 3745-77-07(A)(3)(c)]

3. The following insignificant emissions units at this facility must comply with all applicable State and Federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

a) F001 – Plant Roadways and Parking Areas [OAC 3745-17-07(B)(5), OAC 3745-17-08(B)];

b) L002 – General maintenance parts washer containing mineral spirits; surface dimensions 5' x 32" [OAC 3745-21-09(O)];

c) L003 – General maintenance parts washer containing mineral spirits; surface dimensions 5' x 32" [OAC 3745-21-09(O)];

d) P025 – Car type furnace OF07, natural gas only, rated at 4.8 MMBtu/hr [OAC 3745-17-07(B), OAC 3745-17-08(B)];

e) P027 – Hagan pusher type quench and draw furnace OF08, natural gas only rated at 7.68 MMBtu/hr [OAC 3745-17-07(B), OAC 3745-17-08(B)];

f) P040 – Hagan pusher type quench and draw furnace OF09, natural gas only rated at 9.55 MMBtu/hr [OAC 3745-17-07(B) , OAC 3745-17-08(B)];

g) P048 – Rotary Furnace FR12, natural gas only, rated at 6.5 MMBtu/hr [OAC 3745-17-07(B) , OAC 3745-17-08(B)];

h) P052 -- Shot Blast Unit BHOB12 - 34 cubic foot Wheelabrator Super Tumblast II [40 CFR Part 63, Subpart XXXXXX]

i) P053 -- Wheelabrator 96" Swing Table Blast Unit (OB15) [40 CFR Part 63, Subpart XXXXXX]

j) P055 – Heat Treat Furnace OF16 , natural gas only, rated at 7.5 MMBtu/hr [OAC 3745-17-07(B), OAC 3745-17-08(B)];

k) P056 – Heat Treat Furnace OF11 , natural gas only, rated at 7.7 MMBtu/hr. [OAC 3745-17-07(B), OAC 3745-17-08(B)];

l) P058 – Forging Hammer Location A [OAC 3745-17-07(A), OAC 3745-17-07(B), OAC 3745-17-08(B), OAC 3745-17-11, OAC 3745-21-09, term B.2.];

m) P059 – Forging Hammer Location B [OAC 3745-17-07(A), OAC 3745-17-07(B), OAC 3745-17-08(B), OAC 3745-17-11, OAC 3745-21-09, term B.2.];

n) P060 – Forging Hammer Location C [OAC 3745-17-07(A), OAC 3745-17-07(B), OAC 3745-17-08(B), OAC 3745-17-11, OAC 3745-21-09, term B.2.];

o) P061 – Forging Hammer Location D [OAC 3745-17-07(A), OAC 3745-17-07(B), OAC 3745-17-08(B), OAC 3745-17-11, OAC 3745-21-09, term B.2.];

p) P062 – Forging Hammer Location E [OAC 3745-17-07(A), OAC 3745-17-07(B), OAC 3745-17-08(B), OAC 3745-17-11, OAC 3745-21-09, term B.2.];

q) P063 – Forging Hammer Location F [OAC 3745-17-07(A), OAC 3745-17-07(B), OAC 3745-17-08(B), OAC 3745-17-11, OAC 3745-21-09, term B.2.];

r) P064 – Forging Hammer Location G [OAC 3745-17-07(A), OAC 3745-17-07(B), OAC 3745-17-08(B), OAC 3745-17-11, OAC 3745-21-09, term B.2.];

s) P065 – Forging Hammer Location H [OAC 3745-17-07(A), OAC 3745-17-07(B), OAC 3745-17-08(B), OAC 3745-17-11, OAC 3745-21-09, term B.2.];

t) P066 – Forging Hammer Location I [OAC 3745-17-07(A), OAC 3745-17-07(B), OAC 3745-17-08(B), OAC 3745-17-11, OAC 3745-21-09, term B.2.];

u) P067 – Forging Hammer Location J [OAC 3745-17-07(A), OAC 3745-17-07(B), OAC 3745-17-08(B), OAC 3745-17-11, OAC 3745-21-09, term B.2.];

v) P068 – Forging Hammer Location K [OAC 3745-17-07(A), OAC 3745-17-07(B), OAC 3745-17-08(B), OAC 3745-17-11, OAC 3745-21-09, term B.2.];

w) P069 – Forging Hammer Location L [OAC 3745-17-07(A), OAC 3745-17-07(B), OAC 3745-17-08(B), OAC 3745-17-11, OAC 3745-21-09, term B.2.]; and

x) P070 – Forging Hammer Location M [OAC 3745-17-07(A), OAC 3745-17-07(B), OAC 3745-17-08(B), OAC 3745-17-11, OAC 3745-21-09, term B.2.].

4. The following emissions units contained in this permit are subject to the following National Emission Standards for Hazardous Air Pollutants (NESHAP) rules:

a) 40 CFR Part 63, Subpart JJJJJJ, NESHAP for Area Sources of Industrial, Commercial, and Institutional Boilers: B002 and B003.

b) 40 CFR Part 63, Subpart XXXXXX, NESHAP for Area Sources of Metal Fabrication and Finishing Source Nine Categories: P033, P034, P035, P036, P045, P051, P052, and P053.

The U.S. EPA is responsible for the administration of the requirements of this rule at this time. It should be noted that the enforcement authority of the GACT requirements is not delegated to Ohio EPA at the time of this permit processing. The complete requirements of this rule (including the Part 63 General

Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website http://www.ecfr.gov or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

5. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25, since they have one or more air contaminant sources with 0.25 tons per day of a criteria pollutant. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

6. Facility-wide HAP Emission Limitations:

   The permittee has requested voluntary emission limitations pursuant to OAC rule 3745-77-07(B)(1) in order to qualify as a synthetic minor source for Hazardous Air Pollutants (HAPs) and avoid the requirements of 40 CFR Part 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. Accordingly, this permit establishes the following federally enforceable restrictions:

   a) The emissions of HAPs from all HAP-emitting sources at the facility shall not exceed 9.9 tons per year for any individual HAP, and 24.9 tons per year for total combined HAPs, based on a rolling, 12-month summation of the monthly emissions.

   b) HAP emissions for the facility shall include any deminimis air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources, as defined in OAC rule 3745-31-03(A), installed subsequent to the issuance of this permit.

   c) Existing HAP-emitting emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the emissions, upon issuance of this permit.

   [Authority for term: OAC rule 3745-77-07(A)(1) and 3745-77-07(B)]

7. Facility-Wide Monitoring and Record Keeping Requirements:

   a) This permit establishes federally enforceable emission limitations for HAPs as set forth in Section 6. For the purpose of establishing compliance with the combined HAP emission limitations in Section 6, the permittee shall monitor and record necessary information to calculate HAP emissions from all HAP-emitting sources.

   b) For calendar years with total combined HAPs equal to or less than 5.0 tons per year, the permittee shall not be required to maintain 12-monthly rolling records.

   c) If the previous calendar year total combined HAPs is greater than 5.0 tons per year, the permittee shall be required to maintain 12-monthly rolling records for at least 12 months in the current year, until such time the total combined HAPs is equal to or less than 5.0 tons per year

   [Authority for term: OAC rule 3745-77-07(C)(1)]

8. Reporting Requirements

a) 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.

b) The permittee shall submit quarterly deviation (excursion) reports that identify the following, at a minimum:

(1) All exceedances of the rolling, 12-month summation emission limitation for total individual or combined HAP emissions

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements specified in Part A., - General Standard Terms and Conditions, of this permit.

