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Facility Name: **Sifco Industries Inc**

Application Number: **13-3267**

Date: **June 3, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Sifco Industries Inc** located in **Cuyahoga** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P023	Pickle Room/Line with 9 Acid Tanks, 7 Rinse Tanks, 28,000 acfm caustic (pH 7-10) packed tower scrubber with a mist eliminator.	Compliance with the terms and conditions of this permit and the use of a packed tower caustic scrubber: PM: 0.01 gr PM/dscf; 5% opacity as a 6-minute average for particulates mists. NO _x : 5.0 lb NO _x /hr	3745-31-05 3745-17-07 3745-17-08 3745-17-11	Particulate Matter (PM) 0.01 gr/dscf 2.4 lb/hr 57.6 lb/day 10.5 tons/year 5% opacity as a 6-minute average. Nitrogen Oxides: 5.0 lb/hr 120.0 lb/day 21.9 tons/year

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SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Federal Allowed Tons/Year</u>
Particulate Matter (PM)	10.5
Nitrogen Dioxide	21.9

CONSTRUCTION STATUS

The **Cleveland Air Pollution Control** shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: **Batch Pickle Room/Line**.

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Cleveland Air Pollution Control, 1925 St. Clair Avenue, Cleveland, Ohio 44114**.

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WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Cleveland Air Pollution Control, 1925 St. Clair Avenue, Cleveland, Ohio 44114.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA

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rules.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions

1. The pressure drop across the scrubber shall be continuously maintained at a value of 6.0 (plus or minus one) or at the value established during the most recent emission test that demonstrated that the emissions unit was in compliance at all times while the emissions unit was in operation.
2. The scrubber liquor recirculation rate shall be continuously maintained at not less than 300 gallons per minute at all times or at a rate not less than the rate established during the most recent emissions test that demonstrated that the emissions unit was in compliance at all times while the emissions unit was in operation.
3. The pH of the scrubber liquor shall be continuously maintained at no lower than 8 - 10 or no lower than the highest value of pH maintained during the most recent emissions test that demonstrated that the emissions unit was in compliance at all times while the emissions unit was in operation.
4. The permittee shall comply with the pretreatment standards for wastewater discharged from the brightener/passivation rinse tank to the POTW (Publicly Owned Treatment Works).

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B. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber, the scrubber liquor recirculation rate and to continuously monitor and record the pH of the scrubber liquor while the emissions unit is in operation. The monitoring devices and the pH recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
2. The permittee shall collect and record the following information each day:
 - a. the pressure drop across the scrubber, in inches of water, once at the beginning of each shift, on a daily basis;
 - b. the scrubber liquor recirculation rate, in gallons per minute, once at the beginning of each shift, on a daily basis;
 - c. the pH of the scrubber liquor, once at the beginning of each shift, on a daily basis; and,
 - d. a log or record of the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall monitor the treatment of the wastewater, sample the treated effluent for compliance with the effluent limitations (for Cd, Cr, Cu, Pb, Ni, Ag, Zinc and Cyanide) and maintain records of the effluent analyses.

C. Reporting Requirements

1. The permittee shall submit deviation (excursion)

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reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:

- a. the scrubber liquor pH;
 - b. the scrubber liquor recirculation rate; and,
 - c. the static pressure drop across the scrubber.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the treated effluent limitations were not maintained at the required levels.