Ohio Environmental Protection Agency

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

6/13/2016

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Charter Steel
Facility ID: 0387000376
Permit Type: Minor Permit Modification
Permit Number: P0120409

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. 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. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-2835 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

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

Cc: Ohio EPA DAPC, Northwest District Office

PROPOSED

Division of Air Pollution Control
Title V Permit
for
Charter Steel

Facility ID:	0387000376
Permit Number:	P0120409
Permit Type:	Minor Permit Modification
Issued:	6/13/2016
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
Charter Steel

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Authorization

Facility ID:	0387000376
Facility Description:	Metal Heat Treating and Cold Finishing of Steel Shapes.
Application Number(s):	A0055309
Permit Number:	P0120409
Permit Description:	Title Vminor permit modification to incorporate the terms of recently issued PTIs and incorporate MACT terms for insignificant emissions units.
Permit Type:	Minor Permit Modification
Issue Date:	6/13/2016
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0114976

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

Charter Steel
6255 U.S. Highway 23 South
Risingsun, OH 43457

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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 Ohio EPA DAPC, Northwest District Office. 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 Ohio EPA DAPC, Northwest District Office. 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 Ohio EPA DAPC, Northwest District Office 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 Ohio EPA DAPC, Northwest District Office 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

Officialthat, 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 Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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

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

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 Ohio EPA DAPC, Northwest District Office) 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 Ohio EPA DAPC, Northwest District Office 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 Ohio EPA DAPC, Northwest District Office 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 Requirements Under 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 theOhio EPA DAPC, Northwest District Office.

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 Ohio EPA DAPC, Northwest District Office. 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 Requirements Under 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 Ohio EPA DAPC, Northwest District Office 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 Ohio EPA DAPC, Northwest District Office 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 Ohio EPA DAPC, Northwest District Office, 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. Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions unit P901 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions unit.

   [Authority for term: 40 CFR Part 64]

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 requirements 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:

EU ID	Operations, Property and/or Equipment Description
B001	Pickling Line #1 boiler (PBR09863)
B002	Pickling Line #2 boiler (PBR09863)
P005	annealing furnace #5 (03-16330)
P006	annealing furnace #6 (03-16330)
P007	annealing furnace #7 (03-16330)
P008	annealing furnace #8 (03-16330)
P009	annealing furnace #1 (03-17227)
P010	annealing furnace #2 (03-17227)
P011	annealing furnace #3 (03-17227)
P012	annealing furnace #4 (03-17227)
P026	280 hp NG fired emergency generator #1 (PBR12112).
P027	280 hp NG fired emergency generator #2 (PBR12112).
P028	annealing furnace #9 (P0117994)
P029	annealing furnace #10 (P0117994)
P030	annealing furnace #11 (P0117994)
P031	annealing furnace #12 (P0117994)
P032	280 hp NG fired emergency generator #3 (PBR14838)

[Authority for term: OAC rule 3745-77-07(A)(13)]

4. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines (RICE), as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart ZZZZ. The final rules establish national emission standards for hazardous air pollutants (NESHAP), operational limits, work practice standards, and compliance requirements for industrial, commercial, and institutional boilers and process heaters located at a major source of hazardous air pollutants (HAP). The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart ZZZZ. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 8 of 40 CFR Part 63, Subpart ZZZZ. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart ZZZZ, and Subpart A. The complete MACT requirements, including the MACT 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.

a) Emission unit **P026** meets the definition of an existing (installed before 6/12/06) emergency spark ignition (SI) RICE, less than or equal to 500 brake horse power and located at a major source for HAPs, shall meet the requirements of Part 63, Subpart ZZZZ no later than 5/3/13 and the permittee shall meet the following requirements contained in 40 CFR, Part 63, Subpart ZZZZ:

