

Facility ID: 1677010937 Issuance type: Final State Permit To Operate

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

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

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

Facility ID: 1677010937 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
Induction heating, followed with drying and grit blasting	OAC rule 3745-31-05 (PTI 16-479)	0.34 pound of particulate emissions (PE) per hour
	OAC rule 3745-17-07	1.5 tons of PE per year
	OAC rule 3745-17-11	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. The emissions from the induction heaters shall be vented to a wet scrubber when one or more of the induction heaters are in operation.
2. The emissions from the grit blasters shall be vented to the baghouse when one or more of the grit blasters are in operation.

C. Monitoring and/or Record Keeping Requirements

1. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across each scrubber, that must be maintained in order to demonstrate compliance, shall not be less than 12 inches of water.
2. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range or limit for the scrubber liquid flow rate for each scrubber, that shall be maintained in order to demonstrate compliance, shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted.
3. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range for the pH of the scrubber liquid, that shall be maintained in order to demonstrate compliance, is at 7.0 or above.
4. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record on a daily basis the pressure drop across each scrubber (in inches of water), the scrubber liquid flow rate (in gallons per minute), and the scrubber liquid pH during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the scrubber, the scrubber liquid's flow rate, and the scrubber's liquid's pH on a daily basis.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;

- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop, flow rate, and pH readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

These range(s) and/or limit(s) for the pressure drop, liquid flow rate, and pH are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop, liquid flow rate, or pH based upon information obtained during future emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- 5. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range for the pressure drop across the baghouse shall be between 2 to 4 inches of water.
- 6. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record on a daily basis the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
- 7. Whenever the monitored value for the pressure drop deviates from the limit or range specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- 8. The following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #16-479, issued on October 22, 1986: C.1, C.2, C.3, C.4, C.5, C.6 and C.7. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

D. Reporting Requirements

- 1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the wet scrubber during the operation of the controlled emissions unit(s):
 - a. each period of time when the pressure drop across the scrubber, the liquid flow rate, and/or the liquid pH was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
 - b. an identification of each incident of deviation described in "a" (above) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop, liquid flow rate, and/or scrubber liquid pH into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the baghouse during the operation of the emissions unit(s):

a. each period of time when the pressure drop across the baghouse was outside of the acceptable range;

b. an identification of each incident of deviation described in "a" (above) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

3. The following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #16-479, issued on October 22, 1986: D.1 and D.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

E. Testing Requirements

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

Emission Limitation:

0.34 pound of PE per hour

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation above shall be demonstrated by multiplying the PE factor of 0.01 pound of PE per pound of material processed* by the maximum material processed (in pounds) times (1-0.99**).

If required, compliance with the hourly allowable PE limitations above shall be determined by using the test method(s) and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A.

*Assume the metal pieces to be processed are 99% metal and 1% non-metal material (to be removed by the cleaning process). Also assume 100% of the non-metal material becomes airborne particulate matter during the process.

**The overall particulate emissions control efficiency (capture and design control) is 99%.

Emission Limitation:

1.5 tons of PE per year

Applicable Compliance Method:

The annual allowable PE limitation above was determined by multiplying the hourly allowable PE limitation by 8760 hours per year, and then dividing by 2000. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

Emission Limitation:

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

Applicable Compliance Method:

Compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

F. Miscellaneous Requirements

1. None