



State of Ohio Environmental Protection Agency

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Columbus, Ohio 43215

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MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

2/24/2009

KRIS BUCK  
HOBART BROTHERS CO III  
101 TRADE SQUARE EAST  
TROY, OH 45373

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0855100420  
Permit Number: P0104071  
Permit Type: OAC Chapter 3745-31 Modification  
County: Miami

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Troy Daily News. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
RAPCA; Indiana

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director



PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
HOBART BROTHERS CO III

Issue Date: 2/24/2009  
Permit Number: P0104071  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Description: Modification to add existing soldering wire draw benches to an existing dust collector.  
Facility ID: 0855100420  
Facility Location: HOBART BROTHERS CO III  
8585 INDUSTRY PARK DRIVE,  
PIQUA, OH 30770  
Facility Description: Welding and Soldering Equipment Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Andrew Weisman at Regional Air Pollution Control Agency, 117 South Main Street or (937)225-4435. The permit can be downloaded from the Web page: [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc)





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Hobart Brothers (Facility ID 0855100420) is located in Piqua (Miami County) Ohio. Hobart Brothers currently operates 23 welding wire draw benches with fabric filters as 12 emissions units P008, P009, P010, P013 – P016, P018 – P021 and P023. Hobart Brothers has applied to install five new welding wire draw benches with a fabric filter to emissions unit P015.

3. Facility Emissions and Attainment Status:

Miami County is attainment for particulate matter. The potential uncontrolled particulate emissions from the facility are 92.7 tons per year prior to installation of the five new draw benches and 123 tons per year after installation.

4. Source Emissions:

All of the draw benches (new and existing) are equipped with fabric filters that have a design outlet concentration 0.01 grain particulate/dry standard cubic foot (dscf). The emissions from the addition of the five new draw benches based on the 0.01 gr/dscf and the air flow rate (28,000 cubic feet per minute (cfm)) of the fabric filter is 2.4 pounds per hour and 10.5 tons per year. The combined emissions limitation for the 18 existing draw benches is 12.0 lbs/hour and 52.7 tons per year. Therefore, this PTI will be issued as a synthetic minor PTI to limit potential particulate emissions to 63.3 tons per year (52.8 tons per year for 18 existing draw benches and 10.5 tons per year for 5 new draw benches).

5. Conclusion:

Hobart Brothers will be issued a synthetic minor PTI to limit particulate emissions from emissions units P008, P009, P010, P013 – P016, P018 – P021 and P023 to 63.3 tons per year on a rolling 12-month basis through the use of fabric filters that will limit the concentration of particulate emissions in the fabric filter exhaust to less than 0.01 grain/dscf. The synthetic minor particulate emissions restrictions will preclude compliance with Title V operating permit requirements.

6. Please provide additional notes or comments as necessary:

None



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Permit Strategy Write-Up**  
**Permit Number:** P0104071  
**Facility ID:** 0855100420

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
Particulate	63.3



**State of Ohio Environmental Protection Agency  
Division of Air Pollution Control**

**DRAFT**

**Air Pollution Permit-to-Install and Operate  
for  
HOBART BROTHERS CO III**

Facility ID: 0855100420  
Permit Number: P0104071  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 2/24/2009  
Effective: To be entered upon final issuance  
Expiration: To be entered upon final issuance





**Air Pollution Permit-to-Install and Operate**  
for  
**HOBART BROTHERS CO III**

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104071

**Facility ID:** 0855100420

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0855100420

Application Number(s): A0036306, A0036596

Permit Number: P0104071

Permit Description: Modification to add existing soldering wire draw benches to an existing dust collector.

