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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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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**Part II - Specific Facility Terms and Conditions**

a **State and Federally Enforceable Section**

1. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

2. The permittee shall demonstrate compliance with the sulfur dioxide (S02) National Ambient Air Quality Standard (NAAQS) based on the combined S02 emissions from all fuel burning emissions units, as permitted herein, using air dispersion modeling. If attainment with the S02 NAAQS cannot be demonstrated, then the permittee may propose an S02 emission strategy, which includes, but is not limited to, emission limitations and/or operating restrictions for the use of fuel oil in these emissions units that will sufficiently restrict S02 emissions for the purpose of complying with the S02 NAAQS. The emission strategy shall be confirmed by air dispersion modeling. The written strategy shall be submitted to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) and Ohio EPA, Central Office for approval along with all support documentation including the basis for the strategy, the emission limitations and/or operating restrictions and the model input information and results within six (6) months of the effective date of this permit. All air dispersion modeling will be conducted using the approved USEPA air dispersion models under a protocol currently approved by the Ohio EPA.

3. The following insignificant emissions units are located at this facility:

   F001 - roadways and parking lots;
   P025 - Heat Treat Furnace OF07;
   P043 - Heat Treat Furnace OF10 (PTI 15-201);
   Z001 - Heat Treat Furnace OF11; and
   Z005 - lime silo.

   Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

4. Facility-wide HAP Emission Limitations:

   The pemittee has requested voluntary emission limitations pursuant to OAC rule 3745-77-07(B)(1) in order to qualify as a synthetic minor source for Hazardous Air Pollutants (HAPs) and avoid the requirements of 40 CFR Part 63, Subpart DDDDD (i.e., the Boiler MACT). Accordingly, this permit establishes the following federally enforceable restrictions:

   a. The emissions of HAPs from all fuel burning emissions units and all other HAP-emitting sources at the facility shall not exceed 9.0 tons per year for any individual HAP, and 24.0 tons per year for total combined HAPs, based on a rolling, 12-month summation of the monthly emissions.

   b. The fuel burning emissions units at this facility include the following: B001, B002, B003, P001 through P007, P009, P010, P016, P017, P019, P020, P021, P024, P026, P027, P039, P040, P041, and P046. HAP emissions for the facility shall also include any deminimus air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit.

5. Facility-Wide Operational Restrictions:

   To ensure enforceability of the HAP emission limits during the first 12 calendar months following issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

   . TABLE 5-1

   . Maximum Allowable Maximum Allowable
   . Cumulative Emissions Cumulative Emissions
   Month(s) of Individual HAP (Tons) of Combined HAPs (Tons)

   1 2.5 6.5

1-2 2.5 6.5
1-3 2.5 6.5
1-4 5.0 13.0
1-5 5.0 13.0
1-6 5.0 13.0
1-7 7.5 20.0
1-8 7.5 20.0
1-9 7.5 20.0
1-10 9.0 24.0
1-11 9.0 24.0
1-12 9.0 24.0

After the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitations for individual and combined HAPs shall be based upon a rolling, 12-month summation of the monthly emissions.

6. Facility-Wide Monitoring and Record Keeping Requirements

a. This permit establishes federally enforceable emission limitations for HAPs as set forth in Section A.5. For the purpose of establishing compliance with the combined HAP emission limitations in Table 5-1, the permittee shall monitor and record facility-wide hydrogen chloride (HCl) emissions. Hydrogen chloride is the predominant individual HAP emission from the fuel burning equipment, therefore total facility-wide HCl emissions shall be presumed to be equal to total facility-wide combined HAP emissions.

b. Emissions of combined HAPs (excluding HCl) from the fuel burning emissions units, and combined HAPs from the deminimus and permanent exemption air contaminant sources are estimated to be less than 1.0 ton per year, therefore no additional monitoring or record keeping is required for combined HAPs (excluding HCl) from the fuel burning emissions units or combined HAPs from the deminimus and permanent exemption air contaminant sources.

c. The permittee shall collect or require the coal supplier to collect weekly representative samples of the coal burned at the facility. The permittee shall perform, or require the supplier to perform, the coal sampling and analyze each weekly representative sample of coal for chlorine content (percent by weight) and heat content (Btu/pound of coal) in accordance with approved ASTM methods. The analytical methods for chlorine content shall be in accordance with the most recent version of SW-846-9250. The permittee shall apply the results of the analyses of the weekly representative sample to the weight of coal received that week to calculate the weighted average for chlorine content and heat content on a monthly basis. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.
d. For each shipment of oil received for burning at the facility, the permittee shall maintain records of the total quantity of oil received in gallons, the permittee's or oil supplier's analyses for chlorine content (percent by weight), heat content (Btu/gallon), and density of the oil. The permittee shall perform or require the supplier to perform the analyses for chlorine content, heat content, and density of the oil in accordance with approved ASTM methods. The analytical methods for chlorine content shall be in accordance with the most recent version of SW-846-9250. The permittee shall apply the results of the analyses of each oil shipment to calculate a weighted average for chlorine content, heat content and density on a monthly basis. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

e. The permittee shall maintain monthly records of the following information:

i. The results of each fuel analysis for chlorine and heat contents for coal and chlorine and heat contents and density for oil from A.6.c and A.6.d above.

ii. The HCl emission factor for coal (HCl coal), using the monthly-weighted average chlorine content and heating value from the coal analyses and calculated as follows:

HCl coal, lb HCl / mmBTU = (lb Cl / lb coal) x (36 lb HCl /35 lb Cl) / (coal heating value, mmBTU/lb) x (1 - CE/100)

where CE is the overall control efficiency for HCl, in percent, for the wet scrubber serving the coal-fired emissions unit B001 (assumed as 87.8 %), or the control efficiency as determined during the most recent emission test that demonstrated the emissions unit was in compliance.

iii. The HCl emission factor for fuel oil (HCl oil), using the monthly-weighted average chlorine content and heating value from the oil analyses and calculated as follows:

HCl oil, lb HCl / mmBTU = (lb Cl / lb oil) x (36 lb HCl /35 lb Cl) / (oil heating value, mmBTU/gal)
iv. The total monthly amount of each fuel burned (coal and fuel oil) in all fuel burning emissions units, in tons per month for coal, and in gallons per month for oil.

v. The monthly HCl emissions from coal = (coal used, lbs/month) x (weighted average heat content, mmBtu / lb) x (HCl coal, from (ii)) x 1 ton HCl / 2000 lb HCl.

vi. The monthly HCl emissions from fuel oil = (oil used, gallons/month) x (weighted average heat content, mmBtu / gallon) x HCl oil, from (iii)) x 1 ton HCl / 2000 lb HCl.

vii. The total HCl emissions from all fuels burned (coal and fuel oil), in tons / month calculated as the sum of (v) plus (vi).

viii. For the first 12 calendar months following the issuance of this permit, the cumulative year-to-date total HCl emissions, in tons from all fuels burned (coal and fuel oil).

ix. Beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of total HCl emissions from all fuels burned (coal and fuel oil).

