

Facility ID: 1576000378 Issuance type: Title V Draft Permit

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

- a. None

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b State Only Enforceable Section

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

F001 Material Handling
G001 Gasoline tank
P014 Bell hood anneal furnaces 6
P015 #1 cross cutt saws
P016 #1 Weld station
P020 Caustic rinse tank
P021 #2 CAP Steam superheater
P022 #2 Caustic tank rinse heater
P023 #2 CAP caustic wash tank
T001 No. 2 fuel oil tank 120,000 gal.
Z001 #1HAP strip welder
Z002 #2 HAP strip welder
Z003 #1 CAP resistance welder
Z004 #1 CAP oil wiper
Z005 #1 CAP caustic tank heater
Z006 #2 CAP resistance welder
Z007 BA Strip welder
Z008 No. 1 dryer
Z009 Z Mill
Z010 Temper mill
Z011 44" mill
Z012 Basement oilhouse vent
Z013 #19 weld station
Z014 WWTP building heat
Z015 Space heaters
Z016 4 degreasers
Z017 Solvent cleaning degreasing
Z018 Salt tank
Z019 Waste acid cisterns
Z101 Clean mill oil tank
Z102 Clean hydraulic oil tank
Z103 44" mill oil tank L4
Z104 44" mill oil tank L5
Z105 Dirty mill oil tank
Z106 Dirty hydraulic oil tank
Z107 Tramp oil tank A
Z108 Tramp oil tank B
Z109 Cracker tank
Z110 Tramp oil tank C
Z111 Waste oil tank
Z112 H2SO4 storage tank
Z113 HNO3 storage tank
Z114 HNO3 storage tank
Z115 HF storage tank
Z116 HNO3 storage tank
Z117 Ferrous chloride tank
Z119 Oil skimmer holding tank
Z120 BA caustic wash tank
Z121 BA dryer #2
Z122 BA dryer #2

Z123 BA line cooling line
Z124 Lime silos
Z125 #2 CAP hot air dryer
Z126 #1 CAP Caustic tank
Z127 Refrigerants

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1576000378 Emissions Unit ID: B001 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Erie City boiler #4, 129 MMBtu/hr natural gas or no. 2 oil firing capability	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.
	OAC rule 3745-18-06(D)	Sulfur dioxide emissions (SO2) shall not exceed 1.6 lbs/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/or number two fuel oil in this emissions unit. The fuel oil burned in this emissions unit shall be limited in sulfur concentrations to ensure compliance with the allowable sulfur dioxide emission restriction expressed in Section A.1.1.

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III. Monitoring and/or Record Keeping Requirements

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

$$ER = (1 \times 10^6 / H) \times (D) \times (S) \times (1.974)$$

WHERE: ER = the emission rate in pounds of sulfur dioxide per MMBtu.

H = is the heat value of the liquid fuel in Btu/gallon.

D = the density of the liquid fuel in pounds per gallon.

S = the decimal fraction of sulfur in the liquid fuel.

Also, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of oil during each calendar month.

- The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Canton local air agency.
- For each day during which the permittee burns a fuel other than natural gas and/or number two oil, 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

- The permittee shall notify the Canton local air agency in writing of any monthly record which shows a deviation of the allowable sulfur dioxide emission limitation in section A.I, based upon a volume-weighted average of 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 Canton local air agency within 45 days after the deviation occurs.
- The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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V. Testing Requirements

- Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation -
0.020 lb PM/MMBtu actual heat input.

Applicable Compliance Method -
For natural gas fuel, compliance shall be based upon multiplying the maximum hourly fuel flow rate (MMscf/hr) by the AP-42 emission factor (1.9 lb PM/MMscf) and dividing the product by the maximum heat input (MMBtu/hr).

When firing No. 2 oil, compliance shall be based upon multiplying the maximum hourly No. 2 oil flow (1000 gal/hr) by the AP-42 emission factor for No. 2 oil (2.0 lbs PM/1000gal) and by dividing the product by the maximum hourly heat input of the boiler (129 MMBtu/hr).