63.6602	Compliance requirements in Table 2c #6; continuous compliance in Table 6 #9; general provision from Subpart A in Table 8.
63.6665	Meet all of the general provisions of Subpart A, from Sections 63.1 through 63.15, that apply to the SI RICE, as identified in Table 8 to Subpart ZZZZ.
63.6675 and 63.6640(f)	The RICE shall meet the definition of an emergency stationary RICE in order to be considered an emergency engine and subject to the requirements for an emergency RICE.
Operational restrictions	
63.6605	General duty to minimize emissions, with good air pollution control practices for minimizing emissions; and compliance required at all times.
63.6625(e)	Operate & maintain RICE according to mfg. instructions or develop a facility maintenance plan for the RICE that meets the requirements of Subpart ZZZZ Table 2c #6.
63.6625(f)	Install a non-resettable hour meter by compliance date.
63.6625(h)	Minimize idle and startup time, not to exceed 30 minutes.
63.6625(j)	Oil analysis program option to extend the oil change frequency.
Monitoring and/or recordkeeping requirements	
63.6635	Except for monitor malfunctions, associated repairs, and required quality assurance activities, must continuously monitor that the RICE is operating. Must use all valid data (not recorded during malfunctions, repairs, or required quality assurance or control activities) in calculations used to report emissions or operating levels.
63.6655(f)	Maintain records of the hours of operation in emergency operations, non-emergency operations, and in maintenance checks and readiness testing, as recorded through the non-resettable hour meter. If the RICE is used for demand response, records of the notification of the emergency and the time of operation, as part of the demand response, is to be maintained.
63.6655(a)	Keep records of: 1. each notification and report submitted to comply with

	Subpart ZZZZ; 2. the occurrence and duration of each malfunction of the RICE; and 3. corrective actions taken during each period of malfunction to minimize emissions and restore normal operations.
63.6640(a) and 63.6655(d)	Keep the records required in #9 of Table 6 to Subpart ZZZZ to demonstrate continuous compliance.
63.6655(e)	Records of maintenance and inspections conducted in order to demonstrate compliance with Table 2c and to demonstrate that the RICE was operated and maintained according to the facility's maintenance plan.
63.6625(h)	Maintain a record of each idle and/or startup time that exceeded 30 minutes.
63.6660	Records readily available and retained for at least 5 years after the date of occurrence or date of report according to 63.10(b)(1).
Reporting Requirements	
63.6640(b)	Report each instance in which the operational requirements in Table 2c of the NESHAP Subpart ZZZZ were not met.
63.6640(e)	Report each instance in which the applicable requirements in Table 8 to Subpart ZZZZ, the general provisions from Subpart A, were not met.

b) Emission unit **P027 and P032** meet the definition of a new (installed on or after 6/12/06) emergency spark ignition (SI) RICE, less than or equal to 500 brake horse power, and located at a major source for HAPs, shall meet the requirements of Part 63, Subpart ZZZZ upon startup, through demonstration of compliance with the New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines, Part 60, Subpart JJJJ.

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR Part 63, Subpart ZZZZ]

2. Emissions units **P027 and P032** are subject to 40 CFR, Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. The complete NSPS requirements, including the NSPS 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 Ohio EPA, Northwest District Office. The permittee shall comply with all applicable requirements of 40 CFR, Part 60, Subpart JJJJ. The permittee shall also comply with all applicable requirements of 40 CFR, Part 60, Subpart A (General Provisions).

The permittee shall meet the following requirements contained in 40 CFR, Part 60, Subpart JJJJ:

60.4230	Applicability
60.4233(e)	Compliance requirement in Table 1.
60.4237(b)	Install non-resettable hour meter, if applicable
60.4243(b)	Certification requirements
60.4243(d)	The ICE shall meet the definition of an emergency stationary RICE in order to be considered an emergency engine and subject to the requirements for an emergency ICE.
60.4243(f)	Perform initial performance testing if a non-certified engine was purchased or if the ICE and/or control device is not operated and maintained according to the manufacturer's written emission-related instructions.
60.4245(a)	Keep records of: 1. each notification and report submitted to comply with Subpart JJJJ; 2. Maintenance conducted on the engine; and 3. If certified, documentation from the manufacturer and 4. If not certified or not operating

	in a certified manner and therefore subject to 60.4243(a)(2), documentation that the engine meets the emission standards.
60.4245(e)	Annual report, if applicable, if unit operates for the purposes specified in 60.4243(d)(2)(ii) and (iii) or 60.4243(d)(3)(i).
60.4246	General provisions, Table 3

[Authority for term:OAC rule 3745-77-07(A)(13) and 40 CFR Part 60, Subpart JJJJ]

3. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart DDDDD. The final rules found in 40 CFR Part 63, Subpart DDDDD establish national emission standards for hazardous air pollutants (NESHAP), operational limits, work practice standards, and compliance requirements for industrial, commercial, and institutional boilers and process heaters located at a major source of hazardous air pollutants (HAP). The permittee shall comply with the requirements and limits of this NESHAP for the facility's new (commenced construction after 6/4/10) boilers by January 31, 2013, or upon startup, whichever is later; and the facility's existing boilers shall be in compliance with 40 CFR Part 63, Subpart DDDDD no later than January 31, 2016. The complete MACT requirements, including the MACT 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.