7. Reporting Requirements

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

i. For the first 12 calendar months following the issuance of this permit, all exceedances of the monthly emission limitations of individual and combined HAP (as HCl) specified in Section A.5.

ii. After the first 12 calendar months following the issuance of this permit, all exceedances of the rolling, 12-month emission limitations of individual and combined HAP (as HCl) specified in Section A.5.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

b. The permittee shall submit annual reports that summarize the actual facility-wide total individual and combined HAP emissions from all HAP-emitting sources at the facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

c. The permittee shall also submit annual reports that list any deminimus air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

8. Testing Requirements

Compliance with the facility-wide HAP emission limitations in Section A.4 of these terms and conditions shall be determined based on the record keeping requirements specified in Section A.6.

If required, the assumed control efficiency (87.8%) for HCl of the wet scrubber serving the coal-fired boiler (B001) shall be demonstrated through emission testing in accordance with Method 26A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

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b **State Only Enforceable Section**

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Z003 - coal handling;
Z004 - ash handling;
Z006 - Tank No. 6;
Z007 - Tank No. 7;
Z008 - Tank No. 8;
Z009 - Tank No. 9;
Z010 - oil quenching;
Z011 - die polishing;
Z012 - Parts Washer No. 1;
Z013 - Parts Washer No. 2;
Z014 - Hammer Location A;
Z015 - Hammer Location B;
Z016 - Hammer Location C;
Z017 - Hammer Location D;
Z018 - Hammer Location E;
Z019 - Hammer Location F;
Z020 - Hammer Location G;
Z021 - Hammer Location H;
Z022 - Hammer Location I;
Z023 - Hammer Location J;
Z024 - Hammer Location K;
Z025 - Hammer Location L;
Z026 - Hammer Location M; and
Z027 - Tank No. 18.

2. The permittee shall maintain monthly records of the amount (in gallons) of cylinder oil employed in emissions units Z014 through Z026.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the process steam exhaust stack serving emissions units Z014 through Z026. 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 location and color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

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

incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

4. The permittee shall submit quarterly written reports that identify the following:

a. the amount (in gallons) of cylinder oil employed in emissions units Z014 through Z026 during each calendar month;

b. an identification of all days during which any visible particulate emissions were observed from the stack serving emissions units Z014 through Z026; and

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

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

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Go to Part III for Emissions Unit P010
Go to Part III for Emissions Unit P016
Go to Part III for Emissions Unit P017
Go to Part III for Emissions Unit P019
Go to Part III for Emissions Unit P020
Go to Part III for Emissions Unit P021
Go to Part III for Emissions Unit P024
Go to Part III for Emissions Unit P026
Go to Part III for Emissions Unit P027
Go to Part III for Emissions Unit P032
Go to Part III for Emissions Unit P033
Go to Part III for Emissions Unit P034
Go to Part III for Emissions Unit P035
Go to Part III for Emissions Unit P036
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**Part III - Terms and Conditions for Emissions Units**

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**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| B&W Sterling Class 131 No. 24 coal-fired spreader stoker boiler, maximum heat input of 86 mmBtu/hr, controlled by a venturi wet scrubber (OP01) with a limestone injection system to control sulfur dioxide emissions - Boiler No. 1 | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |
| | OAC rule 3745-17-10(C)(1) | 0.150 pound of particulate emissions per mmBtu of actual heat input |
| | OAC rule 3745-18-82(B)(1) | 5.0 pounds of SO2 per mmBtu actual heat input. (See A.II.1.d below). |

OAC rule 3745-18-82(B)(2) See A.I.2.a below.

2. **Additional Terms and Conditions**

a. The stack height for this emissions unit shall be a minimum of 147.5 feet.

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II. **Operational Restrictions**

1. The quality of the coal burned in this emissions unit shall meet the following specifications, on a dry basis:

a. the coal shall have an ash content of less than 16%;

b. the coal shall have a sulfur content which is sufficient to comply with the allowable SO2 emission limitation of 5.0 pounds of SO2 per mmBtu of actual heat input;

c. the coal shall have a heat content of no less than 11,000 Btu per pound of coal; and

d. OAC rule 3745-18-82(B)(1) further requires that the permittee shall limit the maximum heat input rate of this emissions unit not to exceed a maximum of 86 mmBtu/hour as a 3-hour average and 62.5 mmBtu/hour as a 24-hour average.

2. The permittee shall operate the venturi wet scrubber in accordance with the following parameters:

a. the pressure drop range across the scrubber shall be continuously maintained at a value of not less than 8 inches of water, at all times while the emissions unit is in operation;

b. the fresh water nozzle flow rate shall be continuously maintained at a value of not less than 30 gallons per minute, at all times while the emissions unit is in operation; and

c. the scrubber water supply pressure shall be continuously maintained at a value of not less than 38 pounds per square inch guage (psig), at all times while the emissions unit is in operation.

After each test required in section A.V.2, the permittee may petition the CCHD, APCD to reestablish the above operating parameters provided the permittee can demonstrate to the satisfaction of the CCHD, APCD that the operating conditions upon which the parameters were previously established are no longer applicable.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect or require the coal supplier to collect weekly a representative sample of coal burned in this emissions unit. The permittee shall perform, or require the supplier to perform, the coal sampling and analyze each weekly representative sample of coal for ash content (percent by weight), sulfur content (percent by weight), and heat content (Btu/pound of coal) in accordance with either 40 CFR Part 60, Appendix A, Method 19 or the proper ASTM methods. The permittee shall apply these analyses of the weekly representative samples to the weights of coal received that week and calculate a weighted average for these parameters on a monthly basis. Alternative, equivalent methods may be used upon written approval from the CCHD, APCD.

2. The permittee shall maintain monthly records of the following information:

a. total amount (in tons) of coal received;

b. the results of the analyses for sulfur content (in percent, by weight), heat content (in Btu/pound of coal), and ash content (in percent, by weight); and

c. the calculated, controlled SO2 emission rate (in pound(s)/mmBtu) based upon a weighted average of the calculated SO2 emission rates for all shipments of coal during a calendar month and the SO2 reduction (control) efficiency measured and recorded from the most recent emission tests, performed in accordance with the methods and procedures specified in section A.V, that demonstrated compliance with the SO2 emission limitation specified in section A.I.

3. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the scrubber, the scrubber fresh water nozzle flow rate, and the scrubber water supply pressure while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day while the emissions unit is in operation:

a. the pressure drop across the scrubber, in inches of water, on a twice per shift basis;

b. the scrubber fresh water nozzle flow rate, in gallons per minute, on a twice per shift basis;

c. the scrubber water supply pressure, in psig, on a twice per shift basis; and

d. the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

All readings shall be taken twice per shift with at least 2 hours between readings.