If required, this facility shall conduct, or have conducted, an emissions test for this emissions unit in order to demonstrate compliance with the allowable mass emissions rate for particulates. The emissions test shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-17-03. The test shall be conducted under maximum production rates unless otherwise specified or approved by the Canton local air agency.
- Emission Limitation -
20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method -
If required, 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).
- Emission Limitation -
1.6 lbs SO₂/MMBtu actual heat input

Applicable Compliance Method -
Compliance shall be demonstrated by the recordkeeping requirements in section A.III. 1 and 2.
If testing is required to demonstrate compliance with the allowable emission limitation of 1.6 lbs SO₂/MMBtu of actual heat input, the testing shall be conducted using the following method:
40 CFR Part 60, Appendix A Method 6.

When firing natural gas, compliance with this limitation will be assumed due to the negligible concentration of sulfur, by weight, in the fuel.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576000378 Emissions Unit ID: B001 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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Erie City boiler #4, 129 MMBtu/hr natural gas or no. 2 oil firing capability.		
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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: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Wickes boiler #3, 75 MMBtu/hr natural gas or no. 2 fuel oil.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.
	OAC rule 3745-18-06(D)	Sulfur dioxide emissions (SO ₂) shall not exceed 1.6 lbs/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/or number two fuel oil in this emissions unit. The fuel oil burned in this emissions unit shall be limited in sulfur concentrations to ensure compliance with the allowable sulfur dioxide emission restriction expressed in Section A.I.1.

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III. Monitoring and/or Record Keeping Requirements

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

ER = (1X10⁶/H) X (D) X (S) X (1.974)
 WHERE: ER = the emission rate in pounds of sulfur dioxide per MMBtu.
 H = is the heat value of the liquid fuel in Btu/gallon.
 D = the density of the liquid fuel in pounds per gallon.
 S = the decimal fraction of sulfur in the liquid fuel.

Also, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of oil during each calendar month.

2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Canton local air agency.
3. For each day during which the permittee burns a fuel other than natural gas and/or number two oil, 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 notify the Canton local air agency in writing of any monthly record which shows a deviation of the allowable sulfur dioxide emission limitation in section A.I, based upon a volume-weighted average of 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 Canton local air agency within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation -
0.020 lb PM/MMBtu actual heat input.

Applicable Compliance Method -
For natural gas fuel, compliance shall be based upon multiplying the maximum hourly fuel flow rate (MMscf/hr) by the AP-42 emission factor (1.9 lb PM/MMscf) and dividing the product by the maximum heat input (MMBtu/hr).

When firing No. 2 oil, compliance shall be based upon multiplying the maximum hourly No. 2 oil flow (1000 gal/hr) by the AP-42 emission factor for No. 2 oil (2.0 lbs PM/1000gal) and by dividing the product by the maximum hourly heat input of the boiler (75 MMBtu/hr).

If required, this facility shall conduct, or have conducted, an emissions test for this emissions unit in order to demonstrate compliance with the allowable mass emissions rate for particulates. The emissions test shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-17-03. The test shall be conducted under maximum production rates unless otherwise specified or approved by the Canton local air agency.
2. Emission Limitation -
20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method -
If required, 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).
3. Emission Limitation -
1.6 lbs SO₂/MMBtu actual heat input

Applicable Compliance Method -
Compliance shall be demonstrated by the recordkeeping requirements in section A.III. 1 and 2.
If testing is required to demonstrate compliance with the allowable emission limitation of 1.6 lbs SO₂/MMBtu of actual heat input, the testing shall be conducted using the following method:
40 CFR Part 60, Appendix A Method 6.

When firing natural gas, compliance with this limitation will be assumed due to the negligible concentration of sulfur, by weight, in the fuel.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Wickes boiler #3, 75 MMBtu/hr natural gas or no. 2 fuel oil.		

