

Facility ID: 1576000695 Issuance type: Final State Permit To Operate

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

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

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

- [Go to Part II for Emissions Unit B005](#)
- [Go to Part II for Emissions Unit B006](#)
- [Go to Part II for Emissions Unit P003](#)
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- [Go to Part II for Emissions Unit P015](#)
- [Go to Part II for Emissions Unit P016](#)
- [Go to Part II for Emissions Unit P017](#)
- [Go to Part II for Emissions Unit P018](#)
- [Go to Part II for Emissions Unit P019](#)
- [Go to Part II for Emissions Unit P023](#)
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Facility ID: 1576000695 Emissions Unit ID: B005 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
4.2 MMBtu/hr, natural gas fired boiler, package boiler #1 (with stack)	OAC Rule 3745-17-10, including but not limited to 3745-17-10(B)(1) [6-14-91] OAC Rule 3745-17-07, including but not limited to 3745-17-07(A) [6-14-91]	Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input Visible Emission Limits (See Additional Terms & Conditions 2.b.)

2. Additional Terms and Conditions

- (a) The total NOx emissions from this facility shall not exceed 95 tons/yr. This emission limit shall be achieved by limiting the amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B005, B006, P003, P009, P015, P016, P017, P018, P019, P023, P024 and all exempted natural gas burning equipment.
Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

B. Operational Restrictions

1. Natural gas shall be the only fuel burned in this emissions unit.
2. The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling twelve-month summation, with each month establishing a separate twelve-month period.
3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) Allowable Total Cumulative Natural

(After Permit Issuance) Gas Consumption (MMCF)

1 146
 1-2 286
 1-3 424
 1-4 532
 1-5 630
 1-6 724
 1-7 815
 1-8 900
 1-9 988
 1-10 1080
 1-11 1198
 1-12 1318

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

- The permittee shall maintain records of the following information:
 The total natural gas usage for all emissions units at the facility. Natural gas usage for individual emissions units does not have to be recorded.
 Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
 During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

- The permittee shall submit exceedance reports, within 30 days following the end of each month during which an exceedance occurred, that identify the following:
 All exceedances of the maximum allowable cumulative natural gas usage during the first 12 calendar months of operation following the issuance of this permit.
 After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,318 MMCF.
- The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emissions and the total amount of natural gas used at this facility during the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart I.3)

E. Testing Requirements

- Compliance with the emission limitation(s) in Section A of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation:
 Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.

Applicable Compliance Method:
 The AP-42 emissions factor for filterable particulate emissions, 6.2 lbs/MMCF, shall be used to show compliance with the allowable particulate emission rate.

Emission Limitation:
 The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:
 The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:
 Opacity shall not exceed 20%, except for one 6-minute period in any hour when up to 60% is permissible.

Applicable Compliance Method:
 OAC Rule 3745-17-03 (B)(1), EPA Method nine (9).

F. Miscellaneous Requirements

- By request of the applicant and pursuant to OAC 3745-35-07, the following listed Special Terms & Conditions are federally enforceable and incorporate limits on the potential to emit NOx for this emissions unit (B005) in combination with B006, P003, P009, P015, P016, P017, P018, P019, P023, P024 and other equipment exempt from permitting: A through F.

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Facility ID: 1576000695 Emissions Unit ID: B006 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
4.2 MMBtu/hr, natural gas fired boiler, package boiler #2 (with stack)	OAC Rule 3745-17-10, including but not limited to 3745-17-10(B)(1) [6-14-91] OAC Rule 3745-17-07, including but not limited to 3745-17-07(A) [6-14-91]	Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input Visible Emission Limits (See Additional Terms & Conditions 2.b.)

2. Additional Terms and Conditions

- (a) The total NOx emissions from this facility shall not exceed 95 tons/yr. This emission limit shall be achieved by limiting the amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B005, B006, P003, P009, P015, P016, P017, P018, P019, P023, P024 and all exempted natural gas burning equipment.

Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

B. Operational Restrictions

1. Natural gas shall be the only fuel burned in this emissions unit.
2. The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling twelve-month summation, with each month establishing a separate twelve-month period.
3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) Allowable Total Cumulative Natural Gas Consumption (MMCF)

- 1 146
- 1-2 286
- 1-3 424
- 1-4 532
- 1-5 630
- 1-6 724
- 1-7 815
- 1-8 900
- 1-9 988
- 1-10 1080
- 1-11 1198
- 1-12 1318

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
The total natural gas usage for all emissions units at the facility.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit exceedance reports, within 30 days following the end of each month during which an exceedance occurred, that identify the following:
All exceedances of the maximum allowable cumulative natural gas usage during the first 12 calendar months of operation following the issuance of this permit.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,318 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emissions and the total amount of natural gas used at this facility during the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart I.3)

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation:
Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.

Applicable Compliance Method:
The AP-42 emissions factor for filterable particulate emissions, 6.2 lbs/MMCF, shall be used to show compliance with the allowable particulate emission rate.

Emission Limitation:
The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:
The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:
Opacity shall not exceed 20%, except for one 6-minute period in any hour when up to 60% is permissible.

Applicable Compliance Method:
OAC Rule 3745-17-03 (B)(1), EPA Method nine (9).

F. Miscellaneous Requirements

1. By request of the applicant and pursuant to OAC 3745-35-07, the following listed Special Terms & Conditions are federally enforceable and incorporate limits on the potential to emit NOx for this emissions unit (B006) in combination with B005, P003, P009, P015, P016, P017, P018, P019, P023, P024 and other equipment exempt from permitting: A through F.

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Facility ID: 1576000695 Emissions Unit ID: P003 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
12.5 MMBtu/hr, natural gas fired heat treating furnace, No. 1 furnace (no stack)	OAC Rule 3745-17-08, including but not limited to 3745-17-08(B) [6-14-91]	This emissions unit must employ RACM for the control of fugitive dust emissions. For this emissions unit RACM consists of no control measures.
	OAC Rule 3745-17-07, including but not limited to 3745-17-07(B)(1) [6-14-91]	Visible Emission Limits (See Additional Terms & Conditions 2.b.)

2. Additional Terms and Conditions

- (a) The total NOx emissions from this facility shall not exceed 95 tons/yr. This emission limit shall be achieved by limiting the amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B005, B006, P003, P009, P015, P016, P017, P018, P019, P023, P024 and the following exempt equipment: Office Boiler No. 1, Office Boiler No. 2, Pickling Tubs, Space Heaters/Water Heaters (Plantwide), Ingot Preheaters (3), Electrode End Heaters (3), Pipe Heaters - No. 1 Melt Shop (3), and Pipe Heater - Press Building.
Visible particulate emissions of fugitive dust shall not exceed twenty percent opacity as a three minute average.

B. Operational Restrictions

1. Natural gas shall be the only fuel burned in this emissions unit.
2. The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling twelve-month summation, with each month establishing a separate twelve-month period.
3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) Allowable Total Cumulative Natural Gas Consumption (MMCF)

- 1 146
- 1-2 286
- 1-3 424
- 1-4 532
- 1-5 630
- 1-6 724
- 1-7 815
- 1-8 900
- 1-9 988
- 1-10 1080
- 1-11 1198
- 1-12 1318

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
The total natural gas usage for all emissions units at the facility. Natural gas usage for individual emissions units does not have to be recorded.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit exceedance reports, within 30 days following the end of each month during which an exceedance occurred, that identify the following:
All exceedances of the maximum allowable cumulative natural gas usage during the first 12 calendar months of operation following the issuance of this permit.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,318 MMCF.

- 2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emissions and the total amount of natural gas used at this facility during the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart 1.3)

E. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation:
The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:
The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:
Visible particulate emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:
OAC Rule 3745-17-03 (B)(1), EPA Method nine (9).

F. Miscellaneous Requirements

- 1. By request of the applicant and pursuant to OAC 3745-35-07, the following listed Special Terms & Conditions are federally enforceable and incorporate limits on the potential to emit NOx for this emissions unit (P003) in combination with B005, B006, P009, P015, P016, P017, P018, P019, P023, P024 and other equipment exempt from permitting: A through F.

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Facility ID: 1576000695 Emissions Unit ID: P009 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
30 MMBtu/hr, natural gas fired reheat furnace, Furnace #7 (no stack)	OAC Rule 3745-17-07, including but not limited to 3745-17-07(A) [6-14-91]	Visible Emission Limits (See Additional Terms & Conditions 2.b.)
	OAC Rule 3745-17-08, including but not limited to 3745-17-08(B) [6-14-91]	This emissions unit shall employ RACM for the control of fugitive dust emissions. RACM for this emissions unit consists of no control measures.