Permit Type: OAC Chapter 3745-31 Modification

Permit Fee: \$500.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 2/24/2009

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

HOBART BROTHERS CO III  
8585 INDUSTRY PARK DRIVE  
PIQUA, OH 30770

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280  
(937)225-4435

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0104071

Permit Description: Modification to add existing soldering wire draw benches to an existing dust collector.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

**Emissions Unit ID:** P015  
 Company Equipment ID: M24  
 Superseded Permit Number: 08-04262  
 General Permit Category and Type: Not Applicable

**Group Name: DC4 and DC5**

<b>Emissions Unit ID:</b>	<b>P008</b>
Company Equipment ID:	M1-M4
Superseded Permit Number:	08-03990
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P009</b>
Company Equipment ID:	M10-M13
Superseded Permit Number:	08-03990
General Permit Category and Type:	Not Applicable

**Group Name: DC6**

<b>Emissions Unit ID:</b>	<b>P010</b>
Company Equipment ID:	M5
Superseded Permit Number:	08-04761
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P013</b>
Company Equipment ID:	M8
Superseded Permit Number:	08-03990
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P014</b>
Company Equipment ID:	M9
Superseded Permit Number:	08-03990
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P023</b>
Company Equipment ID:	M6
Superseded Permit Number:	08-04761
General Permit Category and Type:	Not Applicable

**Group Name: DC8**

<b>Emissions Unit ID:</b>	<b>P016</b>
Company Equipment ID:	M25
Superseded Permit Number:	08-04262
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P018</b>
Company Equipment ID:	M27
Superseded Permit Number:	08-04262
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P019</b>
Company Equipment ID:	M28
Superseded Permit Number:	08-04262



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104071

**Facility ID:** 0855100420

**Effective Date:** To be entered upon final issuance

General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P020</b>
Company Equipment ID:	M29
Superseded Permit Number:	08-04262
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P021</b>
Company Equipment ID:	M30
Superseded Permit Number:	08-04262
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104071

**Facility ID:** 0855100420

**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Regional Air Pollution Control Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104071

**Facility ID:** 0855100420

**Effective Date:** To be entered upon final issuance

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104071

**Facility ID:** 0855100420

**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



1. 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).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) 2., 3., and 4.
2. The particulate emissions from emissions units P008, P009, P010, P013 – P016, P018 – P021 and P023 shall not exceed 63.2 tons per rolling 12-month period, in accordance with OAC rule 3745-31-05(D) to avoid Title V operating permit requirements.
3. Compliance with the emissions limitations established according to OAC rule 3745-31-05(D) shall be demonstrated by the use of fabric filters designed to reduce the concentration of particulate matter to 0.01 grain per dry standard cubic foot (gr/dscf) of exhaust, pressure drop monitoring, record keeping, reporting and compliance methods listed in Section C.
4. Compliance with the emission limitations in B.2. shall be determined in accordance with the following method:
  - a) Emission Limitation:

The particulate emissions from emissions units P008, P009, P010, P013 – P016, P018 – P021 and P023 shall not exceed 63.2 tons per rolling 12-month period.

Applicable Compliance Method:

The 63.2 TPY emission limitation was developed by multiplying the 14.4 lbs/hour sum of the hourly emissions limits for emissions units P008, P009, P010, P013 – P016, P018 – P021 and P023 by 8,760 hours/year, divided by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly emissions limitations for each emissions unit, compliance is also shown with the combined rolling allowable mass emission rate.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104071

**Facility ID:** 0855100420

**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. P015, Tubular wire draw benches M17, M19, M20, M20, M22, and M24**

**Operations, Property and/or Equipment Description:**

Tubular wire draw bench benches M17, M19, M20, M20, M22, and M24 with fabric filter (DC7)

a) 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. c)(1), d)(1), e)(1) and f)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The particulate emissions from this emissions unit shall not exceed 0.01 grain/dry standard cubic foot (dscf) of exhaust, 2.40 lbs/hour and 10.5 tons per year (TPY).  Visible particulate emissions from any stack shall not exceed 5 percent opacity as a six-minute average.
b.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 3745-31-05(A)(3).