[Authority for term: OAC rules 3745-15-03(C) and 3745-77-07(A)(3)(c)]

c) The permittee shall include the actual facility-wide total individual and combined HAP emissions from all HAP-emitting sources at the facility in the FER (Fee Emissions Report submitted per OAC rule 3745-78-02). These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

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

d) The permittee shall update Air Services with any de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources, as defined in OAC rule 3745-31-03(A)(1) installed subsequent to the issuance of this permit. These updates shall be submitted along with the FER by April 15 of each year and shall cover the previous calendar year.

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

9. Testing Requirements

a) None.

C. Emissions Unit Terms and Conditions

1. L001, Die Washing

Operations, Property and/or Equipment Description:

Die washing area for cleaning of dies using manual application of kerosene or diesel fuel and hand held steam jet.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	None	None. See b)(2)a.

(2) Additional Terms and Conditions

a. Previously subject to OAC rule 3745-21-07(G)(2); however, OAC rule 2745-21-07 has been revised (2/18/2008) and rule 3745-21-07(G)(2) was rescinded.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) <u>For informational purposes only:</u>

Potential to Emit calculation is:

Diesel usage results in higher emissions than kerosene usage due to a higher density. Maximum usage of either material, or combination of materials, is 0.5 gal/hr.

0.5 gal diesel/hr X 8,760 hrs/yr X 6.93 lbs VOC/gal X 1 ton/2,000 lbs = 15.18 tons VOC/year.

lb VOC / day = 0.5 X 24 X 6.93 = 83.16 lbs VOC / day (NOT de minimis)

diesel density = 6.93 lbs VOC/gal, assumes 100% VOC

kerosene density = 6.67 lbs VOC/gal, assumes 100% VOC

OC assumed equal to VOC.

2. P036, Shot Blaster OB08

Operations, Property and/or Equipment Description:

Shot Blaster OB08 - Wheelabrator Super II Tumblast shot cleaner with a maximum process weight rate of 12.5 tons per hour controlled by a baghouse (SB2).

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 63, Subpart XXXXXX (40 CFR 63.11514 – 63.11523) [In accordance with 40 CFR 63.11514, this emissions unit is an existing affected source engaged in the production of iron and steel forgings that conducts dry abrasive blasting.]	This emission unit shall comply with all the applicable requirements of 40 CFR Part 63, Subpart XXXXXX See b)(2)b. and c)(1) below.
b.	40 CFR Part 63, Subpart A (40 CFR 63.1-16)	Table 1 to Subpart XXXXXX of 40 CFR Part 63 – Applicability of General Provisions
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule. This stack visible particulate emissions limitation established by this rule is less stringent than the stack visible particulate emissions limitation established by OAC rule 3745-17-08(B).
d.	OAC rule 3745-17-07(B)	Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
e.	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. and c)(1). below.
f.	OAC rule 3745-17-11(B)	17.8 pounds per hour of particulate emissions See c)(1). below. This emissions limitation established by this rule is less stringent than the emissions limitation established by OAC rule 3745-17-08(B).
g.	40 CFR Part 64 (40 CFR 64.1 – 64.10) [Compliance Assurance Monitoring (CAM)]	See c)(1), d)(1), d)(3) – d)(6), and e)(2) – e)(3).

(2) Additional Terms and Conditions

a. The fabric filter control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions (whichever is less stringent) from the exhaust stack of this emissions unit.

b. The permittee shall comply with the applicable requirements under 40 CFR Part 63, Subpart XXXXXX, including the following sections:

63.11516(a)(2)(i)-(ii)	You must capture emissions and vent them to a filtration control device. You must operate the filtration control device according to manufacturer's instructions, and you must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devicesYou must implement the management practices to minimize emissions of MFHAP as specified in paragraphs (a)(2)(ii)(A) through (C) of this section.
63.11516(a)(2)(ii)(A)	Implement measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions
63.11516(a)(2)(ii)(B)	Enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials
63.11516(a)(2)(ii)(C)	Operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions

c) Operational Restrictions

(1) The emissions from this emissions unit shall be vented to the fabric filter at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible fugitive particulate emissions from any non-stack egress point (e.g. 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 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 emission incident; and

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the check until the incident has ended. The observer may indicate that the visible emission 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 3745-77-07(C)(1) to ensure compliance with 3745-17-07 and 40 CFR Part 64]

(2) The permittee shall comply with the applicable requirements under 40 CFR Part 63, Subpart XXXXXX, including the following sections:

63.11519(c)(1)	Each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report. Records of the applicability determinations as in §63.11514(b)(1) through (5).
63.11519(c)(4)	Maintain a record of the manufacturer's specifications for the control devices used to comply with §63.11516(a)(2)

63.11519(c)(13)	Maintain a record of the manufacturer's instructions for the equipment operated used to comply with §63.11516(a)(2)(ii)(B)

(3) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the baghouse controlling this emission unit are:

a. the visible emissions from the baghouse stack with an indicator level of the limitation specified in b)(1)c. and monitoring frequency in accordance with the monitoring and recordkeeping requirements specified in d)(1); and

b. the fugitive visible emissions from the building with an indicator level of the limitation specified in b)(1)d. and monitoring frequency in accordance with the monitoring and recordkeeping requirements specified in d)(1).

The CAM performance indicators are indicative of the operation of the baghouse and capture system and were chosen as a reasonable and practical monitoring frequency. The CAM performance indicator were established in accordance with facility recommendations and will be verified and/or adjusted during future emissions testing performed as required by this permit.

When a performance indicator shows operation outside the indicator range, the permittee shall take corrective actions to restore operation of the emissions unit(s) and/or control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operation(s) returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse(s) shall not be configured to have bypass capability.

If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8. In addition, a QIP will be developed and implemented if the threshold of one occurrence per quarter is exceeded.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(4) Baghouse operating parameters shall be re-verified as a result of any changes to the operating conditions of the baghouses or emissions units. In addition to periodic monitoring of the baghouse operating parameters, the permittee shall also have an Operating, Maintenance, and Inspection (OM&I) program for the baghouse and capture system.

Based on the results of the (OM&I) program, repairs to the baghouse and capture system shall be made as needed. If the current CAM indicators and/or the baghouse and capture system (OM&I) program are considered inadequate, the permittee shall develop a Quality Improvement Plan (QIP).

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(5) The permittee shall maintain necessary parts for routine repairs of the monitoring equipment.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7(b)]

(6) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance, or the results of compliance or performance testing document a need to modify the existing indicator levels, the permittee shall promptly notify Canton City Health Department, Air Pollution Control Division, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions (i.e. levels), modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by a means of a minor permit modification.