a) Emissions units **B001 and B002** meet the definition of new or reconstructed boilers or process heaters with a heat input capacity of 10 mmBtu per hour or greater; therefore, the following requirements found in 40 CFR, Part 63, Subpart DDDDD are applicable:

Work Practice Standards	63.7500(a)(3), (f), and Table 3
General Requirements	63.7505(a), 63.7565 and Table 10
Initial Compliance Requirements	63.7530(e)
Tune-up Requirements	63.7515(d) and Table 3
Continuous Compliance Requirements	63.7540(a)(10) and (a)(13)
Reporting Requirements	63.7545(a), (f), (h), 63.7550(a), (b), (c)(1) and Table 9
Record Keeping Requirements	63.7555(a), (i) and (j) and 63.7560

b) The following boilers or process heaters are designed to only burn gas 1 fuels (subcategory) with a heat input of less than 10 mmBtu/hr and therefore are not subject to the emission limits in Table 2 of the subpart or the operating limits in Table 4 to the subpart. However, the boiler(s) is/are subject to tune-ups requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart; and the existing boilers must be included in the one-time energy assessment, performed in accordance with Table 3 #4 of the subpart:

EU ID	Operations, Property and/or Equipment Description
B003	backup natural gas fired boiler #1
B004	backup natural gas fired boiler #2
P005	annealing furnace #5
P006	annealing furnace #6
P007	annealing furnace #7
P008	annealing furnace #8
P009	annealing furnace #1
P010	annealing furnace #2
P011	annealing furnace #3
P012	annealing furnace #4
P028	annealing furnace #9
P029	annealing furnace #10
P030	annealing furnace #11
P031	annealing furnace #12

[Authority for term:OAC rule 3745-77-07(A)(13) and 40 CFR, Part 63, Subpart DDDDD]

C. Emissions Unit Terms and Conditions

1. P001, Pickling Line #1

Operations, Property and/or Equipment Description:

Pickling Line

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 P0120043, issued 1/12/16]	See b)(2)a.
b.	40 CFR Part 63, Subpart CCC (40 CFR Part 63.1155 – 63.1166)	18 parts per million, by volume, (ppmv) of HCl See b)(2)b.
c.	40 CFR Part 63, Subpart A	Table 1 to 40 CFR, Part 63, Subpart CCC – Applicability of General Provisions to Subpart CCC shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the HCl emitted from these emissions units. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. HCl is an air contaminant that does not involve an established NAAQS.

The potential to emit for this emissions unit is 53.4 tons HCl/year. Potential emissions were determined by summing the emissions from the four scrubbers. The emissions from each scrubber were determined by converting the limit of 18 ppmv of HCl from 40 CFR, Part 63, Subpart CCC based on a scrubber exhaust flow rate of 35,000 scfm, a scrubber exhaust temperature of 344 degrees Kelvin.

b. The permittee has chosen to demonstrate compliance with 40 CFR, Part 63.1158(a)(2)(i) by employing four scrubbers. The HCl concentration in the exhaust gases from the scrubbers shall not exceed 18 ppmv.

c) Operational Restrictions

(1) The emissions from the pickling line shall be vented to a wet scrubber system at all times the emissions unit is in operation. This system will typically consist of the operation of four wet scrubbers, with the exception of periods of time where one scrubber is not in operation for maintenance activities. In and of itself, the operation of the pickling line using three scrubbers will not be considered a malfunction under OAC rule 3745-15-06. These events shall be documented under the recordkeeping requirements of condition d)(2) below.

[OAC rule 3745-77-07(A)(1) and PTI P0120043]

(2) In accordance with 40 CFR, Part 63.6(e), the permittee shall operate the emissions unit, including the associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the standard at all times, including during any period of startup, shutdown, or malfunction. Malfunctions must be corrected as soon as practical after their occurrence in accordance with the startup, shutdown and malfunction plan [See Section g)(3)].