2. Additional Terms and Conditions

- (a) The total NOx emissions from this facility shall not exceed 95 tons/yr. This emission limit shall be achieved by limiting the amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B005, B006, P003, P009, P015, P016, P017, P018, P019, P023, P024 and all exempted natural gas burning equipment.
 Visible particulate emissions of fugitive dust shall not exceed twenty per cent opacity for a three-minute average.

B. Operational Restrictions

1. Natural gas shall be the only fuel burned in this emissions unit.
2. The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling twelve-month summation, with each month establishing a separate twelve-month period.
3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) Allowable Total Cumulative Natural
 (After Permit Issuance) Gas Consumption (MMCF)

1 146
 1-2 286
 1-3 424
 1-4 532
 1-5 630
 1-6 724
 1-7 815
 1-8 900
 1-9 988
 1-10 1080
 1-11 1198
 1-12 1318

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 The total natural gas usage for all emissions units at the facility. Natural gas usage for individual emissions units does not have to be recorded.
 Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
 During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit exceedance reports, within 30 days following the end of each month during which an exceedance occurred, that identify the following:
 All exceedances of the maximum allowable cumulative natural gas usage during the first 12 calendar months of operation following the issuance of this permit.
 After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,318 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emissions and the total amount of natural gas used at this facility during the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart I.3)

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation:
 The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:
 The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:
 Visible particulate emissions of fugitive dust shall not exceed twenty percent opacity as a three minute average

Applicable Compliance Method:
 OAC Rule 3745-17-03 (B)(1), EPA Method nine (9).

F. Miscellaneous Requirements

1. By request of the applicant and pursuant to OAC 3745-35-07, the following listed Special Terms & Conditions are federally enforceable and incorporate limits on the potential to emit NOx for this emissions unit (P009) in combination with B005, B006, P003, P015, P016, P017, P018, P019, P023, P024 and other equipment exempt from permitting: A through F.

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Facility ID: 1576000695 Emissions Unit ID: P015 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
4.2 MMBtu/hr, natural gas fired heat treating furnace, No. 2 furnace (no stack)	OAC Rule 3745-17-07, including but not limited to 3745-17-07(A) [6-14-91]	Visible Emission Limits (See Additional Terms & Conditions 2.b.)
	OAC Rule 3745-17-08, including but not limited to 3745-17-08(B) [6-14-91]	This emissions unit shall employ RACM to control fugitive dust emissions. For this emissions unit RACM consists of no control measures.

2. Additional Terms and Conditions

- (a) The total NOx emissions from this facility shall not exceed 95 tons/yr. This emission limit shall be achieved by limiting the amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B005, B006, P003, P009, P015, P016, P017, P018, P019, P023, P024 and all exempted natural gas burning equipment.

Visible particulate emissions of fugitive dust shall not exceed twenty percent opacity for a three-minute average.

B. Operational Restrictions

1. Natural gas shall be the only fuel burned in this emissions unit.
2. The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling twelve-month summation, with each month establishing a separate twelve-month period.
3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) Allowable Total Cumulative Natural (After Permit Issuance) Gas Consumption (MMCF)

- 1 146
- 1-2 286
- 1-3 424
- 1-4 532
- 1-5 630
- 1-6 724
- 1-7 815
- 1-8 900
- 1-9 988
- 1-10 1080
- 1-11 1198

1-12 1318

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
The total natural gas usage for all emissions units at the facility. Natural gas usage for individual emissions units does not have to be recorded.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit exceedance reports, within 30 days following the end of each month during which an exceedance occurred, that identify the following:
All exceedances of the maximum allowable cumulative natural gas usage during the first 12 calendar months of operation following the issuance of this permit.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,318 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emissions and the total amount of natural gas used at this facility during the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart I.3)

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation:

The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:

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

Applicable Compliance Method:

OAC Rule 3745-17-03 (B)(1), EPA Method nine (9).

F. Miscellaneous Requirements

1. By request of the applicant and pursuant to OAC 3745-35-07, the following listed Special Terms & Conditions are federally enforceable and incorporate limits on the potential to emit NOx for this emissions unit (P015) in combination with B005, B006, P003, P009, P016, P017, P018, P019, P023, P024 and other equipment exempt from permitting: A through F.