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: 1576000378 Emissions Unit ID: F002 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>

<p>Roadways and Parking Areas, approximately 6.6 miles of paved and unpaved roadways and 565,195 sq. ft. of paved and unpaved parking areas used by vehicles with 4 to 18 wheels.</p>	<p>OAC rule 3745-17-07(B)(4)</p>	<p>There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period.</p>
	<p>OAC rule 3745-17-08(B)(8)</p>	<p>reasonably available control measures (see Sections A.1.2.c., A.1.2.d., A.1.2.e., and A.1.2.i.)</p>
	<p>OAC rule 3745-17-07(B)(5)</p>	<p>There shall be no visible particulate emissions from any unpaved road or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.</p>
	<p>OAC rule 3745-17-08(B)(2)</p>	<p>reasonably available control measures (see Sections A.1.2.f. through A.1.2.i.)</p>

2. Additional Terms and Conditions

- a. The paved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

(a)

Paved roadways:
Asphalt 1.2 miles

Paved parking areas:
Permittee's identification Approx. area (sq. ft.)
A. Asphalt 155,509
B. Asphalt 57,150
C. Asphalt 70,425

- b. The unpaved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

Unpaved roadways:
Permittee's identification
Gravel .3 miles
Dirt 5.1 miles

Unpaved parking areas:
Permittee's identification Approx. area (sq. ft.)
F. Gravel 27,000
G. Gravel 13,200

- c. All paved roadways and parking areas shall be flushed with water to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitation.
- d. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- e. The unpaved shoulders of all paved roadways shall be treated with water and/or any other suitable dust suppression chemicals to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitation.
- f. All unpaved roadways and parking areas shall be treated with water and/or any other suitable dust suppression chemicals to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitation.
- g. The control measures shall be implemented at frequencies that will minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and ensure compliance with the above-mentioned visible emission limitations, and the needed frequencies of implementation shall be determined by the permittee's inspections. It is further understood that on any specific day implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitations.
- h. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be considered as a paved roadway or parking area, and controlled with the control measure specified above for paved surfaces. Such unpaved roadway or parking area shall remain subject to the visible emission limitation for unpaved roadways and parking areas.
- i. pen-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary to minimize or eliminate visible emissions of fugitive dust.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:
 - a. paved roadways minimum inspection frequency
The 1.2 miles of paved roadways Weekly
 - b. Paved parking areas minimum inspection frequency
 - A. Asphalt Monthly
 - B. Asphalt Monthly
 - C. Asphalt Monthly
 - c. Unpaved roadways minimum inspection frequency
 - Gravel Daily
 - Dirt Daily
 - d. Unpaved parking areas minimum inspection frequency
 - F. Gravel Daily
 - G. Gravel Daily
 - e. The purpose of the inspections is to determine the need for implementing the control measures specified in section A.1.2. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitations. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
 - f. The permittee may, upon receipt of written approval from the Canton local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitations.
2. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.
3. The information required in 2. d., above, shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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IV. Reporting Requirements

- a. The permittee shall submit deviation (excursion) reports that identify each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

- b. The permittee shall submit deviation (excursion) reports that identify each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
 - c. All deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.
2. If there are no deviations during a calendar quarter that must be reported pursuant to section A.IV. of this permit, the permittee shall submit a quarterly report, in accordance with paragraph B.8 of the General Terms and Conditions, which states that no deviations occurred during that quarter.

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V. Testing Requirements

1. Compliance with the emissions limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitation:

There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period.

Applicable Compliance Method:

Compliance shall be demonstrated using USEPA Method 22 of 40 CFR Part 60, Appendix A, and the modifications listed in paragraph (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03. The visible emission limitation applies to each separate road segment and/or parking area identified in section A.I.2.
 - b. Emissions Limitation:

There shall be no visible particulate emissions from any unpaved road or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.

Applicable Compliance:

Compliance shall be demonstrated using USEPA Method 22 of 40 CFR Part 60, Appendix A. The visible emission limitation applies to each separate road segment and/or parking area identified in section A.I.2.
 - b. Emission Limitation:

There shall be no visible particulate emissions from any unpaved road or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.

Applicable Compliance Method:

Compliance shall be demonstrated using USEPA Method 22 of 40 CFR Part 60, Appendix A.. The visible emission limitation applies to each separate road segment and/or parking area identified in section A.I.2.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1576000378 Emissions Unit ID: F002 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Roadways and Parking Areas, approximately 16 miles of paved and unpaved roadways and 19 acres of paved and unpaved parking areas used by vehicles with 4 to 18 wheels.		