4. The permittee shall perform weekly visible particulate emissions 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 when "fire cleaning" (i.e., removing the ash from the grate) is performed.

   The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall perform visible emissions observations in accordance with 40 CFR Part 60, Appendix A, Method 9 for a minimum of 30 minutes. The permittee shall also document any corrective actions taken to minimize or eliminate the visible particulate emissions in the operations log.

   For the emission point for which the weekly checks show emissions that are representative of normal operation for 24 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly (once per calendar month, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to weekly for that emission point until such time as there are 24 consecutive operating weeks of normal visible emissions.

5. The permittee shall operate and maintain a continuous steam flow rate monitoring device and recorder which measures and records the steam flow rate from this emissions unit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The steam flow rate monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall maintain all records describing any maintenance conducted on the steam flow rate monitoring and recording devices.

6. The permittee shall maintain daily records of the hourly average heat input for this emissions unit. (The monthly weighted heat content for the coal, from Section A.III.2, may be used to back calculate the hourly average heat input.)

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IV. **Reporting Requirements**

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

   a. all exceedances of the coal ash content limitation specified in section A.II.1;

   b. all exceedances of the coal heat content limitation specified in section A.II.1;

   c. all exceedances of the SO2 emission limitation specified in section A.I.1;

   d. all periods of time during which the pressure drop across the scrubber was not maintained at or above the level specified in section A.II.2;

   e. all periods of time during which the scrubber fresh water nozzle flow rate was not maintained at or above the level specified in section A.II.2;

   f. all periods of time during which the scrubber water supply pressure was not maintained at or above the level specified in section A.II.2; and

   g. all exceedances of the 3-hour or 24-hour average maximum heat input rate restrictions for this emissions unit.

   The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall submit semiannual written reports that (a) identify all times during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) provide copies of any Method 9 observations performed when visible particulate emissions were observed, and (c) describe any corrective actions taken to minimize or eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

   a. Emission Limitation:

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

      Applicable Compliance Method:

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

   b. Emission Limitation:

0.150 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing required pursuant to section A.V.2.

c. Emission Limitation:

5.0 pounds of SO2 per mmBtu of actual heat input

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated based upon the records required pursuant to section A.III and the emission testing required pursuant to section A.V.2.

d. Operational Restriction:

Maximum heat input not to exceed 86 mmBtu/hr as a 3-hr average, and 62.5 mmBtu/hr as a 24-hr average

Applicable Compliance Method:

Compliance with this operating restriction shall be demonstrated based on the records required pursuant to section A.III.

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

a. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable visible particulate emission limitation, the particulate mass emission limitation, and the SO2 mass emission limitation.

c. The following parameters also shall be monitored and recorded, on a 15-minute basis, during the emission testing: the pressure drop across the scrubber, the scrubber fresh water nozzle flow rate, and the scrubber water supply pressure.

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

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

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

iii. for the SO2 mass emission limitation, Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A.

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

f. The permittee shall conduct two (2) sampling runs during "fire cleaning" episodes and two (2) sampling runs during normal boiler operation.

g. The permittee shall not conduct any maintenance, other than for routine maintenance, to maintain boiler operation or for safety purposes on the emissions unit, the scrubber system, or any of it's appurtenances for a period of three (3) months prior to the test.
Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CCHD, APCD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the CCHD, APCD's refusal to accept the results of the emission test(s).

Personnel from the CCHD, APCD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the CCHD, APCD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the CCHD, APCD.

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VI. **Miscellaneous Requirements**

1. The permittee shall comply with the procedures specified in the document entitled "Powerhouse Preventative Maintenance Plan for Boiler #1" as submitted to the CCHD, APCD on May 5, 2003. The plan may be

modified as long as the CCHD, APCD has provided written approval of the proposed changes.

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**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: B002 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| B&W Sterling Class 131 No. 24 natural gas and fuel oil (No. 6 or better) fired boiler, maximum heat input of 88 mmBtu per hour - Boiler No. 2 | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |
| | OAC rule 3745-17-10(C)(1) | 0.150 pound of particulate emissions per mmBtu actual heat input |
| | OAC rule 3745-18-82(B)(3) | 2.5 pounds of SO2 per mmBtu actual heat input |

2. **Additional Terms and Conditions**

(a) None

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II. **Operational Restrictions**

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

2. The quality of the oil burned in this emissions unit shall have a combination of heat and sulfur content which is sufficient to comply with the allowable SO2 emission limitation.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any stack serving this emissions unit. The presence or absence of any visible emissions 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 emission incident; and
   e. any corrective actions taken to minimize or eliminate the visible emissions.

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

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content, heat content, and density of the oil, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

   The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, equivalent methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

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

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IV. **Reporting Requirements**

1. The permittee shall submit semiannual written reports that (a) identify all days when this emissions unit was burning fuel oil (No. 4, 5, and/or 6) and any visible particulate emissions were observed from any stacks serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the CCHD, APCD by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall notify the CCHD, APCD in writing of any record which shows a deviation of the allowable SO2 emission limitation based upon the calculated sulfur dioxide emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 45 days after the deviation occurs.

3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

   a. Emission Limitation:

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

      Applicable Compliance Method:

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

   b. Emission Limitation:

      0.150 pound of particulate emissions per mmBtu actual heat input

      Applicable Compliance Method:

      Compliance shall be demonstrated based upon emission testing requirements specified in section A.V.2.

   c. Emission Limitation:

      2.5 pounds of SO2 per mmBtu actual heat input

      Applicable Compliance Method:

      Compliance with this emission limitation shall be demonstrated based upon the records required pursuant to section A.III and the emission testing required pursuant to section A.V.2.

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

   a. The emission testing shall be conducted within 45 days after fuel oil is burned in this emissions unit.

   b. The emission testing shall be conducted to demonstrate compliance with the allowable visible particulate emission limitations, the particulate mass emission limitation, and the SO2 mass emission limitation.

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

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

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

   iii. for the SO2 mass emission limitation, Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A.

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

   e. The tests shall be performed with the emissions unit burning the worst-case fuel oil at the time of the test. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CCHD, APCD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the CCHD, APCD's refusal to accept the results of the emission

test(s).

Personnel from the CCHD, APCD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the CCHD, APCD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the CCHD, APCD.

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VI. **Miscellaneous Requirements**

1. The permittee may burn fuel oil in this emissions unit for no more than 2 days during any calendar year for the purpose of establishing operational readiness of the emissions unit without triggering the emission test required in section A.V.2. During this 2-day period, the permittee shall maintain compliance with all of the emission limitations specified in section A.I.1 and all terms and conditions of this permit.

