

Facility ID: 1409041019 Issuance type: Final State Permit To Operate

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

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

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

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

Facility ID: 1409041019 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Steel Wire Drawing Line #1, including dust collector	OAC rule 3745-31-05(C) (PTI 14-05960)	See term and condition A.2.a.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) shall not exceed 4.10 pounds per hour.
	OAC rule 3745-17-07(B)(1)	See term and condition A.2.b.
	OAC rule 3745-17-08(B)(3)	See terms and conditions A.2.c and A.2.d.

2. Additional Terms and Conditions

- (a) The permit for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - i. for Particulate Emissions (PE) and Particulate Matter emissions 10 microns and less in diameter (PM10): the permittee shall install, operate and maintain a fabric filter baghouse (dust collector) on this emissions unit.
The visible particulate emissions from any fugitive dust source shall not exceed 20 percent opacity, as a three-minute average.
The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent.
The fugitive dust from this emissions unit shall be controlled by the use of reasonably available control measures adequate to minimize or eliminate visible particulate emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable pressure drop range specified below, 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: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred. The acceptable range for the pressure drop across the baghouse shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted. This range is 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 pressure drop range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the pressure drop range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing the following deviations from the terms and conditions specified in Section C.1:
 - a. each period of time when the pressure drop across the baghouse was outside of the range specified by the manufacturer;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month in which the deviation occurred.

E. Testing Requirements

1. Compliance with the emission limitations specified in Section A of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

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

Acceptable Compliance Method:

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

Emission Limitation:

Particulate emissions (PE) shall not exceed 4.10 pounds per hour.

Acceptable Compliance Method:

The hourly particulate emission limitation is based on Table I in OAC rule 3745-17-11 using a process weight rate (PWR) of 1 ton of steel wire per hour.

To determine the worst case PE rate, the following equation shall be used:

$E = (\text{maximum uncontrolled emissions rate, in pounds per hour}) \times (1 - CE)$,
where

$E = \text{PE rate (lbs/hr); and}$

$CE = \text{fractional control efficiency of the control equipment (fabric filter) on the emissions unit (0.98) } \times \text{ fractional capture efficiency of the control equipment (0.995).}$

If required, compliance with this mass emission limitation shall be based on stack testing pursuant to OAC rule 3745-17-03(B)(10), (USEPA Method 1-5, 40 CFR Part 60, Appendix A).

Emission Limitation:

Voluntary restriction, including the use of a control device, which maintains the PE and PM10 emissions to less than 10 tons per year.

Acceptable Compliance Method:

The annual PE and PM10 emissions restriction established through OAC rule 3745-31-05(C) was developed from the following equations using the information submitted by the permittee in PTI Application 14-05960, submitted on July 12, 2007:

$[(9.97 \text{ lbs maximum uncontrolled iron oxide particulate/hour} \times (1 - .995 \text{ capture efficiency})) \times 8760 \text{ hours/year} \times 1 \text{ Ton}/2000 \text{ lbs}] = 0.2 \text{ TPY of PE/PM10 from fugitive emissions;}$

$[(9.97 \text{ lbs maximum uncontrolled iron oxide particulate/hour} - 0.05 \text{ lb fugitive iron oxide particulate/hour}] \times (1 - .98 \text{ fabric filter control efficiency}) \times 8760 \text{ hours/year} \times 1 \text{ Ton}/2000 \text{ lbs} = 0.9 \text{ TPY PE/PM10 from dust collector stack;}$

Total PE/PM10 emissions considering voluntary restriction = 1.1 TPY

Emission Limitation:

The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent.

Applicable Compliance Method:

If required, compliance with OAC rule 3745-17-08 shall be based on stack testing pursuant to OAC rule 3745-17-03(B)(10), (USEPA Method 1-5, 40 CFR Part 60, Appendix A) or shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

Emission Limitation:

Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average, except as provided by the rule.

Applicable Compliance Method:

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

F. Miscellaneous Requirements

1. None