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: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#1 Cold Anneal Line pickling tanks #1,#2,#3 w/ scrubber.	OAC rule 3745-17-11	Emissions of particulate matter (including acid fume) shall not exceed 1.53 lbs/hr.

OAC rule 3745-17-07(A)(1)

Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

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 perform weekly 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:
- the color of the emissions;
 - whether the emissions are representative of normal operations based on the operator's experience or conditions during the most recent stack test;
 - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - the total duration of any visible emission incident; and
 - any corrective actions taken to eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which:
- identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and
 - describe any corrective actions taken to eliminate the 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.

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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:
- Emission Limitation:
Opacity shall not exceed 20%
Applicable Compliance Method:
Compliance shall be demonstrated using USEPA Method 9 pursuant to OAC rule 3745-17-03 (B)(1).
 - Emission Limitation
1.53 lbs/hr of particulate (including acid fumes) emissions.
Applicable Compliance Method
40 CFR Part 60, Appendix A, Methods 1 - 5 and procedures specified in OAC 3745 -17-03(B)(1)

2. Emission Testing Requirements -
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 of issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass particulate emission rate limitations expressed in Section A.I.1.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for particulates, 40 CFR Part 60, Appendix A, Methods 1 - 5 and the procedures specified in OAC 3745 - 17 - 03(B)(1).
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Canton local air agency.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. 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 Canton local air agency's refusal to accept the results of the emission test(s).
 - f. Personnel from the Canton local air agency 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.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency 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 appropriate Canton local air agency.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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#1 Cold Anneal Line pickling tanks #1, #2, #3 w/scrubber.		
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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: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#1 Hot Anneal & Pickle Line pickling tanks #1, #2, #3 w/ scrubber.	OAC rule 3745-17-11	Emissions of particulate matter (including acid fume) shall not exceed 4.70 lbs/hr.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

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 perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations based on the operator's experience or conditions during the most recent stack test;
 - 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 eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which:
 - 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 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.

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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:

Opacity shall not exceed 20%

Applicable Compliance Method:

Compliance shall be demonstrated using USEPA Method 9 pursuant to OAC rule 3745-17-03 (B)(1).
 - b. Emission Limitation

4.70 lbs/hr of particulate (including acid fumes) emissions.

Applicable Compliance Method

40 CFR Part 60, Appendix A, Methods 1 - 5 and procedures specified in OAC 3745 -17-03(B)(1)
2. Emission Testing Requirements -

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 of issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass particulate emission rate limitations expressed in Section A.I.1.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for particulates, 40 CFR Part 60, Appendix A, Methods 1 - 5 and the procedures specified in OAC 3745 - 17 - 03(B)(1).
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity,

unless otherwise specified or approved by the Canton local air agency.

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. 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 Canton local air agency's refusal to accept the results of the emission test(s)
- f. Personnel from the Canton local air agency 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.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency 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 appropriate Canton local air agency.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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#1 Hot Anneal & Pickle Line pickling tanks #1,#2,#3 w/ scrubber.		
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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: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Hot Anneal & Pickle Line, Pickling Tanks #1,#2,#3 (shares common wet scrubber with #1 Hot Anneal & Pickle Line.)	OAC rule 3745-17-11	Emissions of particulate matter (including acid fume) shall not exceed 4.70 lbs/hr.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

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 perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;

- b. whether the emissions are representative of normal operations based on the operator's experience or conditions during the most recent stack test;
- 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 eliminate the visible emissions.

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IV. Reporting Requirements

- 1. The permittee shall submit semiannual written reports which:
 - 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 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.

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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:
 - Opacity shall not exceed 20%
 - Applicable Compliance Method:
 - Compliance shall be demonstrated using USEPA Method 9 pursuant to OAC rule 3745-17-03 (B)(1).
 - b. Emission Limitation
 - 4.70 lbs/hr of particulate (including acid fumes) emissions.
 - Applicable Compliance Method
 - 40 CFR Part 60, Appendix A, Methods 1 - 5 and procedures specified in OAC 3745 -17-03(B)(1)
- 2. Emission Testing Requirements -
 - 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 of issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass particulate emission rate limitations expressed in Section A.I.1.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for particulates, 40 CFR Part 60, Appendix A, Methods 1 - 5 and the procedures specified in OAC 3745 - 17 - 03(B)(1).
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Canton local air agency.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. 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 Canton local air agency's refusal to accept the results of the emission test(s)
 - f. Personnel from the Canton local air agency 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.

- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency 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 appropriate Canton local air agency.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Hot Anneal & Pickle Line, Pickling Tanks #1,#2,#3 (shares common wet scrubber with #1 Hot Anneal & Pickle Line.)		

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: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#1 Cold Anneal & Pickling line preheat furnace, 36 MMBtu/hr heat input, natural gas fired.	OAC Rule 3745-17-11	No applicable limit See A.I.2.a.
	OAC Rule 3745-17-07	See A.I.2.b.

2. **Additional Terms and Conditions**

- a. The steel in #1 Cold Anneal & Pickle preheat furnace (P006) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- b. Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07 (A)(3)(h).

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II. **Operational Restrictions**

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

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

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

1. For each day 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 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 deviation (excursion) reports shall be submitted to the Canton City Health Department, 420 Market Avenue North, Canton, Ohio 44702-1544.

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#1 Cold Anneal & Pickling line preheat furnace, 36 MMBtu/hr heat input, natural gas fired.		

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: 1576000378 Emissions Unit ID: P008 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#1 Cold Anneal & Pickle Equalizer Anneal Furnace, 21.2 MMBtu/hr heat input, natural gas fired.	OAC Rule 3745-17-11	No applicable limit See A.1.2.a.
	OAC Rule 3745-17-07	See A.I.2.b.

2. Additional Terms and Conditions

- a. The steel in #1 Cold Anneal & Pickling Equalizer anneal furnace (P008) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- b. Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07 (A)(3)(h).

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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 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 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 deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1576000378 Emissions Unit ID: P008 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#1 Cold Anneal & Pickle Equalizer Anneal Furnace, 21.2 MMBtu/hr heat input, natural gas fired.		

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: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Hot Anneal & Pickle Line, 8 head shot blaster and baghouse (Wheelabrator)	OAC rule 3745-17-11	20.1 lbs/hr of particulates (baghouse stack)
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained with the range of 1.0 to 7.0 inches of water while the emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, 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 operations 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 deviation reports in accordance with Part I - General Terms and Conditions, Section A.I.c.
2. The permittee shall submit pressure drop 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 in Section A.II.1.
3. All deviation (excursion) reports shall be submitted to the Canton City Health Department, 420 Market Avenue North, Canton, Ohio 44702-1544.

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V. Testing Requirements

1. Compliance with the emissions in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
 - 20.1 lbs/hr particulate emissions.
 - Applicable Compliance Method:
 - Methods 1 through 5 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:
- 20 percent opacity, as a 6-minute average, except as provided by 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).
2. The permittee shall conduct, or have conducted, baghouse stack emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months following issuance of this permit and include uncontrolled particulate tests at the baghouse inlet.
- b. The emission testing shall be conducted to determine the uncontrolled mass rate of emission from the shot blaster for the purpose of applying curve P-1 of Figure II in OAC Rule 3745-17-11.
- c. Pressure drop readings shall be recorded during the emissions test to establish an acceptable range of operation.
- d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate, 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03 (B)(10). Opacity limits will be proven by use of EPA Method 9 and OAC rule 3745 -17-03 (B) (1). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. The test shall be conducted while pickling the most difficult material.
- Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
3. Personnel from the Canton local air agency 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 emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency 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 Canton local air agency.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Hot Anneal & Pickle Line, 8 head shot blaster and baghouse (Wheelabrator)		
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: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Hot Anneal & Pickle Equalizer anneal furnace, 39 MMBtu/hr heat input, natural gas fired.	OAC Rule 3745-17-11	No applicable limit See A.1.2.a.
	OAC Rule 3745-17-07	See A.I.2.b.

2. Additional Terms and Conditions

- a. The steel in #2 Hot Anneal & Pickling Equalizer anneal furnace (P010) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- b. Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07 (A)(3)(h).

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II. Operational Restrictions

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

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

III. Monitoring and/or Record Keeping Requirements

- 1. For each day 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 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 deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1576000378 Emissions Unit ID: P010 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Hot Anneal & Pickle Equalizer anneal furnace, 39 MMBtu/hr heat input, natural gas fired.		