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**Facility ID: 1576000073 Emissions Unit ID: B002 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: B003 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| B&W Sterling Class 131 No. 24 natural gas and fuel oil (No. 6 or better) fired boiler, maximum heat input of 88 mmBtu per hour - Boiler No. 3 | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |
| | OAC rule 3745-17-10(C)(1) | 0.150 pound of particulate emissions per mmBtu actual heat input |
| | OAC rule 3745-18-82(B)(3) | 2.5 pounds of SO2 per mmBtu actual heat input |

2. **Additional Terms and Conditions**

(a) None

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II. **Operational Restrictions**

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

2. The quality of the oil burned in this emissions unit shall have a combination of heat and sulfur content which is sufficient to comply with the allowable SO2 emission limitation.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any stack serving this emissions unit. The presence or absence of any visible emissions 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 emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the

emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content, heat content, and density of the oil, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

   The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, equivalent methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

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

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IV. **Reporting Requirements**

1. The permittee shall submit semiannual written reports that (a) identify all days when this emissions unit was burning fuel oil (No. 4, 5, and/or 6) and any visible particulate emissions were observed from any stacks serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the CCHD, APCD by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall notify the CCHD, APCD in writing of any record which shows a deviation of the allowable SO2 emission limitation based upon the calculated sulfur dioxide emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 45 days after the deviation occurs.

3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

   a. Emission Limitation:

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

      Applicable Compliance Method:

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

   b. Emission Limitation:

      0.150 pound of particulate emissions per mmBtu actual heat input

      Applicable Compliance Method:

      Compliance shall be demonstrated based upon emission testing requirements specified in section A.V.2.

   c. Emission Limitation:

      2.5 pounds of SO2 per mmBtu actual heat input

      Applicable Compliance Method:

      Compliance with this emission limitation shall be demonstrated based upon the records required pursuant to section A.III and the emission testing required pursuant to section A.V.2.

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

   a. The emission testing shall be conducted within 45 days after fuel oil is burned in this emissions unit.

   b. The emission testing shall be conducted to demonstrate compliance with the allowable visible particulate emission limitations, the particulate mass emission limitation, and the SO2 mass emission limitation.

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

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

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

iii. for the SO2 mass emission limitation, Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A.

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

e. The tests shall be performed with the emissions unit burning the worst-case fuel oil at the time of the test. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CCHD, APCD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the CCHD, APCD's refusal to accept the results of the emission test(s).

Personnel from the CCHD, APCD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the CCHD, APCD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the CCHD, APCD.

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VI. **Miscellaneous Requirements**

1. The permittee may burn fuel oil in this emissions unit for no more than 2 days during any calendar year for the purpose of establishing operational readiness of the emissions unit without triggering the emission test required in section A.V.2. During this 2-day period, the permittee shall maintain compliance with all of the emission limitations specified in section A.I.1 and all terms and conditions of this permit.

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**Facility ID: 1576000073 Emissions Unit ID: B003 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P001 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 21.56 mmBtu per hour - Furnace FR01 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-82(B)(4) | See A.II.2 below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

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II. **Operational Restrictions**

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

2. Pursuant to OAC rule 3745-18-82(B)(4):

a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.

b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

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IV. **Reporting Requirements**

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:

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

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

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:

a. The facility-wide forge-shop furnace fuel oil burning rates.

b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P001 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P002 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 21.56 mmBtu per hour - Furnace FR02 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-82(B)(4) | See A.II.2 below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

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II. **Operational Restrictions**

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

2. Pursuant to OAC rule 3745-18-82(B)(4):

a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.

b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

   a. the location and color of the emissions;
   b. whether the emissions are representative of normal operations;
   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
   d. the total duration of any visible emission incident; and
   e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

   The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

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IV. **Reporting Requirements**

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:

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

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

   These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:

   a. The facility-wide forge-shop furnace fuel oil burning rates.

   b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

   The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

   a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P002 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 1576000073 Emissions Unit ID: P003 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 21.88 mmBtu per hour - Furnace FR03 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-82(B)(4) | See A.II.2 below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

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II. **Operational Restrictions**

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

2. Pursuant to OAC rule 3745-18-82(B)(4):

a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.

b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

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IV. **Reporting Requirements**

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:

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

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

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:

a. The facility-wide forge-shop furnace fuel oil burning rates.

b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P003 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P004 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 21.88 mmBtu per hour - Furnace FR04 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-82(B)(4) | See A.II.2 below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

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II. **Operational Restrictions**

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

2. Pursuant to OAC rule 3745-18-82(B)(4):

a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.

b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the

emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

   The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

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IV. **Reporting Requirements**

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:

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

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

   These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:

   a. The facility-wide forge-shop furnace fuel oil burning rates.

   b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

   The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

   a. Emission Limitation:

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

      Applicable Compliance Method:

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

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

   b. Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P004 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P005 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 21.56 mmBtu per hour - Furnace FR05 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-82(B)(4) | See A.II.2 below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

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II. **Operational Restrictions**

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

2. Pursuant to OAC rule 3745-18-82(B)(4):

a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.

b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

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IV. **Reporting Requirements**

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:

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

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

   These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:

   a. The facility-wide forge-shop furnace fuel oil burning rates.

   b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

   The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

   a. Emission Limitation:

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

      Applicable Compliance Method:

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

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

   b. Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P005 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P006 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 21.56 mmBtu per hour - Furnace FR06 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-82(B)(4) | See A.II.2 below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

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II. **Operational Restrictions**

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

2. Pursuant to OAC rule 3745-18-82(B)(4):

a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.

b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

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IV. **Reporting Requirements**

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:

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

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

   These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:

   a. The facility-wide forge-shop furnace fuel oil burning rates.

   b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

   The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

   a. Emission Limitation:

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

      Applicable Compliance Method:

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

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

   b. Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P006 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P007 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum | OAC rule 3745-17-07(B) | See A.I.2.a below. |

heat input 15.84 mmBtu per hour - Furnace
FR07 (no stack)

| | |
|---|---|
| OAC rule 3745-17-08(B) | See A.I.2.b below. |
| OAC rule 3745-18-82(B)(4) | See A.II.2 below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

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II. **Operational Restrictions**

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

2. Pursuant to OAC rule 3745-18-82(B)(4):

a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.

b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

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IV. **Reporting Requirements**

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:

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

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

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:

a. The facility-wide forge-shop furnace fuel oil burning rates.

b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P007 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 1576000073 Emissions Unit ID: P009 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 21.56 mmBtu per hour - Furnace FR10 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-82(B)(4) | See A.II.2 below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

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II. **Operational Restrictions**

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

2. Pursuant to OAC rule 3745-18-82(B)(4):

a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.

b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

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IV. **Reporting Requirements**

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:

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

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

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the

following:

a. The facility-wide forge-shop furnace fuel oil burning rates.