(2) Additional Terms and Conditions

- a. The permittee shall implement an operation and maintenance (O&M) plan for this emissions unit and its respective air pollution control system. The O&M plan shall include, but not be limited to, the specific steps taken and/or the specific items checked on a routine basis to ensure optimum operation of the emissions unit and its respective air pollution control system. The O&M plan shall be submitted to the Regional Air Pollution Control Agency upon request.

c) Operational Restrictions

- (1) The filter media used in the fabric filter shall be designed to limit particulate emissions to less than 0.01 grain/dry standard cubic foot of exhaust.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the fabric filter when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the fabric filter on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and operating manual(s).

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with 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:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;



- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. 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 fabric filter 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.

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any deviation or exceedance of a federally enforceable requirement contained in this permit to include:



- a. each period of time (start time and date, and end time and date) when the pressure drop across the fabric filter was outside of the acceptable range;
- b. all deviations from the following restricted, federally enforceable emission limitation(s), operational restriction(s), and/or other control device operating parameter limitation(s) that restrict the pollutant's(s') Potential to Emit (PTE) and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
- c. The filter media used in the fabric filter shall be designed to limit particulate emissions to less than 0.01 grain/dry standard cubic foot of exhaust.
- d. an identification of each incident of deviation described in Aa@, "b", or "c" (above) where a prompt investigation was not conducted;
- e. an identification of each incident of deviation described in Aa@ 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;
- f. an identification of each incident of deviation described in Ab@ where prompt corrective action, that would bring the emissions unit(s) into compliance with any federally enforceable emission limitation(s), operational restriction(s), and/or other control device operating parameter limitation(s), was determined to be necessary and was not taken;
- g. an identification of each incident of deviation described in Aa@ or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
- h. the probable cause of each deviation;
- i. any corrective actions that were taken to remedy the deviations or prevent future deviations; and
- j. the level or magnitude of excursion above the acceptable restricted limitation(s), operational restriction(s), and/or control device parameter limitation(s) and the duration (number of hours and date) of each deviation.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:



- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

- a. Emission Limitation -

The particulate emissions from this emissions unit shall not exceed 0.01 grain/dscf.

Applicable Compliance Method -

Compliance shall be demonstrated based on the design specifications of the filter media used in the fabric filter.

When requested, compliance shall be determined by stack testing performed in accordance with the methods and procedures specified in Reference Method 5 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation -

The particulate emissions from this emissions unit shall not exceed 2.40 lbs/hour.

Applicable Compliance Method -

The 2.40 lbs/hour limitation is based upon the 0.01 grain/dscf multiplied by the design flow rate of the fabric filter (28,000 cfm), divided by 7,000 grains/pound and multiplied by 60 minutes/hour.

When requested, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(10) using the methods and procedures specified in Reference Method 5 of 40 CFR Part 60, Appendix A.

- c. Emission Limitation:

The particulate emissions from this emissions unit shall not exceed 10.5 TPY.

Applicable Compliance Method:

The 10.5 TPY emission limitation was developed by multiplying the 2.40 lbs/hour limit by 8,760 hours/year, divided by 2,000 pounds per ton. Therefore, provided



compliance is shown with the hourly emissions limitation, compliance is also shown with the annual allowable mass emission rate.

d. Emission Limitation

Visible particulate emissions from any/the stack shall not exceed 5 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

When requested, compliance shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in Reference Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) The terms and conditions of this PTIO supersede those identified in PTI 08-04262 issued February 15, 2005 and the PTO issued 5/10/2007.



**2. Emissions Unit Group - DC4 and DC5: P008, P009,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P008	Tubular wire draw benches M1, M2, M3, and M4 with fabric filter (DC5)
P009	tubular wire draw benches M10, M11, M12, and M13 with fabric filter (DC4)

a) 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. c)(1), d)(1), e)(1) and f)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3)	The particulate emissions from these emissions units shall not exceed 0.01 grain/dry standard cubic foot (dscf) of exhaust, 3.21 lbs/hour and 14.1 tons per year (TPY).  Visible particulate emissions from any stack shall not exceed 5 percent opacity as a six-minute average.
b.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 3745-31-05(A)(3).