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

Facility ID: 1576000695 Emissions Unit ID: P016 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
12.5 MMBtu/hr, natural gas fired heat treating furnace, Furnace No. 3 (no stack)	OAC Rule 3745-17-07, including but not limited to 3745-17-07(B)(1) [6-14-91]	Visible Emission Limits (See Additional Terms & Conditions 2.b.)
	OAC Rule 3745-17-08, including but not limited to 3745-17-08(B) [6-14-91]	This emissions unit shall employ RACM to control fugitive dust emissions. For this emissions unit RACM consists of no control measures.

2. Additional Terms and Conditions

- (a) The total NOx emissions from this facility shall not exceed 95 tons/yr. This emission limit shall be achieved by limiting the amount of natural gas burned at this facility. The burning of natural gas is the major source of NOx emissions at this site.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B005, B006, P003, P009, P015, P016, P017, P018, P019, P023, P024 and all exempted natural gas burning equipment.
Visible particulate emissions of fugitive dust shall not exceed twenty percent opacity for a three-minute average.

B. Operational Restrictions

1. Natural gas shall be the only fuel burned in this emissions unit.
2. The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling twelve-month summation, with each month establishing a separate twelve-month period.
3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) Allowable Total Cumulative Natural Gas Consumption (MMCF)

- 1 146
- 1-2 286
- 1-3 424
- 1-4 532
- 1-5 630
- 1-6 724
- 1-7 815
- 1-8 900
- 1-9 988
- 1-10 1080
- 1-11 1198
- 1-12 1318

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
The total natural gas usage for all emissions units at the facility. Natural gas usage for individual emissions units does not need to be recorded.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit exceedance reports, within 30 days following the end of each month during which an exceedance occurred, that identify the following:
All exceedances of the maximum allowable cumulative natural gas usage during the first 12 calendar months of operation following the issuance of this permit.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,318 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emissions and the total amount of natural gas used at this facility during the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart I.3)

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation:

The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:

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

Applicable Compliance Method:

OAC Rule 3745-17-03 (B)(1), EPA Method nine (9).

F. Miscellaneous Requirements

1. By request of the applicant and pursuant to OAC 3745-35-07, the following listed Special Terms & Conditions are federally enforceable and incorporate limits on the potential to emit NOx for this emissions unit (P016) in combination with B005, B006, P003, P009, P015, P017, P018, P019, P023, P024 and other equipment exempt from permitting: A through F.

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

Facility ID: 1576000695 Emissions Unit ID: P017 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
12.5 MMBtu/hr natural gas fired heat treating furnace; Furnace No. 4 (no stack)	OAC Rule 3745-17-07, including but not limited to 3745-17-07(B)(1) [6-14-91]	Visible Emission Limits (See Additional Terms & Conditions 2.b.)
	OAC Rule 3745-17-08, including but not limited to 3745-17-08(B) [6-14-91]	This emissions unit shall employ RACM to control fugitive dust emissions. RACM for this emissions unit shall consist of no control measures.

2. Additional Terms and Conditions

- (a) The total NOx emissions from this facility shall not exceed 95 tons/yr. This emission limit shall be achieved by limiting the amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B005, B006, P003, P009, P015, P016, P017, P018, P019, P023, P024 and all exempted natural gas burning equipment.

Visible particulate emissions of fugitive dust shall not exceed twenty percent opacity for a three-minute average.

B. Operational Restrictions

1. Natural gas shall be the only fuel burned in this emissions unit.
2. The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling twelve-month summation, with each month establishing a separate twelve-month period.
3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) Allowable Total Cumulative Natural
(After Permit Issuance) Gas Consumption (MMCF)

1 146
1-2 286
1-3 424
1-4 532
1-5 630
1-6 724
1-7 815
1-8 900
1-9 988
1-10 1080
1-11 1198
1-12 1318

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
The total natural gas usage for all emissions units at the facility. Natural gas usage for individual emissions units does not have to be recorded.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit exceedance reports, within 30 days following the end of each month during which an exceedance occurred, that identify the following:
All exceedances of the maximum allowable cumulative natural gas usage during the first 12 calendar months of operation following the issuance of this permit.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,318 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emissions and the total amount of natural gas used at this facility during the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart I.3)

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation:
Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.