b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P009 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 1576000073 Emissions Unit ID: P010 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 14.62 mmBtu per hour - Furnace FR09 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-82(B)(4) | See A.II.2 below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

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II. **Operational Restrictions**

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

2. Pursuant to OAC rule 3745-18-82(B)(4):

   a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.

   b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

   a. the location and color of the emissions;
   b. whether the emissions are representative of normal operations;
   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
   d. the total duration of any visible emission incident; and
   e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

   The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

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IV. **Reporting Requirements**

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:

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

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

   These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:

   a. The facility-wide forge-shop furnace fuel oil burning rates.

   b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

   The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P016 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| natural gas and fuel oil (No. 6 or better) fired Canton Drop Forge box furnace, with a maximum heat input of 3.88 mmBtu per hour - Furnace FB11 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-82(B)(4) | See A.II.2 below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

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II. **Operational Restrictions**

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

2. Pursuant to OAC rule 3745-18-82(B)(4):

a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.

b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

   a. the location and color of the emissions;
   b. whether the emissions are representative of normal operations;
   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
   d. the total duration of any visible emission incident; and
   e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

   The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

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IV. **Reporting Requirements**

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:

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

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

   These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.
   The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:

   a. The facility-wide forge-shop furnace fuel oil burning rates.

   b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

   The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

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V. **Testing Requirements**

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

   a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P016 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 1576000073 Emissions Unit ID: P017 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| natural gas and fuel oil (No. 6 or better) fired Canton Drop Forge box furnace, with a maximum heat input of 4.39 mmBtu per hour - Furnace FB08 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-82(B)(4) | See A.II.2 below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

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II. **Operational Restrictions**

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

2. Pursuant to OAC rule 3745-18-82(B)(4):

a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.

b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

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IV. **Reporting Requirements**

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:

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

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

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:

a. The facility-wide forge-shop furnace fuel oil burning rates.

b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P017 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 1576000073 Emissions Unit ID: P019 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| natural gas and fuel oil (No. 6 or better) fired Canton Drop Forge box furnace, with a maximum heat input of 3.96 mmBtu per hour - Furnace FB12 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-82(B)(4) | See A.II.2 below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

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II. **Operational Restrictions**

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

2. Pursuant to OAC rule 3745-18-82(B)(4):

a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.

b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the

emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

   The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

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IV. **Reporting Requirements**

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:

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

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

   These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:

   a. The facility-wide forge-shop furnace fuel oil burning rates.

   b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

   The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

   a. Emission Limitation:

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

      Applicable Compliance Method:

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

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

   b. Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P019 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P020 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| natural gas and fuel oil (No. 6 or better) fired Canton Drop Forge box furnace, with a maximum heat input of 3.88 mmBtu per hour - Furnace FB05 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-82(B)(4) | See A.II.2 below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

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II. **Operational Restrictions**

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

2. Pursuant to OAC rule 3745-18-82(B)(4):

a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.

b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

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IV. **Reporting Requirements**

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:

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

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

   These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:

   a. The facility-wide forge-shop furnace fuel oil burning rates.

   b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

   The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

   a. Emission Limitation:

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

      Applicable Compliance Method:

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

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

   b. Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P020 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 1576000073 Emissions Unit ID: P021 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| natural gas and fuel oil (No. 6 or better) fired Canton Drop Forge box furnace, with a maximum heat input of 7.76 mmBtu per hour - Furnace FB21 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-82(B)(4) | See A.II.2 below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

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II. **Operational Restrictions**

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

2. Pursuant to OAC rule 3745-18-82(B)(4):

a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.

b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

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IV. **Reporting Requirements**

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:

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

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

   These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:

   a. The facility-wide forge-shop furnace fuel oil burning rates.

   b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

   The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

   a. Emission Limitation:

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

      Applicable Compliance Method:

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

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

   b. Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P021 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 1576000073 Emissions Unit ID: P024 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| natural gas-fired Hagan pusher type annealing furnace, Model Y6816, with a | OAC rule 3745-17-07(B) | See A.I.2.a below. |

maximum heat input of 18 mmBtu per hour - Furnace OF05 (no stack)

| | |
|---|---|
| OAC rule 3745-17-08(B) | See A.I.2.b below. |
| OAC rule 3745-18-06(E)(1) | See A.I.2.c below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

c. Sulfur dioxide (SO2) emissions shall not exceed 31.8 pounds per hour.

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II. **Operational Restrictions**

1. The permittee shall burn only natural gas in this emissions unit.

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III. **Monitoring and/or Record Keeping Requirements**

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

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

2. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Emission Limitation:

SO2 emissions shall not exceed 31.8 pounds per hour.

Applicable Compliance Method:

The SO2 emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials (steel billets) employed in this emissions unit do not generate SO2 emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

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VI. **Miscellaneous Requirements**

1. None

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**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 1576000073 Emissions Unit ID: P026 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| natural gas-fired Hagan pusher type annealing furnace, Model Y6819, with a maximum heat input of 16 mmBtu per hour - Furnace OF06 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-06(E)(1) | See A.I.2.c below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

c. Sulfur dioxide (SO2) emissions shall not exceed 31.3 pounds per hour.

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II. **Operational Restrictions**

1. The permittee shall burn only natural gas in this emissions unit.

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III. **Monitoring and/or Record Keeping Requirements**

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

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

2. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Emission Limitation:

SO2 emissions shall not exceed 31.3 pounds per hour.

Applicable Compliance Method:

The SO2 emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials (steel billets) employed in this emissions unit do not generate SO2 emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P026 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 1576000073 Emissions Unit ID: P027 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| natural gas-fired Hagan pusher type annealing furnace, Model Y6818, with a maximum heat input of 10 mmBtu per hour - Furnace OF08 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-06(E)(1) | See A.I.2.c below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

c. Sulfur dioxide ($SO_2$) emissions shall not exceed 20.7 pounds per hour.

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II. **Operational Restrictions**

1. The permittee shall burn only natural gas in this emissions unit.

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III. **Monitoring and/or Record Keeping Requirements**

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

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

2. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Emission Limitation:

SO2 emissions shall not exceed 20.7 pounds per hour.