(2) Additional Terms and Conditions

- a. The permittee shall implement an operation and maintenance (O&M) plan for this emissions unit and its respective air pollution control system. The O&M plan shall include, but not be limited to, the specific steps taken and/or the specific items checked on a routine basis to ensure optimum operation of the emissions unit and its respective air pollution control system. The O&M plan shall be submitted to the Regional Air Pollution Control Agency upon request.

c) Operational Restrictions

- (1) The filter media used in the fabric filter shall be designed to limit particulate emissions to less than 0.01 grain/dry standard cubic foot of exhaust.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the fabric filter when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the fabric filter on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and operating manual(s).

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with 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:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;



- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. 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 fabric filter 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.

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any deviation or exceedance of a federally enforceable requirement contained in this permit to include:



- a. each period of time (start time and date, and end time and date) when the pressure drop across the fabric filter was outside of the acceptable range;
- b. all deviations from the following restricted, federally enforceable emission limitation(s), operational restriction(s), and/or other control device operating parameter limitation(s) that restrict the pollutant's(s') Potential to Emit (PTE) and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
- c. The filter media used in the fabric filter shall be designed to limit particulate emissions to less than 0.01 grain/dry standard cubic foot of exhaust.
- d. an identification of each incident of deviation described in Aa@, "b", or "c" (above) where a prompt investigation was not conducted;
- e. an identification of each incident of deviation described in Aa@ 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;
- f. an identification of each incident of deviation described in Ab@ where prompt corrective action, that would bring the emissions unit(s) into compliance with any federally enforceable emission limitation(s), operational restriction(s), and/or other control device operating parameter limitation(s), was determined to be necessary and was not taken;
- g. an identification of each incident of deviation described in Aa@ or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
- h. the probable cause of each deviation;
- i. any corrective actions that were taken to remedy the deviations or prevent future deviations; and
- j. the level or magnitude of excursion above the acceptable restricted limitation(s), operational restriction(s), and/or control device parameter limitation(s) and the duration (number of hours and date) of each deviation.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:



- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

- a. Emission Limitation -

The particulate emissions from this emissions unit shall not exceed 0.01 grain/dscf.

Applicable Compliance Method -

Compliance shall be demonstrated based on the design specifications of the filter media used in the fabric filter.

When requested, compliance shall be determined by stack testing performed in accordance with the methods and procedures specified in Reference Method 5 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation -

The particulate emissions from this emissions unit shall not exceed 3.21 lbs/hour.

Applicable Compliance Method -

The 3.21 lbs/hour limitation is based upon the 0.01 grain/dscf multiplied by the design flow rate of the fabric filter (37,500 cfm for both fabric filters), divided by 7,000 grains/pound and multiplied by 60 minutes/hour.

When requested, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(10) using the methods and procedures specified in Reference Method 5 of 40 CFR Part 60, Appendix A.

- c. Emission Limitation:

The particulate emissions from this emissions unit shall not exceed 14.1 TPY.

Applicable Compliance Method:

The 14.1 TPY emission limitation was developed by multiplying the 3.21 lbs/hour limit by 8,760 hours/year, divided by 2,000 pounds per ton. Therefore, provided



compliance is shown with the hourly emissions limitation, compliance is also shown with the annual allowable mass emission rate.

d. Emission Limitation

Visible particulate emissions from any/the stack shall not exceed 5 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

When requested, compliance shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in Reference Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) The terms and conditions of this PTIO supersede those identified in PTIs 08-03990 issued February 15, 2005, PTI 08-04761 issued 6/8/2006 and the PTOs issued 5/10/2007.



**3. Emissions Unit Group - DC6: P010, P013, P014, P023,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P010	Welding Wire Draw Bench M5 with fabric filter (DC6)
P013	tubular wire draw bench M8 with fabric filter (DC6)
P014	tubular wire draw bench M9 with fabric filter (DC6)
P023	Welding Wire Draw Bench M6 with fabric filter (DC6)

a) 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. c)(1), d)(1), e)(1) and f)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The particulate emissions from these emissions units shall not exceed 0.01 grain/dry standard cubic foot (dscf) of exhaust, 0.80 lb/hour and 3.51 tons per year (TPY).  Visible particulate emissions from any stack shall not exceed 5 percent opacity as a six-minute average.
b.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 3745-31-05(A)(3).