Applicable Compliance Method:
The AP-42 Emission Limitation:
The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:
The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:
Visible particulate emissions of fugitive dust shall not exceed twenty percent opacity as a three minute average.

Applicable Compliance Method:
OAC Rule 3745-17-03 (B)(1), EPA Method nine (9).

F. Miscellaneous Requirements

1. By request of the applicant and pursuant to OAC 3745-35-07, the following listed Special Terms & Conditions are federally enforceable and incorporate limits on the potential to emit NOx for this emissions unit (P017) in combination with B005, B006, P003, P009, P015, P016, P018, P019, P023, P024 and other equipment exempt from permitting: A through F.

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

Facility ID: 1576000695 Emissions Unit ID: P018 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
20 MMBtu/hr natural gas fired heat treating furnace; Furnace No. 5 (no stack)	OAC Rule 3745-17-07, including but not limited to 3745-17-07(A) [6-14-91]	Visible Emission Limits (See Additional Terms & Conditions 2.b.)
	OAC Rule 3745-17-08, including but not limited to 3745-17-08(B)(1) [6-14-91]	This emissions unit shall employ RACM to control fugitive dust emissions. For this emissions unit RACM consists of no control measures.
	OAC Rule 3745-31-05 (PTI 15-377)	0.4 lb PM/hr

2. Additional Terms and Conditions

- (a) The total NOx emissions from this facility shall not exceed 95 tons/yr. This emission limit shall be achieved by limiting the amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B005, B006, P003, P009, P015, P016, P017, P018, P019, P023, P024 and all exempted natural gas burning equipment.

Visible particulate emissions of fugitive dust shall not exceed twenty percent opacity for a three minute average.

B. Operational Restrictions

1. Natural gas shall be the only fuel burned in this emissions unit.
2. The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling twelve-month summation, with each month establishing a separate twelve-month period.
3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) Allowable Total Cumulative Natural (After Permit Issuance) Gas Consumption (MMCF)

- 1 146
- 1-2 286
- 1-3 424
- 1-4 532
- 1-5 630

1-6 724

1-7 815
 1-8 900
 1-9 988
 1-10 1080
 1-11 1198
 1-12 1318

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

- The permittee shall maintain records of the following information:
 The total natural gas usage for all emissions units at the facility. Natural gas usage for individual emissions units does not have to be recorded.
 Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
 During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

- The permittee shall submit exceedance reports within 30 days following the end of each month during which an exceedance occurred that identify the following:
 All exceedances of the maximum allowable cumulative natural gas usage during the first 12 calendar months of operation following the issuance of this permit.
 After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,318 MMCF.
- The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emissions and the total amount of natural gas used at this facility during the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart I.3)

E. Testing Requirements

- Compliance with the emission limitation(s) in Section A of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation:

The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed twenty percent for a three-minute average.

Applicable Compliance Method:

OAC Rule 3745-17-03 (B)(1), EPA Method nine (9).

Emission Limitation:

0.4 lb PM/hr

Applicable Compliance Method:

AP-42 Supplement F has an emission factor of 6.2 lbs PM/MM CF which shall be used to show compliance

F. Miscellaneous Requirements

- By request of the applicant and pursuant to OAC 3745-35-07, the following listed Special Terms & Conditions are federally enforceable and incorporate limits on the potential to emit NOx for this emissions unit (P018) in combination with B005, B006, P003, P009, P015, P016, P017, P019, P023, P024 and other equipment exempt from permitting: A through F.

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

Facility ID: 1576000695 Emissions Unit ID: P019 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
20 MMBtu/hr natural gas fired heat treating furnace; Furnace No. 6 (no stack)	OAC Rule 3745-17-07, including but not limited to 3745-17-07(A) [6-14-91]	Visible Emission Limits (See Additional Terms & Conditions 2.b.)
	OAC Rule 3745-17-08, including but not limited to 3745-17-08(B)(1) [6-14-91]	This emissions unit shall employ RACM to control fugitive dust emissions. RACM for this emissions unit shall consist of no control measures.
		0.4 lb PM/hr
	OAC Rule 3745-31-05 (PTI 15-377)	

2. Additional Terms and Conditions

- (a) The total NOx emissions from this facility shall not exceed 95 tons/yr. This emission limit shall be achieved by limiting the amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B005, B006, P003, P009, P015, P016, P017, P018, P019, P023, P024 and all exempted natural gas burning equipment.