Applicable Compliance Method:

The SO2 emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials (steel billets) employed in this emissions unit do not generate SO2 emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P027 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 1576000073 Emissions Unit ID: P032 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| Pangborn No. 34 mechanical grit blaster with a maximum process weight rate of 2.5 tons per hour controlled by a baghouse (GB1) - Grit Blaster OB06 | OAC rule 3745-17-07(A) | Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule. |
| | OAC rule 3745-17-11(B), Figure II | 19.5 pounds per hour of particulate emissions, as a combined limitation for emissions units P032 and P036<br><br>See A.I.2.a below. |

2. **Additional Terms and Conditions**

a. Emissions units P032 and P036 are similar emissions units; therefore, the total uncontrolled mass rate of emissions (UMRE) from all of the units shall be used to determine the combined allowable emission

limitation from Figure II of OAC rule 3745-17-11. The UMRE was calculated using an emission factor found in a document entitled "An Inventory of Iron Foundry Emissions" by Bernard S. Gutow, dated January, 1972. The document provided an emission factor for shot blasting operations of 15.5 pounds of particulates per ton of metal (uncontrolled). Multiplying this factor by the maximum process weight rate for each emissions unit gives a total UMRE of 232.5 pounds per hour of particulates. Using Figure II, the combined allowable emission rate is determined from curve P1 and the equation: A = 0.5782(U)**0.6456, where "U" is the UMRE.

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II. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water, while the emissions unit is in operation.

   The permittee may petition the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) to reestablish the pressure drop range provided the permittee can demonstrate to the satisfaction of the CCHD, APCD that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 across the baghouse on a daily basis.

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

   The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

2. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

1. Compliance with the emission limitations in sections A.I of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:

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

      Applicable Compliance Method:

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

   b. Emission Limitation:

      19.5 pounds per hour of particulate emissions, as a combined limitation for emissions units P032 and P036

      Applicable Compliance Method:

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

      The tests shall be conducted while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD. The results from the emission tests for emissions units P032 and P036 shall be summed to determine compliance with the combined particulate emission limitation.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P032 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 1576000073 Emissions Unit ID: P033 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| hand grindings of forgings with a maximum process weight rate of 2.38 tons per hour controlled by a baghouse (GRND) - Grinding Area No. 1 | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |
| | OAC rule 3745-17-07(B) | Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average. |
| | OAC rule 3745-17-08(B) | The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).<br><br>See A.I.2.a below. |
| | OAC rule 3745-17-11(B) | 7.33 pounds per hour of particulate emissions<br><br>See A.I.2.b below. |

2. **Additional Terms and Conditions**

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

(a) The collection efficiency of the booth ventilation system shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

b. The permittee shall comply with the more restrictive requirement of either Table 1 or Figure II of OAC rule 3745-17-11. Based on calculations using an emission factor of 1.6 pounds of particulate emissions per ton for grinding operations found in a document entitled "An Inventory of Iron Foundry Emissions" by Bernard S. Gutow, dated January, 1972, Figure II does not apply because the uncontrolled mass rate of emissions (UMRE) was determined to be less than 10 pounds per hour. Therefore, the allowable particulate emission limitation was determined from Table 1, based on the maximum process weight rate of the emissions unit.

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II. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water, while the emissions unit is in operation.

The permittee may petition the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) to reestablish the pressure drop range provided the permittee can demonstrate to the satisfaction of the CCHD, APCD that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

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

windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

   The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall submit semiannual written reports that:

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

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

   These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

   a. Emission Limitation:

      20% opacity as a 6-minute average, for stack emissions

      Applicable Compliance Method:

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

   b. Emission Limitation:

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

      Applicable Compliance Method:

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

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

   c. Emission Limitation:

      7.33 pounds per hour of particulate emissions

      Applicable Compliance Method:

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

procedures specified in OAC Rule 3745-17-03(B)(10).

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD. The following parameters also shall be monitored and recorded during the emissions testing: the pressure drop across the baghouse and the process weight rate, in tons.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P033 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P034 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| hand grindings of forgings with a maximum process weight rate of 2.38 tons per hour controlled by a baghouse (GRND) - Grinding Area No. 2 | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |
| | OAC rule 3745-17-07(B) | Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average. |
| | OAC rule 3745-17-08(B) | The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).<br><br>See A.I.2.a below. |
| | OAC rule 3745-17-11(B) | 7.33 pounds per hour of particulate emissions<br><br>See A.I.2.b below. |

2. **Additional Terms and Conditions**

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

(a) The collection efficiency of the booth ventilation system shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

b. The permittee shall comply with the more restrictive requirement of either Table 1 or Figure II of OAC rule 3745-17-11. Based on calculations using an emission factor of 1.6 pounds of particulate emissions per ton for grinding operations found in a document entitled "An Inventory of Iron Foundry Emissions" by Bernard S. Gutow, dated January, 1972, Figure II does not apply because the uncontrolled mass rate of emissions (UMRE) was determined to be less than 10 pounds per hour. Therefore, the allowable particulate emission limitation was determined from Table 1, based on the maximum process weight rate of the emissions unit.

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II. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water, while the emissions unit is in operation.

The permittee may petition the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) to reestablish the pressure drop range provided the permittee can demonstrate to the satisfaction of the CCHD, APCD that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

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

   a. the location and color of the emissions;
   b. whether the emissions are representative of normal operations;
   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
   d. the total duration of any visible emission incident; and
   e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

   The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall submit semiannual written reports that:

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

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

   These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

   a. Emission Limitation:

      20% opacity as a 6-minute average, for stack emissions

      Applicable Compliance Method:

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

   b. Emission Limitation:

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

      Applicable Compliance Method:

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

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

c. Emission Limitation:

7.33 pounds per hour of particulate emissions

Applicable Compliance Method:

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

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD. The following parameters also shall be monitored and recorded during the emissions testing: the pressure drop across the baghouse and the process weight rate, in tons.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P034 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P035 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| hand grindings of forgings with a maximum process weight rate of 2.38 tons per hour controlled by a baghouse (GRND) - Grinding Area No. 3 | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |
| | OAC rule 3745-17-07(B) | Visible particulate emissions from any fugitive dust source shall not exceed 20% opacity as a 3-minute average. |
| | OAC rule 3745-17-08(B) | The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).<br><br>See A.I.2.a below. |
| | OAC rule 3745-17-11(B) | 7.33 pounds per hour of particulate emissions<br><br>See A.I.2.b below. |

2. **Additional Terms and Conditions**

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

(a) The collection efficiency of the booth ventilation system shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

b. The permittee shall comply with the more restrictive requirement of either Table 1 or Figure II of OAC rule 3745-17-11. Based on calculations using an emission factor of 1.6 pounds of particulate emissions per ton for grinding operations found in a document entitled "An Inventory of Iron Foundry Emissions" by Bernard S. Gutow, dated January, 1972, Figure II does not apply because the uncontrolled mass rate of emissions (UMRE) was determined to be less than 10 pounds per hour. Therefore, the allowable particulate emission limitation was determined from Table 1, based on the maximum process weight rate of the emissions unit.

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II. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water, while the emissions unit is in operation.