[OAC rule 3745-77-07(A)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

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 or limit for the pressure drop across each scrubber, the scrubber liquid flow rate for each scrubber and the scrubber liquid pH for each scrubber shall be based upon the latest performance stack testing results. The appropriate range for each parameter established to demonstrate compliance is as follows:

Parameters	Acceptable range for each scrubber
Scrubber liquid pH	5.5 - 12.0
Scrubber water makeup flow rate (gallons per minute)	1 (minimum)
Pressure drop (inches of water)	5.5 - 9.0
Scrubber liquid recirculation rate (gallons per minute)	100 (minimum)

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across each scrubber (in inches of water), the scrubber liquid flow rate (in gallons per minute), the scrubber water makeup flow rate (in gallons per

minute) and the scrubber liquid pH for each scrubber during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across each scrubber, the scrubber liquid flow rate for each scrubber, the scrubber water makeup flow rate for each scrubber and the scrubber liquid pH for each scrubber on a once per shift 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.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) 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 control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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, the scrubber liquid flow rate, the scrubber water makeup flow rate and the scrubber liquid pH 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.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

(3) These ranges and/or limits for the pressure drop, the scrubber liquid flow rate, the scrubber water makeup flow rate and the scrubber liquid pH are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop, the scrubber liquid flow rate, the scrubber water makeup flow rate or the scrubber pH based upon information obtained during future performance tests that demonstrate compliance with the allowable HCl emission rate for this emissions unit. 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 of the Title V permit.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

(4) In accordance with 40 CFR, Part 63.10(b)(2), the permittee shall maintain records of the following information and retain the records for 5 years from the date of each record:

a. The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);

b. The occurrence and duration of each malfunction of the air pollution control equipment;

c. All maintenance performed on the air pollution control equipment;

d. Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;

e. All information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form (see 40 CFR, Part 63.10(b)(2)(v));

f. All required measurements needed to demonstrate compliance with the standard and to support data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;

g. All results of initial or subsequent performance tests;

h. If the permittee has been granted a waiver from record keeping or reporting requirements under 40 CFR, Part 63.10(f), any information demonstrating

whether a source is meeting the requirements for a waiver of record keeping or reporting requirements;

i. The permittee has been granted a waiver from the initial performance test under 40 CFR, Part 63.7(h), a copy of the full request and the Administrator's approval or disapproval;

j. All documentation supporting initial notifications and notifications of compliance status required by 40 CFR, Part 63.9;

k. Records of any applicability determination, including supporting analyses and

l. The records for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

(5) The permittee shall keep the written operations and maintenance plan [See g)(3)] on record after it is developed to be made available for inspection, upon request by the Director, for the life of the facility. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Director for a period of 5 years after each revision to the plan.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across each scrubber, the scrubber liquid flow rate for each scrubber, the scrubber water makeup flow rate for each scrubber or the liquid pH for each scrubber was outside of the appropriate range or limit specified in this permit;

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 scrubber;

c. each incident of deviation described in e)(1)a. or e)(1)b. where a prompt investigation was not conducted;

d. each incident of deviation described in e)(1)a. or e)(1)b. where prompt corrective action, that would bring the pressure drop, the scrubber liquid flow rate or the scrubber liquid pH into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in e)(1)a. or e)(1)b. 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 the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI P0120043]

(2) In accordance with 40 CFR, Part 63.10(d)(5)(i), if actions taken by the permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the permittee shall state such information in a semiannual report. The report, to be certified by the permittee, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half.

[OAC rule 3745-77-07(C)(1) and PTI P0120043]

(3) Any time an action taken by a permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the permittee shall comply with all requirements of 40 CFR, Part 63.10(d)(5)(ii).

[OAC rule 3745-77-07(C)(1) and PTI P0120043]

(4) 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.

[OAC rule 3745-15-03(A)]

f) Testing Requirements

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

a. The emissions testing shall be conducted approximately 2.5 years after the effective date of this permit and within 6 months prior to this permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable outlet concentration for HCl.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Method 26A, "Determination of Hydrogen Halide and Halogen Emissions from Stationery Sources-Isokinetic Method." The minimum sampling time for each run shall be 60 minutes and the minimum sample volume shall be 0.85 dry standard cubic meters (30 dry standard cubic feet).

d. The concentrations of HCl shall be calculated for each run as follows:

C1HCl (ppmv) = 0.659 C2HCl (mg/dscm)

where:

C1HCl (ppmv) = the concentration of HCl, in ppmv

C2HCl (mg/dscm) = the concentration of HCl, in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A

0.659 = conversion factor

The permittee may use equivalent alternative measurement methods approved by the Director.

e. Compliance with the applicable concentration standard shall be determined by the average of three consecutive runs or by the average of any three of four consecutive runs. Each run shall be conducted under conditions representative of normal process operations.

f. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

g. During emission testing, the permittee shall also record the following information across each scrubber:

   i. the pH range for the scrubbing liquid;

   ii. the scrubber water flow rate, in gallons/minute;

   iii. the scrubber liquid recirculation rate, in gallons/minute; and

   iv. the scrubber pressure drop range.

