State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

04/29/03

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

13-18-12-1632
Wellman Friction Products Brook Park
Peggy Mullins
920 Lake Road
Medina, OH 44256

Dear Peggy Mullins:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Cleveland Division of Air Pollution Control.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Cleveland Division of Air Pollution Control
File, DAPC PMU

State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: **04/29/03**	Effective Date: **05/20/03**	Expiration Date: **05/20/08**

This document constitutes issuance of a Title V permit for Facility ID: 13-18-12-1632 to:
Wellman Friction Products Brook Park
5372 West 130th Street
Brook Park, OH 44142

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

L002 (Conveyorized Vapor Degreaser)
Detrex Conveyorized Vapor Degreaser using Perchloroethylene

P002 (Powder Mixing Line)
A Powder Mixing Line Consisting of Various Blenders for Mixing Powder Metals

P003 (18" Sintering Furnace #6)
18" Sintering Furnace #6

P004 (Tool Room Metal Working & Miscellaneous Equipment)
Various Metal Working Equipment such as Bandsaws, Lathes, Grinders, Cup Welder, Mold Presses, Knuckle Press used for Tool Making

P006 (Nitriding Furnace Line)
Ammonia Base Electric Furnaces used for Nitriding Splines on Metal Discs

P007 (Commercial Finishing Line)
Various Sanders, Grinders and Groovers used for Machining Sintered Metallic Friction Materials

P008 (Commercial Molding Line)
Various Presses for Molding Powdered Metal Parts W/ Portable Roller Coaters for Applying Graphite

P012 (24" Sintering Furnace #7)
24" Sintering Furnace #7

P013 (HDT Manufacturing Line)
HDT (Graphitic) Friction Disc Manufacturing Line Consisting of Various Mixing, Molding, Sanding and Grinding Equipment

P015 (Grit Blast Machine)
Grit Blast Machine

P016 (5 electric furnaces #1 to #5)
5 electric furnaces using nitrogen, disassociated ammonia and exothermic gas atmosphere for sintering. Each furnace has an integral flame curtain.

P017 (Metal Finishing Line)
Metal Finishing Line Using Speed Sanders For Sanding Metal Discs to Specified Micro Finish

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Cleveland Division of Air Pollution Control
1925 St. Clair
Cleveland, OH 44114
(216) 664-2324

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

(a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii)

pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) ,(ii) and (iii))

(b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))

iii. **For monitoring, record keeping, and reporting requirements:**
Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month

period, the permittee shall submit a semi-annual report which states that no deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit(s) or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.
(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after

promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
ii. Compliance certifications shall include the following:
(a) An identification of each term or condition of this permit that is the basis of the certification.
(b) The permittee's current compliance status.
(c) Whether compliance was continuous or intermittent.
(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations,

operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

5. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

6. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. All asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements specified in 40 CFR Part 61 and OAC Chapter 3745-20.

2. 40 CFR 63 Subpart QQQQQ (final rule October 18, 2002) applies to the owner or operator of a friction materials manufacturing facility that is also a major sources of hazardous air pollutants.

Friction materials manufacturing facility means a facility that manufactures friction materials using a solvent based process. Friction materials are used in the manufacture of products used to accelerate or decelerate objects. Products that use friction materials include, but are not limited to, disc brake pucks, disc brake pads, brake linings, brake shoes, brake segments, brake blocks, brake discs, clutch facings, and and clutches.

Information provided by the permittee indicates that the facility regulated under this permit does not use a solvent based process in its manufacture of friction materials, and, therefore, does not meets the applicability criteria of Subpart QQQQQ.

In the event of physical changes or changes in the method of operation at this facility that result in the facility meeting the definition of a "friction products manufacturing facility," as defined in 40 CFR 63.9565, the facility must not only meet preconstruction requirements of OAC Rule 3745-31 in accordance with the General Terms and Conditions of this permit, but also must comply with the requirements under Subpart QQQQQ upon initial startup. [40 CFR 63.9495(b)]

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

Z001 paved roadways & parking areas;
Z002 dissociated ammonia (da) cracker 1 - 1.05 MMBtu/hr;
Z003 da cracker 2 - 1.05 MMBtu/hr;
Z004 da cracker 3 - 1.05 MMBtu/hr;
Z005 EXO cracker 1 - 6000 scfh;
Z006 EXO Cracker 2 - 6000 scfh;
Z007 AMU 1 (Aerovent) - 4 MMBtu/hr;
Z008 AMU 2 (Aerovent) - 5 MMBtu/hr;
Z009 AMU 3 (Rupp) - 4.05 MMBtu/hr;
Z010 AMU 4 (Rupp) - 4.05 MMBtu/hr;
Z011 coiners, dust collector, vent to building;
Z012 cold cleaner 1;
Z013 cold cleaner tank 2 with rust preventative & less than 10 square feet liquid surface;
Z014 cold cleaner dip tank 1 with rust preventative & less than 10 square feet liquid surface;
Z015 cold cleaner dip tank 2 with rust preventative & less than 10 square feet liquid surface;
Z016 cold cleaner dip tank 3 with rust preventative & less than 10 square feet liquid surface; and
Z017 cold cleaner dip tank 4 with rust preventative & less than 10 square feet liquid surface.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Conveyorized Vapor Degreaser (L002)