The permittee may petition the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) to reestablish the pressure drop range provided the permittee can demonstrate to the satisfaction of the CCHD, APCD that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

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

   a. the location and color of the emissions;
   b. whether the emissions are representative of normal operations;
   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
   d. the total duration of any visible emission incident; and
   e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

   The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall submit semiannual written reports that:

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

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

   These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

   a. Emission Limitation:

      20% opacity as a 6-minute average, for stack emissions

      Applicable Compliance Method:

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

   b. Emission Limitation:

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

      Applicable Compliance Method:

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

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

c. Emission Limitation:

7.33 pounds per hour of particulate emissions

Applicable Compliance Method:

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

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD. The following parameters also shall be monitored and recorded during the emissions testing: the pressure drop across the baghouse and the process weight rate, in tons.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P035 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P036 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| Wheelabrator Super II Tumblast shot cleaner with a maximum process weight rate of 12.5 tons per hour controlled by a baghouse (SB2) - Shot Blaster OB08 | OAC rule 3745-17-07(A) | Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule. |
| | OAC rule 3745-17-11(B), Figure II | 19.5 pounds per hour of particulate emissions, as a combined limitation for emissions units P032 and P036<br><br>See A.I.2.a below. |

2. **Additional Terms and Conditions**

a. Emissions units P032 and P036 are similar emissions units; therefore, the total uncontrolled mass rate of emissions (UMRE) from all of the units shall be used to determine the combined allowable emission limitation from Figure II of OAC rule 3745-17-11. The UMRE was calculated using an emission factor found in a document entitled "An Inventory of Iron Foundry Emissions" by Bernard S. Gutow, dated January, 1972. The document provided an emission factor for shot blasting operations of 15.5 pounds of particulates per ton of metal (uncontrolled). Multiplying this factor by the maximum process weight rate for each emissions unit gives a total UMRE of 232.5 pounds per hour of particulates. Using Figure II, the combined allowable emission rate is determined from curve P1 and the equation: A = 0.5782(U)**0.6456, where "U" is the UMRE.

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II. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water, while the emissions unit is in operation.

The permittee may petition the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) to reestablish the pressure drop range provided the permittee can demonstrate to the satisfaction of the CCHD, APCD that the operating conditions upon which the pressure drop range was previously

established are no longer applicable.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 across the baghouse on a daily basis.

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

   The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

2. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

1. Compliance with the emission limitations in sections A.I of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:

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

      Applicable Compliance Method:

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

   b. Emission Limitation:

      19.5 pounds per hour of particulate emissions, as a combined limitation for emissions units P032 and P036

      Applicable Compliance Method:

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

      The tests shall be conducted while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD. The results from the emission tests for emissions units P032 and P036 shall be summed to determine compliance with the combined particulate emission limitation.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P036 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P039 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| natural gas and fuel oil (No. 6 or better) fired Canton Drop Forge box furnace, with a maximum heat input of 4.57 mmBtu per hour - Furnace FB14 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-82(B)(4) | See A.II.2 below. |
| | OAC rule 3745-31-05(A)(3) (PTI 15-197) | See A.I.2.c and A.II below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

c. Compliance with this rule also includes compliance with OAC rules 3745-17-07(B), 3745-17-08(B), and 3745-18-82(B)(4).

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II. **Operational Restrictions**

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

2. Pursuant to OAC rule 3745-18-82(B)(4):

a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.

b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

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

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

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

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

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IV. **Reporting Requirements**

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:

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

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

   These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall notify the CCHD, APCD in writing of any record which shows a deviation of the allowable sulfur content limitation based upon the sulfur content for each shipment of oil from section A.III above. The notification shall include a copy of such record and shall be sent to the CCHD, APCD within 45 days after the deviation occurs.

3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

4. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:

   a. The facility-wide forge-shop furnace fuel oil burning rates.

   b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

   The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

5. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

   a. Emission Limitation:

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

      Applicable Compliance Method:

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

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

   b. Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P039 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 1576000073 Emissions Unit ID: P040 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| natural gas-fired Hagan pusher type draw furnace, with a maximum heat input of 13 mmBtu per hour - Furnace OF09 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-06(E)(1) | See A.I.2.c below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

c. Sulfur dioxide (SO2) emissions shall not exceed 20.7 pounds per hour.

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II. **Operational Restrictions**

1. The permittee shall burn only natural gas in this emissions unit.

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III. **Monitoring and/or Record Keeping Requirements**

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

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

2. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Emission Limitation:

SO2 emissions shall not exceed 20.7 pounds per hour.

Applicable Compliance Method:

The SO2 emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials (steel billets) employed in this emissions unit do not generate SO2 emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

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VI. **Miscellaneous Requirements**

1. None

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**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P041 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 17-foot, natural gas and fuel oil (No. 6 or better) fired Hagan rotary furnace, maximum heat input 21.56 mmBtu per hour - Furnace FR11 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-82(B)(4) | See A.II.2 below. |
| | OAC rule 3745-31-05(A)(3) (PTI 15-291) | Particulate emissions shall not exceed 0.02 pound per mmBtu actual heat input and 0.438 ton per year.<br><br>Sulfur dioxide (SO2) emissions shall not exceed 0.15 pound per mmBtu actual heat input and 0.05 ton per year. See A.I.2.c and A.I.2.d below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

c. Based on the calculations for establishing the emission limitations in PTI 15-291, the SO2 emission limitation is applicable to natural gas firing only.

d. Compliance with this rule also includes compliance with OAC rules 3745-17-07(B) and 3745-17-08(B).

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II. **Operational Restrictions**

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

2. Pursuant to OAC rule 3745-18-82(B)(4):

a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.

b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by weight.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall maintain annual records of the amount of natural gas (in mmscf) and fuel oil (No. 6 or better) (in gallons) burned in this emissions unit.

5. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

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IV. **Reporting Requirements**

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:

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

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

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:

a. The facility-wide forge-shop furnace fuel oil burning rates.

b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

1. Compliance with the emission limitations in sections A.I of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

points shall include, but not be limited to, doorways, windows, and roof monitors.

b. Emission Limitations:

Particulate emissions shall not exceed 0.02 pound per mmBtu actual heat input and 0.438 ton per year.

Applicable Compliance Method:

The particulate emissions generated by this emissions unit are due solely to the combustion of natural gas and fuel oil (No. 6 or better). The process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the heating process.

b. When firing No. 2 fuel oil, compliance shall be determined by multiplying an emission factor of 2 pounds of particulates/1000 gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (143.7 gallons per hour) and dividing by the emissions unit's rated heat input capacity (21.56 mmBtu per hour). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98).

When firing No. 4 fuel oil, compliance shall be determined by multiplying an emission factor of 7 pounds of particulates/1000 gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (143.7 gallons per hour) and dividing by the emissions unit's rated heat input capacity (21.56 mmBtu per hour). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98).