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

i. Personnel from the Ohio EPA, Northwest District Office 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.

j. 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 Ohio EPA, Northwest District Office 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 Ohio EPA, Northwest District Office.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

(2) 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 Limitations:</u> HCl emissions shall not exceed 18 ppmv

<u>Applicable Compliance Method:</u> Compliance with the allowable outlet concentration shall be based upon the results of emission testing conducted in accordance with f)(1) above.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

g) Miscellaneous Requirements

(1) In delegating implementation and enforcement authority to a State under 40 CFR, Part 63, Subpart E, the following authorities shall be retained by the Administrator and not transferred to a State:

a. Approval of alternative emission standards to those standards specified in 40 CFR, Part 63.1157 and 63.1158.

b. Approval of alternative measurement methods for HCl to those specified in 40 CFR, Part 63.1161(d)(1).

c. Approval of alternative monitoring requirements to those specified in 40 CFR, Part 63.1162(a)(2) through 63.1162(a)(5) and 40 CFR Part 63.1162(b)(1) through 63.1162(b)(3).

d. Waiver of record keeping requirements specified in 40 CFR, Part 63.1165.

The following authorities shall be delegated to State: All other authorities, including approval of an alternative schedule for conducting performance tests to the requirement specified in 40 CFR, Part 63.1162(a)(1).

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

(2) In accordance with 40 CFR, Part 63.6(e)(3), the permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

(3) The permittee shall comply with the operation and maintenance requirements in 40 CFR, Part 63.6(e). In addition to these requirements, the permittee shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date. The plan shall be incorporated by reference into the Title V permit. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:

a. Require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance.

b. Require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans.

c. Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling.

d. Require an inspection of each scrubber at intervals of no less than 3 months with:

i. Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices.

ii. Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components.

iii. Repair or replacement of droplet eliminator elements as needed.

iv. Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber.

v. Adjustment of damper settings for consistency with the required air flow.

e. If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternative means of inspection approved by the Administrator may be used.

f. The permittee shall initiate procedures for corrective action within 1 working day of detection of any operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan.

g. The permittee shall maintain a record of each inspection, including each item identified in condition g)(3)d., that is signed by the responsible maintenance official and that shows the date of each inspection, the problem that was identified, and a description of the repair, replacement or other corrective action taken.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

2. **P0**13, Pickling Line #2

Operations, Property and/or Equipment Description:

Pickling Line #2 - Cleaning and coating of wire and rod in coil form

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), as effective 11/30/01 [PTI P0120043, issued 1/12/16]	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06 [PTI P0120043, issued 10/01/13]	See b)(2)b.
c.	40 CFR, Part 63, Subpart CCC (40 CFR Part 63.1155 – 63.1166)	18 parts per million, by volume, (ppmv) of HCl See b)(2)c.
d.	40 CFR 63.1 - 15 (40 CFR Part 63.1155)	Table 1 to 40 CFR, Part 63, Subpart CCC – Applicability of General Provisions to Subpart CCC shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

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

December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the HCl emitted from these emissions units. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. HCl is an air contaminant that does not involve an established NAAQS.

The potential to emit for this emissions unit is 53.40 tons HCl/year. Potential emissions were determined by summing the emissions from the four scrubbers. The emissions from each scrubber were determined by converting the limit of 18 ppmv of HCl from 40 CFR, Part 63, Subpart CCC based on a scrubber exhaust flow rate of 35,000 scfm, a scrubber exhaust temperature of 344 degrees Kelvin.

c. The permittee has chosen to demonstrate compliance with 40 CFR, Part 63.1158(a)(2)(i) by employing four scrubbers. The HCl concentration in the exhaust gases from the scrubbers shall not exceed 18 ppmv.

c) Operational Restrictions

(1) The emissions from the pickling line shall be vented to a wet scrubber system at all times the emissions unit is in operation. This system will typically consist of the operation of four wet scrubbers, with the exception of periods of time where one scrubber is not in operation for maintenance activities. In and of itself, the operation of the pickling line using three scrubbers will not be considered a malfunction under OAC rule 3745-15-06. These events shall be documented under the recordkeeping requirements of condition d)(2) below.