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

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.

[Authority for term: OAC rule 3745-15-03(A)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following, at a minimum:

a. 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.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements specified in Part A., Standard Terms and Conditions, of this permit.

[Authority for term: OAC rule 3745-15-03(C), and 3745-77-07(A)(3)(c), and 40 CFR 64.9(a)]

(3) The permittee shall submit semiannual written reports that, at a minimum:

a. identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and/or any non-stack egress point serving this emissions unit; and

b. describe any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible fugitive particulate emissions.

The semiannual reports shall be submitted in accordance with the reporting requirements specified in Part A., Standard Terms and Conditions, of this permit.

[Authority for term: OAC rule 3745-15-03(A) and 3745-77-07(A)(3)(c), and 40 CFR 64.9(a)]

(4) The permittee shall comply with the applicable reporting requirements listed in 40 CFR Part 63, Subpart XXXXXX in §63.11519(a) and (b).

f) Testing Requirements

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

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

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

<u>Applicable Compliance Method:</u>

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

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

20% opacity as a 3-minute average, for fugitive emissions

<u>Applicable Compliance Method:</u>

If required, the permittee shall demonstrate compliance with this emission limitation through visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

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

The fabric filter control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions (whichever is less stringent) from the exhaust stack of this emissions unit.

Applicable Compliance Method:

If required, compliance with the requirement for no visible particulate emissions from the exhaust stack shall be determined in accordance with U.S. EPA Method 22. If opting to comply with the outlet particulate emissions rate, if required, compliance with the 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the stack shall be determined in accordance with U.S. EPA Methods 1 through 5, as appropriate.

d. Emission Limitation:

17.8 pounds per hour of particulate emissions

Applicable Compliance Method:

The uncontrolled mass rate of emissions (UMRE) shall be used to determine the allowable emission limitation from Figure II of OAC rule 3745-17-11. The UMRE was calculated using an emission factor of 16.16 pound filterable particulate per ton of metal produced for shot blasting (captured and uncontrolled plus uncaptured and uncontrolled) found in "Emission Estimation Protocol for Iron and Steel Foundries" by RTI International dated December, 2012 in Table 6-2.

Multiplying this factor by the maximum process weight rate of 12.5 tons steel processed per hour gives a total UMRE of 202.0 pounds per hour of particulates. Using Figure II, the allowable emission rate (A) in pounds per hour is determined from curve P1 and the following equation:

$A = 0.5782 \times (U^{0.6456})$,where "U" is the UMRE

$A = 0.5782 \times (202^{0.6456})$ = 17.8 lbs/hr

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC Rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-77-07(A)(1)]

g) Miscellaneous Requirements

(1) None.

3. P041, Rotary Furnace FR11

Operations, Property and/or Equipment Description:

17-foot, natural gas fired Hagan rotary furnace, 21.56 MMBtu/hr heat input, (fugitive emissions only)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0120180 issued 01/11/2016)	PE shall not exceed 0.02 lb per MMBtu and 1.9 tons per year (TPY) SO_2 emissions shall not exceed 0.15 lb per MMBtu and 14.2 TPY. See b)(2)a. and c)(1) below.
b.	OAC rule 3745-17-07(B)	Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
c.	OAC rule 3745-17-08(B)	See b)(2)b. below.
d.	OAC rule 3745-17-10	Not applicable. See b)(2)c. below.
e.	OAC rule 3745-18-82(B)(4)-(5)	See b)(2)d. below.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) has been determined to be the use of natural gas only as fuel, as required per term c)(1), to achieve compliance with the emission limitations listed in b)(1)a.

b. The process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process. Therefore, the only source of particulate emissions is from fuel burning. Natural gas burning is known to be inherently clean in regards to particulate emissions. Therefore, by using only natural gas as fuel, as required in term c)(1), the reasonably available control measure requirements specified in OAC rule 3745-17-08(B) are satisfied.

c. These rules apply to sources in which fuel is burned for the primary purpose of producing heat or power by indirect heat transfer per OAC rule 3745-17-10(A). This emission unit does not meet that definition since it burns fuel for the purpose of producing heat by direct heat transfer to the process materials (steel billets) employed in this emission unit.

d. These rules apply to fuel oil consumption and content. This emission unit has removed its capability to use any fuel oil. Therefore, compliance with these rules is assumed.

c) Operational Restrictions

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

[Authority for term: PTI P0120180 issued on 01/11/2016 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: PTI P0120180 issued on 01/11/2016 and OAC rule 3745-77-07(C)(1)]

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.

[Authority for term: OAC rule 3745-15-03(A)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following, at a minimum:

a. each day when a fuel other than natural gas was burned in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements specified in Part A., Standard Terms and Conditions, of this permit.

[Authority for term: PTI P0120180 issued on 01/11/2016, OAC rule 3745-15-03(C) and 3745-77-07(A)(3)(c)]

f) Testing Requirements

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

a. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

b. Emission Limitation:

PE shall not exceed 0.02 lb per MMBtu

Applicable Compliance Method:

The emission limitation was established as BAT in the original permit (PTI 15-291 issued on 01/23/1986) based on the permittee application.

For ongoing compliance, using natural gas provides the following:

PE (lb/MMBtu) = EF X conversion factor

PE = (7.6 lb/10^6 scf) X (10^6scf/1020 MMBtu) = 0.007 lb/MMBtu

Emission factor (EF) from AP-42 table 1.4-2 (Natural Gas combustion)

0.007 lbs/MMBtu< 0.02 lb/MMBtu, therefore, compliance is assumed.

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

c. Emission Limitation:

PE shall not exceed 1.9 TPY

Applicable Compliance Method:

This emission limitation was established by multiplying the allowable lb/MMBtu emission limitation by the maximum firing rate of 21.56 MMBtu/hr, then by the maximum annual hours of operation (8760 hours per year), and then dividing by 2000 pounds per ton. Therefore, compliance with this emission limitation will be satisfied provided that the permittee complies with the lb/MMBtu emission limitation.

d. Emission Limitation:

SO_2 emissions shall not exceed 0.15 lb per MMBtu

Applicable Compliance Method:

The emission limitation was established as BAT in the original permit (PTI 15-291 issued on 01/23/1986) based on the permittee application.

For ongoing compliance, using natural gas provides the following:

SO_2 (lb/MMBtu) = EF X conversion factor

SO_2 = (0.6 lb/10^6 scf) X (10^6scf/1020 MMBtu) = 0.0006 lb/MMBtu

Emission factor (EF) from AP-42 table 1.4-2 (Natural Gas combustion)

0.0006 lbs/MMBtu< 0.15 lb/MMBtu, therefore, compliance is assumed.

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

e. Emission Limitation:

SO_2 emissions shall not exceed 14.2 TPY

Applicable Compliance Method:

This emission limitation was established by multiplying the allowable lb/MMBtu emission limitation by the maximum firing rate of 21.56 MMBtu/hr, then by the maximum annual hours of operation (8760 hours per year), and then dividing by 2000 pounds per ton. Therefore, compliance with this emission limitation will be satisfied provided that the permittee complies with the lb/MMBtu emission limitation.