(2) Additional Terms and Conditions

- a. The permittee shall implement an operation and maintenance (O&M) plan for this emissions unit and its respective air pollution control system. The O&M plan shall include, but not be limited to, the specific steps taken and/or the specific items checked on a routine basis to ensure optimum operation of the emissions unit and its respective air pollution control system. The O&M plan shall be submitted to the Regional Air Pollution Control Agency upon request.

c) Operational Restrictions

- (1) The filter media used in the fabric filter shall be designed to limit particulate emissions to less than 0.01 grain/dry standard cubic foot of exhaust.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the fabric filter when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the fabric filter on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and operating manual(s).

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with 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:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;



- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. 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 fabric filter 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.

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any deviation or exceedance of a federally enforceable requirement contained in this permit to include:



- a. each period of time (start time and date, and end time and date) when the pressure drop across the fabric filter was outside of the acceptable range;
- b. all deviations from the following restricted, federally enforceable emission limitation(s), operational restriction(s), and/or other control device operating parameter limitation(s) that restrict the pollutant's(s') Potential to Emit (PTE) and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
- c. The filter media used in the fabric filter shall be designed to limit particulate emissions to less than 0.01 grain/dry standard cubic foot of exhaust.
- d. an identification of each incident of deviation described in Aa@, "b", or "c" (above) where a prompt investigation was not conducted;
- e. an identification of each incident of deviation described in Aa@ 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;
- f. an identification of each incident of deviation described in Ab@ where prompt corrective action, that would bring the emissions unit(s) into compliance with any federally enforceable emission limitation(s), operational restriction(s), and/or other control device operating parameter limitation(s), was determined to be necessary and was not taken;
- g. an identification of each incident of deviation described in Aa@ or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
- h. the probable cause of each deviation;
- i. any corrective actions that were taken to remedy the deviations or prevent future deviations; and
- j. the level or magnitude of excursion above the acceptable restricted limitation(s), operational restriction(s), and/or control device parameter limitation(s) and the duration (number of hours and date) of each deviation.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:



- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

- a. Emission Limitation -

The particulate emissions from this emissions unit shall not exceed 0.01 grain/dscf.

Applicable Compliance Method -

Compliance shall be demonstrated based on the design specifications of the filter media used in the fabric filter.

When requested, compliance shall be determined by stack testing performed in accordance with the methods and procedures specified in Reference Method 5 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation -

The particulate emissions from this emissions unit shall not exceed 0.80 lb/hour.

Applicable Compliance Method -

The 0.80 lb/hour limitation is based upon the 0.01 grain/dscf multiplied by the design flow rate of the fabric filter (37500 cfm), divided by 7,000 grains/pound, multiplied by 60 minutes/hour and divided by 4 draw benches that exhaust through dust collector DC6.

When requested, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(10) using the methods and procedures specified in Reference Method 5 of 40 CFR Part 60, Appendix A.

- c. Emission Limitation:

The particulate emissions from this emissions unit shall not exceed 3.51 TPY.

Applicable Compliance Method:



The 3.51 TPY emission limitation was developed by multiplying the 0.80 lb/hour limit by 8,760 hours/year, divided by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly emissions limitation, compliance is also shown with the annual allowable mass emission rate.

d. Emission Limitation

Visible particulate emissions from any/the stack shall not exceed 5 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

When requested, compliance shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in Reference Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) The terms and conditions of this PTIO supersede those identified in PTI 08-03990 issued February 15, 2005 and the PTOs issued 2/5/2007 and 5/10/2007.