Visible particulate emissions of fugitive dust shall not exceed twenty percent opacity for a three-minute average.

B. Operational Restrictions

1. Natural gas shall be the only fuel burned in this emissions unit.
2. The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling twelve-month summation, with each month establishing a separate twelve-month period.
3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) Allowable Total Cumulative Natural Gas Consumption (MMCF)
1 146
1-2 286
1-3 424
1-4 532
1-5 630
1-6 724
1-7 815
1-8 900
1-9 988
1-10 1080
1-11 1198
1-12 1318

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - The total natural gas usage for all emissions units at the facility. Natural gas usage for individual emissions units

does not have to be recorded.

Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)

During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit exceedance reports within 30 days following the end of each month during which an exceedance occurred that identify the following:
All exceedances of the maximum allowable cumulative natural gas usage during the first 12 calendar months of operation following the issuance of this permit.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,318 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emissions and the total amount of natural gas used at this facility during the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart I.3)

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation:

The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed twenty percent opacity for a three-minute average.

Applicable Compliance Method:

OAC Rule 3745-17-03 (B)(1), EPA Method nine (9).

Emission Limitation:

0.4 lb PM/hr

Applicable Compliance Method:

AP-42 Supplement F has an emission factor of 6.2 lbs PM/MM CF which shall be used to determine compliance.

F. Miscellaneous Requirements

1. By request of the applicant and pursuant to OAC 3745-35-07, the following listed Special Terms & Conditions are federally enforceable and incorporate limits on the potential to emit NOx for this emissions unit (P019) in combination with B005, B006, P003, P009, P015, P016, P017, P018, P023, P024 and other equipment exempt from permitting: A through F.

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

Facility ID: 1576000695 Emissions Unit ID: P023 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
31.5 MMBtu/hr natural gas fired forge/anneal furnace; Furnace No. 8 (with stack)	OAC Rule 3745-17-07, including but not limited to 3745-17-07(A) [6-14-91]	Visible Emission Limits (See Additional Terms & Conditions 2.b.)
	OAC Rule 3745-17-11, including but not limited to 3745-17-11(A) [6-14-91]	No process weight rate can be determined; therefore, no applicable emission limit.
	OAC Rule 3745-31-05 (PTI 15-1102)	0.18 lb PM/hr 0.79 ton PM/yr 1.04 lbs CO/hr 4.56 tons CO/yr

2. Additional Terms and Conditions

- The total NOx emissions from this facility shall not exceed 95 tons/yr. This emission limit shall be achieved by limiting the amount of natural gas burned at this facility. The burning of natural gas is the major source of NOx emissions at this site.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B005, B006, P003, P009, P015, P016, P017, P018, P019, P023, P024 and all exempted natural gas burning equipment.

Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions for this emissions unit's stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

B. Operational Restrictions

- Natural gas shall be the only fuel burned in this emissions unit.
- The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling twelve-month summation, with each month establishing a separate twelve-month period.
- To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) Allowable Total Cumulative Natural (After Permit Issuance) Gas Consumption (MMCF)

- 1 146
- 1-2 286
- 1-3 424
- 1-4 532
- 1-5 630
- 1-6 724
- 1-7 815
- 1-8 900
- 1-9 988
- 1-10 1080
- 1-11 1198
- 1-12 1318

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

- The permittee shall maintain records of the following information:
 The total natural gas usage for all emissions units at the facility. Natural gas usage for individual emissions units does not have to be recorded.
 Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
 During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

- The permittee shall submit exceedance reports within 30 days following the end of each month during which an exceedance occurred that identify the following:
 All exceedances of the maximum allowable cumulative natural gas usage during the first 12 calendar months of operation following the issuance of this permit.
 After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month

natural gas usage limitation of 1,318 MMCF.

2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emissions and the total amount of natural gas used at this facility during the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart I.3)

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation:

The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:

Opacity shall not exceed 20%, except for one 6-minute period in any hour when up to 60% is permissible.

Applicable Compliance Method:

OAC Rule 3745-17-03 (B)(1), EPA Method nine (9).