[Authority for term: PTI P0120180 issued on 01/11/2016 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

4. P045, Shot Blaster OB11

Operations, Property and/or Equipment Description:

Shot Blaster OB11 - Wheelabrator Super II Tumblast shot cleaner, 34 cubic feet, with a maximum process weight rate of 12.5 tons per hour controlled by a baghouse (SB2).

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) b)(1)a.

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 (PTI P0120066 issued 12/23/2015)	The Best Available Technology (BAT) requirements have been determined to be equivalent to 40 CFR Part 63, Subpart XXXXXX (40 CFR 63.11514 – 63.11523) See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008 (PTI P0120066 issued 12/23/2015) [Less than 10 tpy BAT exemption]	The Best Available Technology (BAT) requirements under OAC rule 3745-31-03(A)(3) do not apply to 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) See b)(2)b.
c.	OAC rule 3745-31-05(E) June 30, 2008 (Voluntary Restrictions to avoid BAT from PTI P0120066 issued 12/23/2015)	The minimum control efficiency of the fabric filter dust collection device (baghouse) shall be 99.0%. This emission unit shall operate with 100% capture efficiency. See c)(1).
d.	40 CFR Part 63, Subpart XXXXXX (40 CFR 63.11514 – 63.11523) [In accordance with 40 CFR 63.11514, this emissions unit is an existing affected source engaged in	This emission unit shall comply with all the applicable requirements of 40 CFR Part 63, Subpart XXXXXX See b)(2)c.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	the production of iron and steel forgings.]	
e.	40 CFR Part 63, Subpart A (40 CFR 63.1-16)	Table 1 to Subpart XXXXXX of 40 CFR Part 63 – Applicability of General Provisions
f.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
g.	OAC rule 3745-17-11(B)	17.7 lbs PE per hour This emissions limitation established by this rule is less stringent than the emissions as a result of the control requirements established by OAC rule 3745-31-05(C).

(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 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 Ohio SIP.

c. The permittee shall comply with the applicable requirements under 40 CFR Part 63, Subpart XXXXXX, including the following sections:

63.11516(a)(2)(i)-(ii)	You must capture emissions and vent them to a filtration control device. You must operate the filtration control device according to manufacturer's instructions, and you must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices You must implement the management practices to minimize emissions of MFHAP as specified in paragraphs (a)(2)(ii)(A) through (C) of this section.

63.11516(a)(2)(ii)(A)	Implement measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions
63.11516(a)(2)(ii)(B)	Enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials
63.11516(a)(2)(ii)(C)	Operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions

c) Operational Restrictions

(1) The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation.

[Authority for term: PTI P0120066 issued on 12/23/2015, 40 CFR 63.11516(a)(2), and OAC rule 3745-77-07(A)(1)]

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 established for the pressure drop across the baghouse is between 0.5 to 8 inches of water, when the emissions unit is in operation.

[Authority for term: PTI P0120066 issued on 12/23/2015 and OAC rule 3745-77-07(C)(1)]

(2) 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 a weekly basis when the emissions unit is operating. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer’s recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range or limit 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 the corrective action was completed;

h. the date and time the deviation ended;

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

j. the pressure drop and flow rate 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.

This range or limit for the pressure drop is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Canton City Health Department, Air Pollution Control Division (CCHD, A PCD). The permittee may request revisions to the permitted range or limit for the pressure drop based upon information obtained during future performance tests 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: PTI P0120066 issued on 12/23/2015 and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall perform weekly checks when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any stack serving this emissions unit. The presence or absence of any visible emissions observed during any of the daily checks required shall be noted in an operations log. If visible emissions are observed, the permittee shall also document 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 emission incident; and

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the check until the incident has ended. The observer may indicate that the visible emission 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: PTIP0120066issued on 12/23/2015 and OAC rule 3745-77-07(A)(1)]

(4) The permittee shall comply with the applicable requirements under 40 CFR Part 63, Subpart XXXXXX, including the following sections:

63.11519(c)(1)	Each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report. Records of the applicability determinations as in §63.11514(b)(1) through (5).
63.11519(c)(4)	Maintain a record of the manufacturer's specifications for the control devices used to comply with §63.11516(a)(2)
63.11519(c)(13)	Maintain a record of the manufacturer's instructions for the equipment operated used to comply with §63.11516(a)(2)(ii)(B)

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.

[Authority for term: OAC rule 3745-15-03(A)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following, at a minimum:

a. each period of time (start time and date, and end time and date) when 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 "a" (above) where a prompt investigation was not conducted;

d. each incident of deviation described in "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 "a" where proper records were not maintained for the investigation and/or the corrective action.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements specified in Part A., Standard Terms and Conditions, of this permit.

[Authority for term: PTI P0120066 issued on 12/23/2015 and OAC rules 3745-15-03(C), and OAC rule 3745-77-07(A)(3)(c)]

(3) The permittee shall submit semiannual written reports that, at a minimum:

a. identify all days during which any visible particulate emissions were observed from any stacks serving this emissions unit; and

b. describe any corrective actions taken to minimize or eliminate the visible particulate emissions.

The semiannual reports shall be submitted in accordance with the reporting requirements specified in Part A., Standard Terms and Conditions, of this permit.

[Authority for term: PTI P0120066 issued on 12/23/2015 and OAC rules 3745-15-03(A) and 3745-77-07(A)(3)(c)]

(4) The permittee shall comply with the applicable reporting requirements listed in 40 CFR Part 63, Subpart XXXXXX in §63.11519(a) and (b).

f) Testing Requirements

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

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

17.7 lbs PE per hour

<u>Applicable Compliance Method:</u>

The uncontrolled mass rate of emissions (UMRE) shall be used to determine the allowable emission limitation from Figure II of OAC rule 3745-17-11. The UMRE was calculated using an emission factor of 16.0 pound filterable particulate per ton of metal produced for shot blasting (captured and uncontrolled) found in

"Emission Estimation Protocol for Iron and Steel Foundries" by RTI International dated December, 2012 in Table 6-2.

Multiplying this factor by the maximum process weight rate of 12.5 tons steel processed gives a total UMRE of 200 pounds per hour of particulates. Using Figure II, the allowable emission rate (A) in pounds per hour is determined from curve P1 and the following equation:

$$A = 0.5782 \times (U)^{0.6456} = 0.5782 \times (200)^{0.6456} = 17.7 \text{ lb PE /hr}$$

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC Rule 3745-17-03(B)(10). Otherwise, compliance shall be demonstrated by the absence of any visible particulate emissions from the baghouse serving this emissions unit performed in accordance with 40 CFR Part 60, Appendix A, Method 22.

b. Emission Limitation:

The minimum control efficiency of the fabric filter dust collection device (baghouse) shall be 99.0%. This emission unit shall operate with 100% capture efficiency.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through emission testing performed in accordance with 40 CFR Part 60, Subpart A or an alternative method approved by the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) for monitoring the inlet and outlet of the baghouse servicing this emission unit.

c. Emission Limitation:

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

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance through visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

[Authority for term: PTIP0120066 issued on 12/23/2015 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

5. P051, Blast Room (OB17)

Operations, Property and/or Equipment Description:

8.25 tph shot blaster enclosed in a blast room having 100% capture efficiency and exhausting to an 8500 acfm cartridge filter type baghouse.

