

Facility ID: 1677130061 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 P001](#)
[Go to Part II for Emissions Unit P002](#)

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

Facility ID: 1677130061 Emissions Unit ID: P001 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>
Induction Furnaces #1 & #2, air emissions of particulate matter vented to and controlled by a fabric filter	OAC rule 3745-31-05 (PTI 16-1128)	Combined emissions from P001 & P002 shall not exceed 2.0 lbs/hr of particulate matter and 0.05 lb/hr of lead.
	OAC rule 3745-17-07	The permittee shall employ hoods, ducts, fans and other equipment to adequately capture, contain and vent furnace emissions to a fabric filter. Such equipment shall be capable of eliminating or minimizing visible emissions at the point(s) of capture.
	OAC rule 3745-17-11	20% opacity from any stack, as a 6-minute average, except as provided by rule The mass particulate emissions limitation required by OAC rule 3745-17-11 is less stringent than the mass particulate emissions limitation established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions

- (a) The above hourly mass particulate matter and lead emission limitations, covered under OAC rule 3745-31-05, are greater than the potential to emit, as demonstrated below in section E.1. Therefore, no record keeping, reporting, or emissions calculations are required to demonstrate compliance with these emission limitations.

B. Operational Restrictions

1. The fabric filter serving this emissions unit shall be employed at all times the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall document whether or not the fabric filter serving this emissions unit was in service when the emissions unit was in operation.
2. The permittee shall perform daily visible particulate emission checks of the fabric filter control system serving this emissions unit, while the emissions unit is in operation. The presence of any visible emissions from the fabric filter control system shall be noted in an operations log. If any visible emissions are observed from the system, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter serving this emissions unit was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. The permittee shall submit on a semi-annual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the fabric filter control system and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31

of each year to the Director (District Office or local air agency).

3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation: 20% opacity from any stack, as a 6-minute average

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(1).
Emission Limitation: 2.0 lbs/hr of particulate matter

Applicable Compliance Method: The above emission limitation is greater than the potential to emit, as shown in the following equation:

$$E_{hpm} = (PWR_{max}) \times (EF_{pm});$$

Where,

$$E_{hpm} = 1.63 \text{ lbs/hr of particulate matter [combined hourly potential particulate matter emissions from P001 \& P002];}$$

$$PWR_{max} = 3 \text{ tons/hr [combined maximum process weight rate capacities of P001 \& P002]; and}$$

$$EF_{pm} = 0.543 \text{ lb of particulate matter emissions/ton of process weight [particulate matter emission factor developed at Akron RAQMD].}$$

$$\text{Emission Limitation: } 0.05 \text{ lb/hr of lead}$$

Applicable Compliance Method: The above emission limitation is greater than the potential to emit, as shown in the following equation:

$$E_{hl} = (PWR_{max}) \times (EF_l);$$

Where,

$$E_{hl} = 0.0145 \text{ lb/hr of lead [combined hourly potential lead emissions from P001 \& P002];}$$

$$PWR_{max} = 3 \text{ tons/hr [combined maximum process weight rate capacities of P001 \& P002]; and}$$

$$EF_l = 0.00483 \text{ lb of lead emissions/ton of process weight [lead emission factor developed at Akron RAQMD].}$$

F. Miscellaneous Requirements

1. None

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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>
Natural Gas-Fired Pot Furnaces #1 through #6, air emissions of particulate matter vented to and controlled by a fabric filter	OAC rule 3745-31-05 (PTI 16-1128)	Combined emissions from P001 & P002 shall not exceed 2.0 lbs/hr of particulate matter and 0.05 lb/hr of lead.

The permittee shall employ hoods, ducts, fans and

OAC rule 3745-17-07

OAC rule 3745-17-11

other equipment to adequately capture, contain and vent furnace emissions to a fabric filter. Such equipment shall be capable of eliminating or minimizing visible emissions at the point(s) of capture. 20% opacity from any stack, as a 6-minute average, except as provided by rule
The mass particulate emissions limitation required by OAC rule 3745-17-11 is less stringent than the mass particulate emissions limitation established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions

- (a) The above hourly mass particulate matter and lead emission limitations, covered under OAC rule 3745-31-05, are greater than the potential to emit, as demonstrated below in section E.1. Therefore, no record keeping, reporting, or emissions calculations are required to demonstrate compliance with these emission limitations.

B. Operational Restrictions

- 1. The fabric filter serving this emissions unit shall be employed at all times the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall document whether or not the fabric filter serving this emissions unit was in service when the emissions unit was in operation.
- 2. The permittee shall perform daily visible particulate emission checks of the fabric filter control system serving this emissions unit, while the emissions unit is in operation. The presence of any visible emissions from the fabric filter control system shall be noted in an operations log. If any visible emissions are observed from the system, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.

D. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter serving this emissions unit was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
- 2. The permittee shall submit on a semi-annual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the fabric filter control system and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).
- 3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

E. Testing Requirements

- 1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation: 20% opacity from any stack, as a 6-minute average

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(1).
Emission Limitation: 2.0 lbs/hr of particulate matter

Applicable Compliance Method: The above emission limitation is greater than the potential to emit, as shown in the following equation:

$$E_{hpm} = (PWR_{max}) \times (EF_{pm});$$

Where,

E_{hpm} = 1.63 lbs/hr of particulate matter [combined hourly potential particulate matter emissions from P001 & P002];

PWR_{max} = 3 tons/hr [combined maximum process weight rate capacities of P001 & P002]; and

EF_{pm} = 0.543 lb of particulate matter emissions/ton of process weight [particulate matter emission factor developed at Akron RAQMD].

Emission Limitation: 0.05 lb/hr of lead

Applicable Compliance Method: The above emission limitation is greater than the potential to emit, as shown in the following equation:

$$E_{hl} = (PWR_{max}) \times (EF_l);$$

Where,

E_{hl} = 0.0145 lb/hr of lead [combined hourly potential lead emissions from P001 & P002];

PWR_{max} = 3 tons/hr [combined maximum process weight rate capacities of P001 & P002]; and

EF_l = 0.00483 lb of lead emissions/ton of process weight [lead emission factor developed at Akron RAQMD].

F. Miscellaneous Requirements

1. None