[OAC rule 3745-77-07(A)(1) and PTI P0120043]

(2) In accordance with 40 CFR, Part 63.6 (e), the permittee shall operate the emissions unit, including the associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the standard at all times, including during any period of startup, shutdown, or malfunction. Malfunctions must be corrected as soon as practical after their occurrence in accordance with the startup, shutdown and malfunction plan [See Section g)(3)].

[OAC rule 3745-77-07(A)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

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 or limit for the pressure drop across each scrubber, the scrubber liquid flow rate for each scrubber and the scrubber liquid pH for each scrubber shall be based upon the latest performance stack testing results. The appropriate range for each parameter established to demonstrate compliance is as follows:

Parameters	Acceptable range for each scrubber
Scrubber liquid pH	5.5 - 12.0
Scrubber water makeup flow rate (gallons per minute)	1 (minimum)
Pressure drop (inches of water)	5.5 - 9.0
Scrubber liquid recirculation rate (gallons per minute)	100 (minimum)

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across each scrubber (in inches of water), the scrubber liquid flow rate for each scrubber (in gallons per minute) and the scrubber liquid pH for each scrubber during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across each scrubber, the scrubber liquid flow rate for each scrubber and the scrubber liquid pH for each scrubber on a once per shift basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop across each scrubber, the scrubber liquid flow rate for each scrubber and the scrubber liquid pH for each scrubber shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) 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 control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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, the scrubber liquid flow rate and the scrubber liquid pH 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.

These ranges and/or limits for the pressure drop, the scrubber liquid flow rate and the scrubber liquid pH are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop, the scrubber liquid flow rate or the scrubber pH based upon information obtained during future performance tests that demonstrate compliance with the allowable HCl emission rate for this emissions unit. 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 of the Title V permit.

[OAC rule 3745-77-07(C)(1) and PTI P0120043]

(3) In accordance with 40 CFR, Part 63.10 (b)(2), the permittee shall maintain records of the following information and retain the records for 5 years from the date of each record:

a. The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);

b. The occurrence and duration of each malfunction of the air pollution control equipment;

c. All maintenance performed on the air pollution control equipment;

d. Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;

e. All information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form (see 40 CFR, Part 63.10 (b)(2)(v));

f. All required measurements needed to demonstrate compliance with the standard and to support data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;

g. All results of initial or subsequent performance tests;

h. If the permittee has been granted a waiver from record keeping or reporting requirements under 40 CFR, Part 63.10 (f), any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements;

i. the permittee has been granted a waiver from the initial performance test under 40 CFR, Part 63.7 (h), a copy of the full request and the Administrator's approval or disapproval;

j. All documentation supporting initial notifications and notifications of compliance status required by 40 CFR, Part 63.9;

k. Records of any applicability determination, including supporting analyses and

l. The records for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

(4) The permittee shall keep the written operations and maintenance plan [See g)(3)] on record after it is developed to be made available for inspection, upon request by the Director, for the life of the facility. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Director for a period of 5 years after each revision to the plan.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

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.

[OAC rule 3745-15-03(A)]

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

a. each period of time (start time and date, and end time and date) when the pressure drop across each scrubber, the scrubber liquid flow rate for each scrubber or the scrubber liquid pH for each scrubber was outside of the appropriate range or limit specified by the manufacturer and outside of the acceptable range for each parameter following any required compliance demonstration;

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 scrubber;

c. each incident of deviation described in e)(2)a. or e)(2)b. where a prompt investigation was not conducted;

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

e. each incident of deviation described in e)(2)a. or e)(2)b. 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 the Standard Terms and Conditions of this permit.

[OAC 3745-77-07(C)(1), and PTI P0120043]

(3) In accordance with 40 CFR, Part 63.10 (d)(5)(i), if actions taken by the permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the permittee shall state such information in a semiannual report. The report, to be certified by the permittee, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

(4) Any time an action taken by a permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the permittee shall comply with all requirements of 40 CFR, Part 63.10 (d)(5)(ii).

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

f) Testing Requirements

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

a. The emissions testing shall be conducted approximately 2.5 years after the effective date issuance of this permit and within 6 months prior to this permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable outlet concentration for HCl.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Method 26A, "Determination of Hydrogen Halide and Halogen Emissions from Stationery Sources-Isokinetic Method." The minimum sampling time for each run shall be 60 minutes and the minimum sample volume shall be 0.85 dry standard cubic meters (30 dry standard cubic feet).

d. The concentrations of HCl shall be calculated for each run as follows:

C1HCl (ppmv) = 0.659 C2HCl (mg/dscm)

where: C1HCl (ppmv) = the concentration of HCl, in ppmv

C2HCl (mg/dscm) = the concentration of HCl, in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A

0.659 = conversion factor

The permittee may use equivalent alternative measurement methods approved by the Director.

e. Compliance with the applicable concentration standard shall be determined by the average of three consecutive runs or by the average of any three of four consecutive runs. Each run shall be conducted under conditions representative of normal process operations.

f. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

g. During emission testing, the permittee shall also record the following information:

i. the pH range for the scrubbing liquid;

ii. the scrubber water flow rate, in gallons/minute; and

iii. the scrubber pressure drop range.