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

(1) b)(1)b. and b)(1)c.

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 (PTI P0120066 issued 12/23/2015)	The Best Available Technology (BAT) requirements have been determined to be equivalent to 40 CFR Part 63, Subpart XXXXXX (40 CFR 63.11514 – 63.11523) See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008 (PTI P0120066 issued 12/23/2015) [Less than 10 tpy BAT exemption]	The Best Available Technology (BAT) requirements under OAC rule 3745-31-03(A)(3) do not apply to 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) See b)(2)b.
c.	OAC rule 3745-31-05(E) June 30, 2008 (Voluntary Restrictions to avoid BAT from PTI P0120066 issued 12/23/2015)	Install a shot blast enclosure with 100% capture efficiency exhausting to a baghouse with an outlet grain loading not to exceed 0.01 grains/dscf of particulate. Particulate emissions which are less than 10 microns in diameter (PM_{10}) from the baghouse stack shall not exceed 0.73 lbs/hr and 3.20 tons/yr. Visible particulate emissions (VE) from the stack serving this emissions unit shall not exceed 5% opacity as a six-minute average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		There shall be no visible emissions of fugitive dust emitted from this emissions unit and/or the area immediately above the capture system serving this emissions unit. See c)(1).
d.	40 CFR Part 63, Subpart A (40 CFR 63.1-16)	Table 1 to Subpart XXXXXX of 40 CFR Part 63 – Applicability of General Provisions
e.	40 CFR Part 63, Subpart XXXXXX (40 CFR 63.11514 – 63.11523) [In accordance with 40 CFR 63.11514, this emissions unit is an existing affected source engaged in the production of iron and steel forgings that conducts dry abrasive blasting.]	This emission unit shall comply with all the applicable requirements of 40 CFR Part 63, Subpart XXXXXX See b)(2)c. and c)(1).
f.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. These emission limitations specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(E).
g.	OAC rule 3745-17-07(B)	Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average. This emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(E).
h.	OAC rule 3745-17-08(B)	The permittee shall minimize or eliminate visible fugitive particulate through the employment of reasonably available control measures (RACM). This limitation specified by this rule is less stringent than the limitations established pursuant to OAC rule 3745-31-05(E) and 40 CFR Part 63, Subpart XXXXXX

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
i.	OAC rule 3745-17-11(B)	13.5 lbs PE/hr This emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(E).

(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 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 Ohio SIP.

c. The permittee shall comply with the applicable requirements under 40 CFR Part 63, Subpart XXXXXX, including the following sections:

63.11516(a)(2)(i)-(ii)	You must capture emissions and vent them to a filtration control device. You must operate the filtration control device according to manufacturer's instructions, and you must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices You must implement the management practices to minimize emissions of MFHAP as specified in paragraphs (a)(2)(ii)(A) through (C) of this section.
63.11516(a)(2)(ii)(A)	Implement measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions
63.11516(a)(2)(ii)(B)	Enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials
63.11516(a)(2)(ii)(C)	Operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions

c) Operational Restrictions

(1) The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation.

[Authority for term: PTI P0120066 issued on 12/23/2015, 40 CFR 63.11516(a)(2),and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall record any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse.

[Authority for term: PTI P0120066issued on 12/23/2015, 40 CFR 63.11516(a)(2),and OAC rule 3745-77-07(C)(1)]

(2) The acceptable range for the pressure drop across the baghouse is 1.0 to 6.0 inches of water, which is based upon the manufacturer's specification.

[Authority for term: PTI P0120066 issued on 12/23/2015 and OAC rule 3745-77-07(C)(1)]

(3) 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 is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a 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 subject to approval by the Canton City Health Department, Air Pollution Control Division (CCHD, APCD). The acceptable pressure drop is contained in d)(2) above.

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.

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 CCHD, APCD. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrates 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: PTI P0120066issued on 12/23/2015 and OAC rule 3745-77-07(C)(1)]

(4) The permittee shall perform weekly checks, when the emissions unit is in operation and, when the weather conditions allow, for any visible particulate emissions from the exhaust stack and for any visible emissions of fugitive dust from this emissions unit and/or the area immediately above the capture system serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from any points of capture and/or the stack, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

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

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

[Authority for term: PTI P0120066 issued on 12/23/2015 and OAC rule 3745-77-07(C)(1)]

(5) The permittee shall comply with the applicable requirements under 40 CFR Part 63, Subpart XXXXXX, including the following sections:

63.11519(c)(1)	Each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report. Records of the applicability determinations as in §63.11514(b)(1) through (5).
63.11519(c)(4)	Maintain a record of the manufacturer's specifications for the control devices used to comply with §63.11516(a)(2)
63.11519(c)(13)	Maintain a record of the manufacturer's instructions for the equipment operated used to comply with §63.11516(a)(2)(ii)(B)

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.

[Authority for term: OAC rule 3745-15-03(A)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following, at a minimum:

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 d)(1);

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

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

d. each incident of deviation described in “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 “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.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of Part A., Standard Terms and Conditions, of this permit.

[Authority for term: PTI P0120066 issued on 12/23/2015 and OAC rules 3745-15-03(C) and 3745-77-07(A)(3)(c)]

(3) The permittee shall submit semiannual reports that identify, at a minimum:

a. all days during which any visible emissions of fugitive dust were observed from this emissions unit and/or the area immediately above the capture system serving this emissions unit;

b. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and

c. any corrective actions taken eliminate the visible emissions.

The semiannual reports shall be submitted in accordance with the reporting requirements of Part A., Standard Terms and Conditions, of this permit.

[Authority for term: PTI P0120066issued on 12/23/2015 and OAC rules 3745-15-03(A) and 3745-77-07(A)(3)(c)]

(4) The permittee shall comply with the applicable reporting requirements listed in 40 CFR Part 63, Subpart XXXXXX in §63.11519(a) and (b).

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>

A shot blast enclosure with 100% capture efficiency exhausting to a baghouse with an outlet grain loading not to exceed 0.01 grains/dscf.

<u>Applicable Compliance Method</u>

The baghouse's maximum outlet grain loading of 0.01 gr/dscf is based on manufacturer's specifications.

[Authority for term: PTI P0120066 issued on 12/23/2015 and OAC rule 3745-77-07(C)(1)]

b. <u>Emission Limitation</u>

PM_{10} emissions from the baghouse stack shall not exceed 0.73 lbs/hr and 3.20 tons/yr.