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: 1576000378 Emissions Unit ID: P011 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Hot Anneal & Pickling preheat anneal furnace, 20 MMBtu/hr heat input, natural gas fired.	OAC Rule 3745-17-11	No applicable limit See A.I.2.a.
	OAC Rule 3745-17-07	See A.I.2.b.

2. **Additional Terms and Conditions**

- a. The steel in #2 Hot Anneal & Pickling preheat anneal furnace (P011) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- b. Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07 (A)(3)(h).

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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 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 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 deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1576000378 Issuance type: Title V Draft Permit

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Facility ID: 1576000378 Emissions Unit ID: P011 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Hot Anneal & Pickling preheat anneal furnace, 20 MMBtu/hr heat input, natural gas fired.		

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

VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1576000378 Issuance type: Title V Draft Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 1576000378 Emissions Unit ID: P012 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#1 Hot Anneal & Pickle Equalizer Anneal furnace, 21.2 MMBtu/hr heat input, natural gas fired.	OAC Rule 3745-17-11	No applicable limit See A.I.2.a.
	OAC Rule 3745-17-07	See A.I.2.b.

2. Additional Terms and Conditions

- a. The steel in #1 Hot Anneal & Pickling Equalizer furnace (P012) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- b. Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07 (A)(3)(h).

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II. Operational Restrictions

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

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

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

1. For each day 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 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 deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576000378 Emissions Unit ID: P012 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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#1 Hot Anneal & Pickle Equalizer Anneal furnace, 21.2 MMBtu/hr heat input, natural gas fired.		
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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: 1576000378 Emissions Unit ID: P013 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#1 Hot Anneal & Pickle preheat furnace, 40 MMBtu/hr heat input, natural gas fired.	OAC Rule 3745-17-11	No applicable limit See A.1.2.a.
	OAC Rule 3745-17-07	See A.1.2.b.

2. Additional Terms and Conditions

- a. The steel in #1 Hot Anneal & Pickling preheat furnace (P013) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- b. Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07 (A)(3)(h).

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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 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 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 deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576000378 Emissions Unit ID: P013 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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#1 Hot Anneal & Pickle preheat furnace, 40 MMBtu/hr heat input, natural gas fired.		
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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: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Cold Anneal & Pickle #1 anneal furnace, 25.68 MMBtu/hr heat input, natural gas fired.	OAC Rule 3745-17-11 OAC Rule 3745-17-07	No applicable limit See A.I.2.a. See A.I.2.b.

2. **Additional Terms and Conditions**

- a. The steel in #2 Cold Anneal & Pickle #1 Anneal furnace (P017) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- b. Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07 (A)(3)(h).

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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 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 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 deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Cold Anneal & Pickle #1 anneal furnace, 25.68 MMBtu/hr heat input, natural gas fired.		

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: 1576000378 Emissions Unit ID: P018 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Cold Anneal & Pickle #2 anneal furnace, 28.4 MMBtu/hr heat input, natural gas fired.	OAC Rule 3745-17-11	No applicable limit See A.1.2.a.
	OAC Rule 3745-17-07	See A.1.2.b.

2. **Additional Terms and Conditions**

- a. The steel in #2 Cold Anneal furnace (P018) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- b. Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07 (A)(3)(h).

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

II. **Operational Restrictions**

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

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

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

1. For each day 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 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 deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

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V. **Testing Requirements**

1. None

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

VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576000378 Emissions Unit ID: P018 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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#2 Cold Anneal & Pickle #2 anneal furnace, 28.4 MMBtu/hr heat input, natural gas fired.		
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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: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Cold Anneal & Pickle Baths #1, #2, #3; w/ wet scrubber.	OAC rule 3745-17-11	Emissions of particulate matter (including acid fume) shall not exceed 1.53 lbs/hr.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

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 perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations based on the operator's experience or conditions during the most recent stack test;
 - 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 eliminate the visible emissions.

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IV. Reporting Requirements

- 1. The permittee shall submit semiannual written reports which:
 - 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 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.