**4. Emissions Unit Group - DC8: P016, P018, P019, P020, P021,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P016	Tubular wire draw bench M25 with fabric filter (DC8)
P018	Tubular wire draw bench M27 with fabric filter (DC8)
P019	Tubular wire draw bench M28 with fabric filter (DC8)
P020	Tubular wire draw bench M29 with fabric filter (DC8)
P021	Tubular wire draw bench M30 with fabric filter (DC8)

a) 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. c)(1), d)(1), e)(1) and f)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The particulate emissions from these emissions units shall not exceed 0.01 grain/dry standard cubic foot (dscf) of exhaust, 0.48 lb/hour and 2.10 tons per year (TPY).  Visible particulate emissions from any stack shall not exceed 5 percent opacity as a six-minute average.
b.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 3745-



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		31-05(A)(3).

(2) Additional Terms and Conditions

a. The permittee shall implement an operation and maintenance (O&M) plan for this emissions unit and its respective air pollution control system. The O&M plan shall include, but not be limited to, the specific steps taken and/or the specific items checked on a routine basis to ensure optimum operation of the emissions unit and its respective air pollution control system. The O&M plan shall be submitted to the Regional Air Pollution Control Agency upon request.

c) Operational Restrictions

(1) The filter media used in the fabric filter shall be designed to limit particulate emissions to less than 0.01 grain/dry standard cubic foot of exhaust.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the fabric filter when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the fabric filter on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and operating manual(s).

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with 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:

- a. a description of the corrective action;



- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. 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 fabric filter 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.

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

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any deviation or exceedance of a federally enforceable requirement contained in this permit to include:
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the fabric filter was outside of the acceptable range;
  - b. all deviations from the following restricted, federally enforceable emission limitation(s), operational restriction(s), and/or other control device operating parameter limitation(s) that restrict the pollutant's(s') Potential to Emit (PTE) and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - c. The filter media used in the fabric filter shall be designed to limit particulate emissions to less than 0.01 grain/dry standard cubic foot of exhaust.
  - d. an identification of each incident of deviation described in Aa@, "b", or "c" (above) where a prompt investigation was not conducted;
  - e. an identification of each incident of deviation described in Aa@ 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;
  - f. an identification of each incident of deviation described in Ab@ where prompt corrective action, that would bring the emissions unit(s) into compliance with any federally enforceable emission limitation(s), operational restriction(s), and/or other control device operating parameter limitation(s), was determined to be necessary and was not taken;
  - g. an identification of each incident of deviation described in Aa@ or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
  - h. the probable cause of each deviation;
  - i. any corrective actions that were taken to remedy the deviations or prevent future deviations; and
  - j. the level or magnitude of excursion above the acceptable restricted limitation(s), operational restriction(s), and/or control device parameter limitation(s) and the duration (number of hours and date) of each deviation.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October



(covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:

- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. Emission Limitation -

The particulate emissions from this emissions unit shall not exceed 0.01 grain/dscf.

Applicable Compliance Method -

Compliance shall be demonstrated based on the design specifications of the filter media used in the fabric filter.

When requested, compliance shall be determined by stack testing performed in accordance with the methods and procedures specified in Reference Method 5 of 40 CFR Part 60, Appendix A.

b. Emission Limitation -

The particulate emissions from this emissions unit shall not exceed 0.48 lb/hour.

Applicable Compliance Method -

The 0.48 lb/hour limitation is based upon the 0.01 grain/dscf multiplied by the design flow rate of the fabric filter (28,000 cfm), divided by 7,000 grains/pound, multiplied by 60 minutes/hour and divided by 5 draw benches that exhaust through dust collector DC8.

When requested, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(10) using the methods and procedures specified in Reference Method 5 of 40 CFR Part 60, Appendix A.



c. Emission Limitation:

The particulate emissions from this emissions unit shall not exceed 2.10 TPY.

Applicable Compliance Method:

The 2.10 TPY emission limitation was developed by multiplying the 0.48 lb/hour limit by 8,760 hours/year, divided by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly emissions limitation, compliance is also shown with the annual allowable mass emission rate.

d. Emission Limitation

Visible particulate emissions from any/the stack shall not exceed 5 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

When requested, compliance shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in Reference Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) The terms and conditions of this PTIO supersede those identified in PTI 08-04262 issued February 15, 2005.