<u>Applicable Compliance Method</u>

The hourly emissions limitation was established by multiplying the baghouse manufacturers specified maximum outlet grain loading of 0.01 gr/dscf by the baghouse design flow rate as shown below:

0.01 gr/dscf x 8500 dscf/min x 60 min/hr ÷ 7000 gr/lb = 0.73 lbs PM_{10}/hr

The ton per year emission limitation was established by multiplying the hourly PM_{10} emission limitation by the maximum annual hours of operation, and then converting to tons, as shown below:

0.73 lbs PM_{10}/hr x 8760 hrs/yr ÷ 2000 lbs/ton = 3.20 tons PM_{10}/yr

Therefore, if compliance is shown with the hourly emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the hourly emissions limitation shall be demonstrated through emissions testing performed in accordance with U.S. EPA Method 5 of 40 CFR Part 60, Appendix A.

[Authority for term: PTI P0120066issued on 12/23/2015 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation

Visible particulate emissions (VE) from the stack serving this emissions unit shall not exceed 5% opacity as a six-minute average.

Applicable Compliance Method

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

[Authority for term: PTI P0120066issued on 12/23/2015 and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation

There shall be no visible emissions of fugitive dust emitted from this emissions unit and/or the area immediately above the capture system serving this emissions unit.

Applicable Compliance Method

If required, compliance with the visible emissions limitation of fugitive dust shall be determined in accordance with U.S. EPA Method 22 of 40 CFR Part 60, Appendix A.

[Authority for term: PTI P0120066issued on 12/23/2015 and OAC rule 3745-77-07(C)(1)]

e. Emission Limitation

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

Applicable Compliance Method

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

[Authority for term: PTI P0120066issued on 12/23/2015, OAC rules 3745-17-07 and 3745-77-07(C)(1)]

f. Emission Limitation

Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method

If required, compliance shall be demonstrated based upon visible particulate emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

[Authority for term: PTI P0120066issued on 12/23/2015 and OAC rule 3745-77-07(C)(1)]

g. Emission Limitation

13.5 lbs PE/hr

Applicable Compliance Method

The permittee shall comply with the more restrictive requirement of either Table 1 or Figure II of OAC rule 3745-17-11. Therefore, the allowable particulate emission limitation was determined from Figure II, based on the UMRE of 11.4 which is more stringent than value from Table 1.

UMRE = EF X PWR = 16.0 x 8.25 = 132.0 lbs/hr

Where,

EF = emission factor = 16.0 pound filterable particulate per ton of metal produced for shot blasting or sand blasting (captured and uncontrolled) found in “Emission Estimation Protocol for Iron and Steel Foundries” by RTI International dated December, 2012 in Table 6-2.

PWR = process weight rate in tons/hr is equal to 8.25

Using Fig. II, with uncontrolled emissions of 132.0 lb/hr, and reading Curve P-1.

$A = 0.5782 \times (U^{0.6456})$, where "U" is the UMRE

$A = 0.5782 \times (132.0^{0.6456})$ = 13.5 lbs/hr

The maximum allowable particulate emission rate (A) = 13.5 lb/hr.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC Rule 3745-17-03(B)(10).

[Authority for term: PTI P0120066issued on 12/23/2015, OAC rules 3745-17-11 and 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

6. Emissions Units Group –Grinding Group: P033,P034,P035

EU ID	Operations, Property and/or Equipment Description
P033	Grinding Area No. 1. - Hand grindings of forgings with a maximum process weight rate of 2.38 tons per hour controlled by a baghouse (GRND)
P034	Grinding Area No. 2. - Hand grindings of forgings with a maximum process weight rate of 2.38 tons per hour controlled by a baghouse (GRND)
P035	Grinding Area No. 3. - Hand grindings of forgings with a maximum process weight rate of 2.38 tons per hour controlled by a baghouse (GRND)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 63, Subpart XXXXXX (40 CFR 63.11514 – 63.11523) [In accordance with 40 CFR 63.11514, this emissions unit is an existing affected source engaged in the production of iron and steel forgings that conducts dry grinding and dry polishing with machines.]	This emission unit shall comply with all the applicable requirements of 40 CFR Part 63, Subpart XXXXXX See b)(2)b.
b.	40 CFR Part 63, Subpart A (40 CFR 63.1-16)	Table 1 to Subpart XXXXXX of 40 CFR Part 63 – Applicability of General Provisions
c.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. This stack visible particulate emissions limitation established by this rule is less stringent than the stack visible particulate emissions limitation established by OAC rule 3745-17-08(B).

d.	OAC rule 3745-17-07(B)	Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
e.	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. below.
f.	OAC rule 3745-17-11(B)	12.4 pounds per hour of particulate emissions (combined limit for 3 grinding operations) See b)(2)a. This emissions limitation established by this rule is less stringent than the emissions limitation established by OAC rule 3745-17-08(B).

(2) Additional Terms and Conditions

a. The permittee shall use a three-sided booth enclosure with the particulate emissions directed towards the ventilation duct to minimize or eliminate visible fugitive particulate emissions from this emissions unit.

The collection efficiency of the booth ventilation system, which is connected to fabric filter control equipment, shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

The fabric filter control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions (whichever is less stringent) from the exhaust stack of this emissions unit.

b. The permittee shall comply with the applicable requirements under 40 CFR Part 63, Subpart XXXXXX, including the following sections:

63.11516(c)(1)-(2)	You must capture emissions and vent them to a filtration control device. You must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices. You must implement management practices to minimize emissions of MFHAP as specified in paragraphs (c)(2)(i) and (ii) of this section.

63.11516(c)(2)(i)	Implement measures necessary to minimize excess dust in the surrounding area
63.11516(c)(2)(ii)	Operate all equipment associated with the operation of dry grinding and dry polishing with machines, including the filtration control device, according to manufacturer's instructions

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible fugitive particulate emissions from any non-stack egress point (e.g. 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 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 emission incident; and

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the check until the incident has ended. The observer may indicate that the visible emission 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 3745-77-07(C)(1) to ensure compliance with 3745-17-07]

(2) The permittee shall comply with the applicable requirements under 40 CFR Part 63, Subpart XXXXXX, including the following sections:

63.11519(c)(1)	Each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report. Records of the applicability determinations as in §63.11514(b)(1) through (5).
63.11519(c)(4)	Maintain a record of the manufacturer's specifications for the control devices used to comply with §63.11516(c)(1)
63.11519(c)(13)	Maintain a record of the manufacturer's instructions for the equipment operated used to comply with §63.11516(c)(2)(ii)

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.

[Authority for term: OAC rule 3745-15-03(A)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following, at a minimum:

a. 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;

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements specified in Part A., Standard Terms and Conditions, of this permit.

[Authority for term: OAC rules 3745-15-03(C) and 3745-77-07(A)(3)(c)]

(3) The permittee shall submit semiannual written reports that, at a minimum:

a. identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and/or any non-stack egress point serving this emissions unit; and

b. describe any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible fugitive particulate emissions.

The semiannual reports shall be submitted in accordance with the reporting requirements specified in Part A., Standard Terms and Conditions, of this permit.