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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:

Opacity shall not exceed 20%

Applicable Compliance Method:

Compliance shall be demonstrated using USEPA Method 9 pursuant to OAC rule 3745-17-03 (B)(1).
 - b. Emission Limitation

1.53 lbs/hr of particulate (including acid fumes) emissions.

Applicable Compliance Method

40 CFR Part 60, Appendix A, Methods 1 - 5 and procedures specified in OAC 3745 -17-03(B)(1)
2. Emission Testing Requirements -

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 of issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass particulate emission rate limitations expressed in Section A.I.1. Alternative U. S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for particulates, 40 CFR Part 60, Appendix A, Methods 1 - 5 and the procedures specified in OAC 3745 - 17 - 03(B)(1).
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Canton local air agency.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. 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 Canton local air agency's refusal to accept the results of the emission test(s)
 - f. Personnel from the Canton local air agency 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.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency 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 appropriate Canton local air agency.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Cold Anneal & Pickle Baths #1, #2, #3; w/ wet scrubber.		

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: 1576000378 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Cold Anneal & Pickle Equalizer Anneal Furnace, 12.22 MMBtu/hr heat input, natural gas fired.	OAC Rule 3745-17-11	No applicable limit See A.I.2.a.
	OAC Rule 3745-17-07	See A.I.2.b.

2. Additional Terms and Conditions

- a. The steel treated in the preheat furnace (P024) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- b. Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07 (A)(3)(h).

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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 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 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 deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1576000378 Emissions Unit ID: P024 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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#2 Cold Anneal & Pickle Equalizer Anneal Furnace, 12.22 MMBtu/hr heat input, natural gas fired.

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: 1576000378 Emissions Unit ID: P025 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#1 Hot Anneal & Pickle Line, 4 head shot blaster and primary baghouse (Pangborn Model 240 HP-1015-TS-825)	OAC rule 3745-17-11	4.09 lbs/hr of particulates (baghouse stack)
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

2. **Additional Terms and Conditions**

- a. More restrictive particulate limit exists in B.I.1., State Enforceable Section, 1.71 lbs/hr particulate matter.

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II. **Operational Restrictions**

- 1. The pressure drop across the baghouse shall be maintained with the range of 1.0 to 7.0 inches of water while the emissions unit is in operation.

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

- 1. The permittee shall properly install, 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 operations 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 deviation reports in accordance with Part I - General Terms and Conditions, Section A.I.c.
- 2. The permittee shall submit pressure drop 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 in Section A.II.1.
- 3. All deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

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V. **Testing Requirements**

- 1. Compliance with the emissions in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
 - 4.09 lbs/hr particulate emissions.
 - Applicable Compliance Method:
 - Methods 1 through 5 of 40 CFR Part 60, Appendix A.
 - b. Emission Limitation:
 - 20 percent opacity, as a 6-minute average, except as provided by 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).
- 2. The permittee shall conduct, or have conducted, baghouse stack emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 6 months following issuance of this permit and include uncontrolled particulate tests at the baghouse inlet.
 - b. The emission testing shall be conducted to determine the uncontrolled mass rate of emission from the shot blaster for the purpose of applying curve P-1 of Figure II in OAC Rule 3745-17-11.
 - c. Pressure drop readings shall be recorded during the emissions test to establish an acceptable range of operation.
 - d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate, 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03 (B)(10). Opacity limits will be proven by use of EPA Method 9 and OAC rule 3745 -17-03 (B) (1). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. The test shall be conducted while pickling the most difficult material.

 Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
3. Personnel from the appropriate Ohio EPA District Office or Canton City Health Department 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 emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576000378 Emissions Unit ID: P025 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#1 Hot Anneal & Pickle Line, 4 head shot blaster and primary baghouse (Pangborn Model 240 HP-1015-TS-825)	OAC rule 3745-31-05 PTI #15-506	1.71 lbs/hr particulates

2. **Additional Terms and Conditions**

- a. The baghouse removal efficiency shall not be less than 99% per PTI #15-506.

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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. Compliance with the emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
1.71 lbs/hr of particulate matter, 99% collection efficiency.

Applicable Compliance Method:

See Part A.V.1.a., Testing Requirements.

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VI. Miscellaneous Requirements

1. None