Emission Limitation:

0.18 lb PM/hr and 0.79 ton PM/yr

Applicable Compliance Method:

AP-42 Supplement F has an emission factor of 6.2 lbs PM/MMCF which shall be used to determine compliance. A BTU value for natural gas of 1060 BTUs per cubic foot shall be used in compliance method calculations.

Emission Limitation:

1.04 lbs CO/hr and 4.56 tons CO/yr

Applicable Compliance Method:

AP-42 Supplement F has an emission factor of 35 lbs CO/MMCF which shall be used to determine compliance. A BTU value for natural gas of 1060 BTUs per cubic foot shall be used in compliance method calculations.

F. Miscellaneous Requirements

1. By request of the applicant and pursuant to OAC 3745-35-07, the following listed Special Terms & Conditions are federally enforceable and incorporate limits on the potential to emit NOx for this emissions unit (P023) in combination with B005, B006, P003, P009, P015, P016, P017, P018, P019, P024 and other equipment exempt from permitting: A through F.

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

Facility ID: 1576000695 Emissions Unit ID: P024 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
31.5 MMBtu/hr natural gas fired forge/anneal furnace; Furnace No. 9 (with stack)	OAC Rule 3745-17-07, including but not limited to 3745-17-07(A) [6-14-91]	Visible Emission Limits (See Additional Terms & Conditions 2.b.)
	OAC Rule 3745-17-11, including but not limited to 3745-17-11(A) [6-14-91]	No process weight rate can be determined; therefore, no applicable emission limit.
	OAC Rule 3745-31-05 (PTI 15-1102)	1.04 lbs CO/hr 4.56 tons CO/yr 0.18 lb PM/hr 0.79 ton PM/yr

2. Additional Terms and Conditions

- (a) The total NOx emissions from this facility shall not exceed 95 tons/yr. This emission limit shall be achieved by limiting the amount of natural gas burned at this facility. The burning of natural gas is the major source of NOx emissions at this site.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B005, B006, P003, P009, P015, P016, P017, P018, P019, P023, P024 and all exempted natural gas burning equipment.
Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions for this emissions unit's stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

B. Operational Restrictions

- 1. Natural gas shall be the only fuel burned in this emissions unit.
- 2. The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling twelve-month summation, with each month establishing a separate twelve-month period.
- 3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) Allowable Total Cumulative Natural
(After Permit Issuance) Gas Consumption (MMCF)

- 1 146
- 1-2 286
- 1-3 424
- 1-4 532
- 1-5 630
- 1-6 724
- 1-7 815
- 1-8 900
- 1-9 988
- 1-10 1080
- 1-11 1198
- 1-12 1318

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain records of the following information:
The total natural gas usage for all emissions units at the facility. Natural gas usage for individual emissions units does not have to be recorded.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

- 1. The permittee shall submit exceedance reports within 30 days following the end of each month during which an exceedance occurred that identify the following:
All exceedances of the maximum allowable cumulative natural gas usage during the first 12 calendar months of operation following the issuance of this permit.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,318 MMCF.
- 2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emissions and the total amount of natural gas used at this facility during the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart I.3)

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation:

The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:

Opacity shall not exceed 20%, except for one 6-minute period in any hour when up to 60% is permissible.

Applicable Compliance Method:

OAC Rule 3745-17-03 (B)(1), EPA Method nine (9).

Emission Limitation

0.18 lb PM/hr and 0.79 ton PM/yr

Applicable Compliance Method:

AP 42 Supplement F has an emission factor of 6.2 lbs PM/MM CF which shall be used to determine compliance. A BTU value for natural gas of 1060 BTUs per cubic foot shall be used in compliance method calculations.

Emission Limitation

1.04 lb CO/hr and 4.56 tons CO/yr

Applicable Compliance Method:

AP 42 Supplement F has an emission factor of 35 lbs of CO/MM CF which shall be used to determine compliance. A BTU value for natural gas of 1060 BTUs per cubic foot shall be used in compliance method calculations.

F. Miscellaneous Requirements

1. By request of the applicant and pursuant to OAC 3745-35-07, the following listed Special Terms & Conditions are federally enforceable and incorporate limits on the potential to emit NOx for this emissions unit (P024) in combination with B005, B006, P003, P009, P015, P016, P017, P018, P019, P023 and other equipment exempt from permitting: A through F.