[Authority for term: OAC rule 3745-15-03(A) and 3745-77-07(A)(3)(c)]

(4) The permittee shall comply with the applicable reporting requirements listed in 40 CFR Part 63, Subpart XXXXXX in §63.11519(A) and (B).

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

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

b. Emission Limitation:

20% opacity as a 3-minute average, for fugitive emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

c. Emission Limitation:

The fabric filter control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions (whichever is less stringent) from the exhaust stack of this emissions unit.

Applicable Compliance Method:

If required, compliance with the requirement for no visible particulate emissions from the exhaust stack shall be determined in accordance with U.S. EPA Method 22. If opting to comply with the outlet particulate emissions rate, if required, compliance with the 0.030 grain of particulate emissions per dry standard cubic

foot of exhaust gases from the stack shall be determined in accordance with U.S. EPA Methods 1 through 5, as appropriate.

d. Emission Limitation:

12.4 pounds per hour of particulate emissions

Applicable Compliance Method:

The permittee shall comply with the more restrictive requirement of either Table 1 or Figure II of OAC rule 3745-17-11. Therefore, the allowable particulate emission limitation was determined from Figure II, based on the UMRE of 115.4 which is more stringent than value from Table 1.

UMRE = EF X PWR = 16.16 x 7.14 = 115.4 lbs/hr

Where,

EF = emission factor = 16.16 pound filterable particulate per ton of metal produced for grinding (captured and uncontrolled plus uncaptured and uncontrolled) found in "Emission Estimation Protocol for Iron and Steel Foundries" by RTI International dated December, 2012 in Table 6-2.

PWR = process weight rate in tons/hr which is the combined rates of 3 grinding units (since similar units) = 3 x 2.38 = 7.14

Since UMRE is greater than 10, Figure 2 is used. The allowable emission rate (E) in pounds per hour is determined with the following equation:

$A = 0.5782\ (U)^{0.6456}$ = 0.5782 $(115.4)^{0.6456}$ = 12.4 lb/hr

A = Maximum Allowable Emissions

U = UMRE

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC Rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

7. Emissions Units Group -Heat Treat Furnaces: P024,P026

EU ID	Operations, Property and/or Equipment Description
P024	Natural gas-fired Hagan pusher type annealing furnace, Model Y6816, maximum heat input 11.29 MMBtu/hr (fugitive emissions only)
P026	Natural gas-fired Hagan pusher type annealing furnace, Model Y6819, maximum heat input 11.75 MMBtu/hr (fugitive emissions only)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)	Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
b.	OAC rule 3745-17-08(B)	See b)(2)a. below.
c.	OAC rule 3745-17-10	Not applicable. See b)(2)b. below.
d.	OAC rule 3745-18-06(E)(1)	Sulfur dioxide (SO_2) emissions shall not exceed 31.3 pounds per hour.

(2) Additional Terms and Conditions

a. The process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process. Therefore, the only source of particulate emissions is from fuel burning. Natural gas burning is known to be inherently clean in regards to particulate emissions. Therefore, by using only natural gas as fuel, as required in term c)(1), the reasonably available control measure requirements specified in OAC rule 3745-17-08(B) are satisfied.

b. These rules apply to sources in which fuel is burned for the primary purpose of producing heat or power by indirect heat transfer per OAC rule 3745-17-10(A). This emission unit does not meet that definition since it burns fuel for the purpose of producing heat by direct heat transfer to the process materials (steel billets) employed in this emission unit.

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1) to ensure compliance with 3745-18-82 and 17-07]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) to ensure compliance with 3745-18-82 and 17-08]

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.

[Authority for term: OAC rule 3745-15-03(A)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following, at a minimum:

a. each day when a fuel other than natural gas was burned in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements specified in Part A., Standard Terms and Conditions, of this permit.

[Authority for term: OAC rule 3745-15-03(C) and 3745-77-07(A)(3)(c)]

f) Testing Requirements

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

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

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

<u>Applicable Compliance Method:</u>

If required, compliance shall be demonstrated based upon visible particulate emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the

building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

b. Emission Limitation:

SO_2 emissions shall not exceed 31.3 pounds per hour.

Applicable Compliance Method:

3745-18-06(E)(1) specifies General emission limit provisions equivalent to the following equation:

$AER = 20 X (P)^{0.67} = 20 x (1.95)^{0.67} = 31.3$ lb/hr

Where,

AER = allowable emission rate

P = process weight rate (Tons per hour) of steel billets processed per emission unit

The SO_2 emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials (steel billets) employed in this emissions unit do not generate SO_2 emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel as shown by the following:

SO_2 (lb/MMBtu) = EF X conversion factor X heat input capacity

For P024 = (0.6 lb/10^6 scf) X (10^6scf/1020 MMBtu) X 11.29 MMBtu = 0.0066 lb/hr

For P026 = (0.6 lb/10^6 scf) X (10^6scf/1020 MMBtu) X 11.75 MMBtu = 0.0069 lb/hr

Emission factor (EF) from AP-42 table 1.4-2 (Natural Gas combustion)

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 and the procedures identified in OAC rule 3745-18-04.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

8. Emissions Units Group Natural Gas / #2 Oil Boilers: B002, B003

EU ID	Operations, Property and/or Equipment Description
B002	Boiler No. 2: B&W Sterling Class 131 No. 24 natural gas and no. 6 or better fuel oil fired boiler, maximum heat input of 88 MMBtu per hour.
B003	Boiler No. 3: B&W Sterling Class 131 No. 24 natural gas and no. 6 or better fuel oil fired boiler, maximum heat input of 88 MMBtu per hour.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 63, Subpart JJJJJJ (40 CFR 63.11193 – 63.11237) [In accordance with 40 CFR 63.11194, 63.11200 and 63.11237, this emissions unit is an existing affected source natural gas / oil fired industrial boiler subject to the oil subcategory requirements as defined in this subpart, located at an existing area source of hazardous air pollutants (HAPs)]	This emission unit shall comply with all the applicable requirements of 40 CFR Part 63, Subpart JJJJJJ. No applicable emission limits are included in 40 CFR Part 63, Subpart JJJJJJ.
b.	40 CFR Part 63, Subpart A (40 CFR 63.1-16) (40 CFR 63.11235)	Table 8 to 40 CFR Part 63, Subpart JJJJJJ – Applicability of General Provisions (Subpart A) to Subpart JJJJJJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-17-10(C)(1)	0.150 pound of particulate emissions (PE) per MMBtu actual heat input.
e.	OAC rule 3745-18-82(B)(3)	2.50 pounds of sulfur dioxide (SO_2) per

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		MMBtu actual heat input from each emission unit. See c)(1)-(2) below.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall burn only natural gas and fuel oil (No. 6 or better) in this emission unit.

[Authority for term: OAC rule 3745-77-07(A)(1) to ensure compliance with 3745-18-82]

(2) The quality of the fuel oil burned in this emission unit shall have a combination of heat and sulfur content which is sufficient to comply with the allowable SO_2 emission limitation.