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

i. Personnel from the Ohio EPA, Northwest District Office 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.

j. 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 Ohio EPA, Northwest District Office 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 Ohio EPA, Northwest District Office.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart CCC and PTI P0120043]

(2) Compliance with the emissions limitations in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u> 18 ppmv of HCl

<u>Applicable Compliance Method:</u> Compliance with the allowable emission limitation above shall be based upon the results of emission testing conducted in accordance with f)(1) above.

[OAC rule 3745-77-07(C)(1) and PTI P0120043]

g) Miscellaneous Requirements

(1) In delegating implementation and enforcement authority to a State under 40 CFR, Part 63, Subpart E, the following authorities shall be retained by the Administrator and not transferred to a State:

a. Approval of alternative emission standards to those standards specified in 40 CFR, Part 63.1157 and 63.1158.

b. Approval of alternative measurement methods for HCl to those specified in 40 CFR, Part 63.1161(d)(1).

c. Approval of alternative monitoring requirements to those specified in 40 CFR, Part 63.1162(a)(2) through 63.1162 (a)(5) and 63.1162 (b)(1) through 63.1162 (b)(3).

d. Waiver of record keeping requirements specified in 40 CFR, Part 63.1165.

The following authorities shall be delegated to State: All other authorities, including approval of an alternative schedule for conducting performance tests to the requirement specified in 40 CFR, Part 63.1162 (a)(1).

[40 CFR, Part 63, Subpart CCC, OAC 3745-77-07(C) and PTI P0120043]

(2) In accordance with 40 CFR, Part 63.6 (e)(3), the permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard.

[40 CFR, Part 63, Subpart CCC, OAC rule 3745-77-07(C)(1) and PTI P0120043]

(3) The permittee shall comply with the operation and maintenance requirements in 40 CFR, Part 63.6 (e). In addition to these requirements, the permittee shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date. The plan shall be incorporated by reference into the Title V permit. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:

a. Require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance.

b. Require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans.

c. Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling.

d. Require an inspection of each scrubber at intervals of no less than 3 months with:

i. Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices.

ii. Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components.

iii. Repair or replacement of droplet eliminator elements as needed.

iv. Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber.

v. Adjustment of damper settings for consistency with the required air flow.

e. If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternative means of inspection approved by the Administrator may be used.

f. The permittee shall initiate procedures for corrective action within 1 working day of detection of any operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan.

g. The permittee shall maintain a record of each inspection, including each item identified in condition g)(3)d., that is signed by the responsible maintenance official and that shows the date of each inspection, the problem that was identified, and a description of the repair, replacement or other corrective action taken.

[40 CFR, Part 63, Subpart CCC, OAC rule 3745-77-07(C) and PTI P0120043]

3. P901, Shotblast Unit #1

Operations, Property and/or Equipment Description:

Shotblast with 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) 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(F) [PTI P0110342, issued 07/13/12]	8.37 tons of fugitive particulate emissions (PE) per year Visible fugitive particulate emissions (PE) from this emissions unit shall not exceed 20% opacity, as a three-minute average. 1.07 lbs of PE per hour and 4.69 tons of PE per year Visible PE from any stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average. See b)(2)a., b)(2)d. and c)(1)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 [PTI P0110342, issued 07/13/12]	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06 [PTI P0110342, issued 07/13/12]	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)e.
e.	OAC rule 3745-17-07(B)	See b)(2)g.
f.	OAC rule 3745-17-08(B)	See b)(2)h.
g.	OAC rule 3745-17-11	See b)(2)f.
h.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(1) through d)(7), e)(1) and e)(2)

(2) Additional Terms and Conditions

a. This permit establishes legally and practically enforceable emission limitations in b)(1)a. for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions that require control equipment as contained in c)(1).

b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [see b)(2)a.].

It should be noted that the voluntary restrictions were also established with the intentional purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [see b)(2)c.].