When firing No. 5 fuel oil, compliance shall be determined by multiplying an emission factor of 10 pounds of particulates/1000 gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (143.7 gallons per hour) and dividing by the emissions unit's rated heat input capacity (21.56 mmBtu per hour). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98).

b. When firing No. 6 fuel oil, compliance shall be determined by multiplying an emission factor of [9.19(S) + 3.22] pounds of particulates/1000 gallons of oil fired, where S = the appropriate fuel oil sulfur content from section A.III.3, by the emissions unit's maximum hourly fuel oil firing capacity (143.7 gallons per hour) and dividing by the emissions unit's rated heat input capacity (21.56 mmBtu per hour). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98).

b. When firing natural gas, compliance shall be determined by multiplying an emission factor of 1.9 pounds of particulates/mm standard cu. ft. by the emissions unit's maximum hourly natural gas firing capacity (.0205 mm standard cu. ft./hr) and dividing by the emissions unit's rated heat input capacity (21.56 mmBtu per hour). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

Compliance with the annual emission limitation shall be demonstrated by summing the total particulate emissions from the burning of natural gas and fuel oil (No. 6 or better). The total particulate emissions from the burning of natural gas and fuel oil (No. 6 or better) shall be determined using the AP-42 emission factors cited above and the fuel usage records required pursuant to section A.III.4.

c. Emission Limitations:

$SO_2$ emissions shall not exceed 0.15 pound per mmBtu actual heat input and 0.05 ton per year.

Applicable Compliance Method:

The $SO_2$ emissions generated by this emissions unit are due solely to the combustion of natural gas and fuel oil (No. 6 or better). The process materials (steel billets) employed in this emissions unit do not generate $SO_2$ emissions during the heating process.

When burning natural gas, compliance with these limitations will be assumed due to the negligible percent sulfur, by weight, in the fuel.

d. Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P045 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| Wheelabrator Super II Tumblast shot cleaner with a maximum process weight rate of 12.5 tons per hour controlled by a baghouse (SB2) - Shot Blaster OB09 | OAC rule 3745-17-07(A) | See A.I.2.a below. |
| | OAC rule 3745-17-11(B) | See A.I.2.a below. |
| | OAC rule 3745-31-05(A)(3) (PTI 15-421) | 1.0 pound per hour of particulate emissions or no visible particulate emissions from the exhaust stack<br><br>4.38 tons per year of particulate emissions |

2. **Additional Terms and Conditions**

   a. The emission limitation(s) specified in this rule is (are) less stringent than the emission limitation(s) established pursuant to the best available technology determination required by OAC rule 3745-31-05 (A)(3).

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II. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water, while the emissions unit is in operation.

   The permittee may petition the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) for reestablishment of the pressure drop range provided the permittee can demonstrate to the satisfaction of the CCHD, APCD that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

2. 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. the total duration of any visible emission incident; and
   c. any corrective actions taken to eliminate the visible emissions.

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

   The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the CCHD, APCD by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

a. Emission Limitation:

1.0 pound per hour of particulate emissions or no visible particulate emissions from the exhaust stack

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the pound per hour particulate emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5; otherwise, compliance shall be demonstrated by the absence of any visible emissions from the baghouse serving this emissions unit in accordance with 40 CFR Part 60, Appendix A, Method 22.

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD. The following parameters shall also be monitored and recorded during the emission testing: the pressure drop across the baghouse and the process weight rate, in tons.

b. Emission Limitation:

4.38 tons per year of particulate emissions

Applicable Compliance Method:

This emission limitation was established by multiplying the allowable hourly emission limitation by the maximum annual hours of operation (8760 hours per year), and then dividing by 2000 pounds per ton. Therefore, compliance with this emission limitation can be assumed provided that the permittee complies with the hourly emission limitation.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P045 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P046 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| natural gas and fuel oil (No. 6 or better) fired Canton Drop Forge box furnace, with a maximum heat input of 5.33 mmBtu per hour - Furnace FB06 (no stack) | OAC rule 3745-17-07(B) | See A.I.2.a below. |
| | OAC rule 3745-17-08(B) | See A.I.2.b below. |
| | OAC rule 3745-18-82(B)(4) | See A.II.2 below. |

2. **Additional Terms and Conditions**

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

b. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.

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II. **Operational Restrictions**

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

2. Pursuant to OAC rule 3745-18-82(B)(4):

a. The total fuel oil consumption by all forge-shop furnaces shall not exceed 775 gallons/hour, 18,600 gallons/day, and 6,789,000 gallons/year. Forge-shop furnaces include emissions units P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046.

b. The sulfur content for any fuel oil used in the forge-shop furnaces shall not exceed 0.05 percent by

weight.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day when fuel oil (No. 4, 5, and/or 6) is burned in this emissions unit, the permittee shall perform a daily check when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:

   a. the location and color of the emissions;
   b. whether the emissions are representative of normal operations;
   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
   d. the total duration of any visible emission incident; and
   e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the type of oil received, and the permittee's or oil supplier's analyses for sulfur content.

   The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content and density of the oil in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods. Alternative, USEPA-approved methods may be used upon written approval from the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

4. The permittee shall keep records of the total hourly, daily, and annual fuel oil burned in the facility forge-shop furnaces.

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IV. **Reporting Requirements**

1. For days during which fuel oil (No. 4, 5, and/or 6) is burned, the permittee shall submit semiannual written reports that:

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

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

   These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or fuel oil (No. 6 or better) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the following:

   a. The facility-wide forge-shop furnace fuel oil burning rates.

   b. The maximum sulfur content of 0.05% by weight for any fuel oil burned in the facility forge-shop furnaces.

   The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Compliance with the operating restriction in Section A.II.2 shall be demonstrated based on the records required pursuant to Section A.III.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: P046 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 1576000073 Emissions Unit ID: Z002 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| Die washing area for cleaning of dies using manual application of kerosene and hand held steam jet | OAC rule 3745-21-07(G)(2) | 8 pounds per hour and 40 pounds per day of Organic Compounds (OC). |

2. **Additional Terms and Conditions**

(a) None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for this emissions unit:

a. The name and identification number of each solvent employed.

b. The number of gallons of each solvent employed.

c. The organic compound content of each solvent employed, in pounds per gallon.

d. The total number of hours this emissions unit was in operation.

e. The total organic compound emission rate for all solvents, in pounds per day [i.e., the summation of (b) x (c) for each solvent employed].

f. The total organic compound emission rate for all solvents, in pounds per hour, item (e) / (d).

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. An identification of each occurance during which the hourly organic compound emissions from the die washing solvents exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.

b. An identification of day during which the hourly organic compound emissions from the die washing solvents exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

2. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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V. **Testing Requirements**

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

a. Emissions Limitation:

8 pounds per hour and 40 pounds per day of Organic Compounds (OC)

Applicable Compliance Method:

Compliance shall be determined by the record keeping and submission of reports as specified in Sections A.III and A.IV above.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: Z002 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: Z028 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

(a) None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1576000073 Emissions Unit ID: Z028 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None