[Authority for term: OAC rule 3745-77-07(A)(1) to ensure compliance with 3745-18-82]

(3) The permittee shall comply with the applicable requirements required under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11205	General Compliance
63.11223	Continuous compliance with the work practice and management practice standards
63 subpart JJJJJJ Table 2	Work Practice Standards, Emission Reduction Measures and Management practices. Including Minimization of startup and shutdown periods, conduct initial tune up and 5 yr tune up, and one time energy assessment
63.11237	Definitions (including Energy Assessment)

d) Monitoring and/or Recordkeeping Requirements

(1) On a once per week basis, the permittee shall maintain records of the total quantity of fuel oil burned in this emissions unit, the permittee's or fuel oil supplier's analyses for sulfur content, heat content, and density of the fuel oil, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content, and density of the oil in accordance with 40 CFR Part 60

Appendix A, Method 19, or the appropriate ASTM methods. Alternative equivalent methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

[Authority for term: OAC rule 3745-77-07(C)(1) to ensure compliance with 3745-18-82]

(2) For each day during which the permittee burns a fuel other than natural gas or fuel oil (no. 6 or better), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) to ensure compliance with 3745-18-82, 17-07 and 17-10]

(3) For each day when fuel oil (no. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any stack serving this emissions unit. The presence or absence of any visible emissions observed during any of the weekly checks required above shall be noted in an operations log. If visible emissions are observed, the permittee shall also document 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 emission incident; and

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission 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 3745-77-07(C)(1) to ensure compliance with 3745-17-07]

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.

[Authority for term: OAC rule 3745-15-03(A)]

(2) The permittee shall comply with the applicable requirements under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11225	Notification, reporting and recordkeeping requirements

(3) The permittee shall submit quarterly deviation (excursion) reports that identify the following, at a minimum:

a. any record which shows a deviation of the allowable SO_2 emission limitation based upon the calculated sulfur dioxide emission rates from term d) above. The notification shall include a copy of such;

b. each day when a fuel other than natural gas and/or fuel oil (no. 6 or better) was burned in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements specified in Part A., Standard Terms and Conditions, of this permit.

[Authority for term: OAC rule 3745-15-03(C) and 3745-77-07(A)(3)(c)]

(4) The permittee shall submit semiannual written reports that, at a minimum:

a. identify all days when this emissions unit was burning fuel oil (no. 4, 5, and/or 6) and any visible particulate emissions were observed from any stacks serving this emissions unit and;

b. describe any corrective actions taken to minimize or eliminate the visible particulate emissions.

The semiannual reports shall be submitted in accordance with the reporting requirements specified in Part A., Standard Terms and Conditions, of this permit.

[Authority for term: OAC rule 3745-15-03(A) and 3745-77-07(A)(3)(c)]

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

b. Emission Limitation:

0.150 pound of particulate emissions per MMBtu actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing requirements specified in term f)(3).

c. Emission Limitation:

2.5 pounds of SO_2 per MMBtu actual heat input

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated based upon the records required pursuant to term d) and the emission testing required pursuant to term f)(3).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall comply with the applicable requirements under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63 subpart JJJJJJ table 4	Performance (Stack) Testing Requirements

(3) 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 45 days after fuel oil is burned in this emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable visible particulate emission limitations, the particulate mass emission limitation, and the SO_2 mass emission limitation.

c. The following test methods shall be employed to demonstrate compliance with the allowable emission limitations:

i. for the visible particulate emission limitations, Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1);

ii. for the particulate mass emission limitation, Methods 1 through 5 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(9); and

iii. for the SO_2 mass emission limitation, Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A.

d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.

e. The tests shall be performed with the emissions unit burning the worst-case fuel oil at the time of the test.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CCHD, APCD. 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 CCHD, APCD's refusal to accept the results of the emission test(s).

g. Personnel from the CCHD, APCD 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the CCHD, APCD 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 CCHD, APCD.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) The permittee may burn fuel oil in this emissions unit for no more than 2 days during any calendar year for the purpose of establishing operational readiness of the emissions unit without triggering the emission test required in term f)(3). During this 2-day period, the permittee shall maintain compliance with all of the emission limitations specified in term b)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

9. Emissions Unit Group -Rotary Furnace Group: P001, P002, P003, P004, P005, P006, P007, P009, P010

EU ID	Operations, Property and/or Equipment Description
P001	17-foot, natural gas fired Hagan rotary furnace, 21.56 MMBtu/hr (fugitive emissions only)
P002	17-foot, natural gas fired Hagan rotary furnace, 21.56 MMBtu/hr (fugitive emissions only)
P003	17-foot, natural gas fired Hagan rotary furnace, 21.88 MMBtu/hr (fugitive emissions only)
P004	17-foot, natural gas fired Hagan rotary furnace, 21.88 MMBtu/hr (fugitive emissions only)
P005	17-foot, natural gas fired Hagan rotary furnace, 21.56 MMBtu/hr (fugitive emissions only)
P006	17-foot, natural gas fired Hagan rotary furnace, 21.56 MMBtu/hr (fugitive emissions only)
P007	14-foot, natural gas fired Hagan rotary furnace, 15.84 MMBtu/hr (fugitive emissions only)
P009	17-foot, natural gas fired Hagan rotary furnace, 21.56 MMBtu/hr (fugitive emissions only)
P010	14-foot, natural gas fired Hagan rotary furnace, 14.00 MMBtu/hr (fugitive emissions only)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)	Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.
b.	OAC rule 3745-17-08(B)	See b)(2)a. below.
c.	OAC rule 3745-17-10	Not applicable. See b)(2)b. below.
d.	OAC rule 3745-18-82(B)(4)-(5)	See b)(2)c. below.

(2) Additional Terms and Conditions

a. The process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process. Therefore, the only source of particulate emissions is from fuel burning. Natural gas burning is known to be inherently clean in regards to particulate emissions. Therefore, by using only natural gas as fuel, as required in term c)(1), the reasonably available control measure requirements specified in OAC rule 3745-17-08(B) are satisfied.

b. These rules apply to sources in which fuel is burned for the primary purpose of producing heat or power by indirect heat transfer per OAC rule 3745-17-10(A). This emission unit does not meet that definition since it burns fuel for the purpose of producing heat by direct heat transfer to the process materials (steel billets) employed in this emission unit.

c. These rules apply to fuel oil consumption and content. This emission unit has removed its capability to use any fuel oil. Therefore, compliance with these rules is assumed.

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1) to ensure compliance with 3745-18-82 and 17-07]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) to ensure compliance with 3745-18-82 and 17-08]

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.

[Authority for term: OAC rule 3745-15-03(A)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following, at a minimum:

a. each day when a fuel other than natural gas was burned in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements specified in Part A., Standard Terms and Conditions, of this permit.

[Authority for term: OAC rule 3745-15-03(C) and 3745-77-07(A)(3)(c)]

f) Testing Requirements

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

a. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

For purposes of verifying compliance with this emission limitation, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

[Authority for term: OAC rule 3745 77 07(C)(1)]

g) Miscellaneous Requirements

(1) None.