Activity Description: Detrex Conveyorized Vapor Degreaser using Perchloroethylene

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
L002: Detrex in-line conveyorized vapor degreaser with 159.25 square feet of solvent/air interface and using perchloroethylene	40 CFR 63, Subpart T	idling emission limit of 0.021 pound per hour per square foot See Additional Terms and Conditions 2.a through 2.e.
	OAC rule 3745-21-09(O)(6)(b)	This emissions unit is exempt from the requirements of OAC rule 3745-21-09(O)(2) through (O)(5).
	OAC rule 3745-31-05(A)(3) (PTI #13-3589)	9.66 lbs OC/hr See Additional Term and Condition 2.e. 42.31 tons OC/year The requirements of this rule also include compliance with the requirements of 40 CFR 63, Subpart T.

2. Additional Terms and Conditions

2.a The permittee shall achieve and maintain an idling emission limit of 0.10 kilograms per hour per square meter (0.021 pound per hour per square foot) of solvent/air interface area as determined using the procedures in 40 CFR 63.465 (a) and 40 CFR 63, Appendix A.

2. Additional Terms and Conditions (continued)

2.b The permittee shall perform the following activities:

i. Conduct an initial performance test or submit the information specified in Section A.V.2.a within 6 months after issuance of this permit in order to demonstrate compliance with the idling emission limit and establish the parameters that will be monitored to demonstrate compliance.

ii. Conduct the periodic monitoring of the parameters used to demonstrate compliance as described in the "Monitoring and/or Recordkeeping Requirements" section of this permit.

iii. Operate the solvent cleaning machine within the parameters identified in the initial performance test.

In accordance with the procedures specified in 40 CFR 63.468(d)(6)(iv)(B) the permittee conducted idling emission rate test(s) on September 6, 7 and 14, 2001. Pursuant to these tests, the permittee submitted a report to the Cleveland Division of Air Pollution Control on January 11, 2002. The results of these tests demonstrated compliance with the idling emission limitation.

2.c The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:

i. An idling and downtime mode cover that shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place. The cover must be able to be readily opened or closed, must completely cover the cleaning machine openings when in place, and must be free of cracks, holes and other defects.

ii. The solvent cleaning machine shall have a freeboard ratio of 0.75 or greater.

iii. The solvent cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.

iv. The solvent cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.

v. The solvent cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.

vi. The solvent cleaning machine shall have a primary condenser.

2.d The permittee shall comply with the following requirements:

i. Ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.

ii. Ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.

2.e The lbs OC/hr limit was established for permit to install (PTI) purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping, and/or reporting requirements to ensure compliance with this limit.

II. Operational Restrictions

1. The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:

1.a Control air disturbances across the solvent cleaning machine opening(s) by incorporating the following control equipment or techniques:

i. Cover(s) for the solvent cleaning machine shall be in place during the idling mode and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.

II. Operational Restrictions (continued)

1.b Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).

1.c Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Director (the appropriate Ohio EPA District Office or local air agency).

1.d Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.

1.e During start-up of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.

1.f During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.

1.g When solvent is added to or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.

1.h The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Director (the appropriate Ohio EPA District Office or local air agency) to achieve the same or better results as those recommended by the manufacturer.

1.i The permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR Part 63, Appendix B if requested during an inspection by the Director (the appropriate Ohio EPA District Office or local air agency).

1.j Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container.

1.k Sponges, fabric, wood, and paper products shall not be cleaned.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor the hoist speed as described in A.III.1.a - A.III.1.d below:

1.a The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).

1.b The permittee shall conduct monthly monitoring of the hoist speed. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly.

1.c If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.

1.d If the permittee can demonstrate to the satisfaction of the Director (the appropriate Ohio EPA District Office or local air agency) in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

2. The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:

2.a Owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment.

2.b The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.

2.c Records of the halogenated HAP solvent content for the solvent used in the solvent cleaning machine.

III. Monitoring and/or Record Keeping Requirements (continued)

2.d The permittee shall maintain records of the initial performance test, including the idling emission rate and values of the monitoring parameters measured during the test. These records shall be maintained for the lifetime of the solvent cleaning machine.