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

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

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

Best Available Technology (BAT) requirements under OAC rule 3745-05(A)(3)(a) do not apply to the PM_{10} emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

d. All PE are assumed to be particulate matter 10 microns or less in size (PM_{10}).

e. The visible emission limit established by this rule is less stringent than the visible emission limit established in accordance with OAC rule 3745-31-05(F).

f. The emission limit established by this rule is less stringent than the emission limit established in accordance with OAC rule 3745-31-05(F).

g. This emissions unit is exempt from the visible fugitive particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

h. This facility is not located within an Appendix A area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

(1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.]:

a. the use of a baghouse system, whenever this air contaminant source is in operation, with a maximum outlet grain loading of 0.01 grain PE per dry standard cubic foot (gr PE/dscf).

[OAC 3745-77-07(A)(1) and PTI P0110342]

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the baghouse controlling this emissions unit is the daily visible emission checks. When the daily visible emission checks show operation outside its normal or usual manner of operation, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practical in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Sections e)(1) and e)(2) below. 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 shall not be configured to have bypass capability.

[OAC 3745-77-07(C)(1) and 40 CFR Part 64]

(2) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

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

(3) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, 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, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 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 baghouse or emissions unit. In addition to periodic monitoring of the baghouse operating parameters, the permittee also has an inspection and maintenance program for the baghouse, including but not limited to:

a. checking the bags/filters for deterioration or degradation;

b. checking the cleaning system for proper operation; and

c. checking the hoppers and conveyance systems for proper operation.

Based on the results of the monitoring and inspection program, repairs to the baghouse shall be made as needed. If the current CAM indicators and/or the baghouse inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC 3745-77-07(C)(1) and 40 CFR Part 64]

(5) The permittee shall maintain a supply of replacement parts necessary to ensure ongoing proper operation of the baghouse system, including, but not limited to:

a. filter bags;

b. timing boards and solenoid coils (for blow down function);

c. diaphragms and diaphragm seal kits;

d. spare set of belts; and

e. spare bearings for blower motor.

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

(6) 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 serving this emissions unit. 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:

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 emissions incident; and

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

[OAC 3745-77-07(C)(1), PTI P0110342 and 40 CFR Part 64]

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

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

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

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

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

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d)(2)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC 3745-77-07(C)(1), PTI P0110342 and 40 CFR Part 64]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

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

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

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

[OAC 3745-77-07(C)(1), PTI P0110342 and 40 CFR Part 64]

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

a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

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

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

[OAC 3745-77-07(C)(1), PTI P0110342 and 40 CFR Part 64]

(3) 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.

[OAC rule 3745-15-03(A)]

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>Emissions Limitation:</u>
0.01 gr PE/dscf

<u>Applicable Compliance Method:</u>
The gr PE/dscf emission limitation was established in accordance with the maximum outlet concentration for the baghouse. If required, compliance with the gr PE/dscf emission limitation shall be based on stack testing using the methods and procedures specified in Methods 1-4 and Method 5 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1), and PTI P0110342]

b. <u>Emissions Limitations:</u>
1.07 lbs PE/hr, 4.69 tons PE/yr

<u>Applicable Compliance Method:</u>
Compliance with the lbs/hr and tons/yr limits shall be determined by multiplying the maximum outlet grain loading concentration of 0.01 gr/dscf by the maximum volumetric air flow of 12,500 dscfm, and the appropriate conversion factors of 7000 grains/lb, 60 minutes/hr, 1 ton/2000 lbs, and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-4 and Method 5 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1), and PTI P0110342]

c. Emissions Limitation:
Visible PE shall not exceed 5% opacity, as a 6-minute average.

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

[OAC rule 3745-77-07(C)(1), and PTI P0110342]

d. Emissions Limitation:
8.37 tons fugitive PE per year

Applicable Compliance Method:
The permittee shall demonstrate compliance with the allowable emission limitation above by multiplying the maximum process weight (108,098 tons iron/yr) by the appropriate emissions factor from An Inventory of Iron Foundry Emissions, Bernard S. Gutow, Modern Castings, January 1972 (15.5 lbs PE/ton), the percentage of emissions not captured by the control system (99.0%) and a conversion factor of 1 ton/2000 lbs.
[OAC rule 3745-77-07(C)(1), and PTI P0110342]

e. Emissions Limitation:
Visible particulate fugitive emissions from this emissions unit shall not exceed 20% opacity, as a 3-minute average.

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

[OAC rule 3745-77-07(C)(1), and PTI P0110342]

g) Miscellaneous Requirements

(1) None.