2.e The permittee shall conduct monitoring and record the results on a monthly basis for the idling-mode cover by conducting a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes and other defects.

3. The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:

3.a The results of control device monitoring required in this section of the permit.

3.b Information on the actions taken to comply with 40 CFR 63.463 (e) and (f), including records of written or verbal orders for replacement parts, a description of the repair made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.

3.c Estimates of annual perchloroethylene consumption for the solvent cleaning machine.

IV. Reporting Requirements

1. The permittee shall submit an annual report by February 1 of each year for the preceding year. Each annual report shall contain the following:

a. A signed statement from the facility owner or their designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required pursuant to 40 CFR 60.463(d)(10)."

b. An estimate of solvent consumption during the reporting period and the annual total OC emissions as calculated according to the "Testing Requirements" section of this permit.

2. The permittee shall submit an exceedance report on a semiannual basis. If the cover did not completely cover the cleaning machine openings when in place whenever parts were not in the solvent cleaning machine and/or if the cover had cracks, holes or other defects and no correction was made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Director (appropriate District Office or local air agency). The permittee may receive approval of less frequent reporting if the following conditions are met: (1) The emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Director (appropriate District Office or local air agency) does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e) (3) (iii) of subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:

a. The reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463 (e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.

b. If no exceedance has occurred, a statement to that effect shall be submitted.

V. Testing Requirements

1. If required, the permittee shall determine the idling emission rate of the solvent cleaning machine using Reference Method 307 in 40 CFR Part 63, Appendix A.

V. Testing Requirements (continued)

2. The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The potential to emit shall be determined in accordance with the following procedures:

a. Determine the potential to emit for each individual solvent cleaning machine using the following equation:

PTEi = Hi X Wi X SAIi

Where:

PTEi = the potential to emit for the solvent cleaning machine i (kilograms solvent per year).

Hi = hours of operation for solvent cleaning machine i (hours per year).

= 8760 hours per year, unless otherwise restricted by a federally enforceable requirement.

Wi = the working mode uncontrolled emission rate (kilograms per square meter per hour).

= 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines.

= 1.12 kilograms per square meter per hour for in-line cleaning machines.

SAIi = solvent/air interface area of solvent cleaning machine i (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent /air interface. Cleaning machines that do not have a solvent area interface shall calculate a solvent/air interface area using the procedure in paragraph (b) below.

b. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the following equation:

SAI = 2.2 * (Vol)^0.6

Where:

SAI = the solvent/air interface area (square meters).

Vol = the cleaning capacity of the solvent cleaning machine (cubic meters).

c. Sum the PTEi for all solvent cleaning machines.

V. Testing Requirements (continued)

3. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:
42.31 tons/year of OC emissions

Applicable Compliance Method:
To determine the actual organic compound emission rate, the following equation shall be used:

E= (Ls-Lw) x D/2000

E= organic compound emissions rate (tons/year)

Ls= liquid volume of cleaning solvent employed each year (gallons)

Lw= liquid volume of cleaning solvent sent off site as waste (gallons)

D= density of cleaning solvent (pounds/gallon)

If more than one type of cleaning solvent is employed, the above equation shall be used for each cleaning solvent. The total annual organic compound emission rate shall be determined by the summation of the annual organic compound emission rates for all cleaning solvents.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Powder Mixing Line (P002)

Activity Description: A Powder Mixing Line Consisting of Various Blenders for Mixing Powder Metals

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P002: metal powders mixing line with a baghouse	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 2.31 pounds per hour.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

2.a All PE from this emissions unit shall be vented to the baghouse.

II. Operational Restrictions

1. Except as provided below, the pressure drop across the baghouse shall be maintained within the range of 0.2 to 2.0 inches of water column while the emissions unit is in operation.

This operational restriction shall not apply during the first 3 days of operation following any bag changes.

During these periods of time in which the operational restriction does not apply, the permittee shall perform daily visible emission checks as specified in Section A.III.2.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 except as specified in A.II.1.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Director (the appropriate Ohio EPA District Office or local air agency), compliance with the mass emission limitation and visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using US EPA - approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitation.

III. Monitoring and/or Record Keeping Requirements (continued)

2. Following replacement of bags in the baghouse and for the period of time indicated in section A.II.1, 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 baghouse 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 eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when pressure drop monitoring is required and during which the pressure drop across the baghouse did not comply with the allowable range specified above.

2. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

3. The permittee shall submit semiannual written reports when daily visible emission checks are required that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Emission Limitation:
20% opacity, as a six-minute average

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

2. Emission Limitation:
2.31 pounds PE per hour

Applicable Compliance Method:
If required, compliance with this emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 18" Sintering Furnace #6 (P003)

Activity Description: 18" Sintering Furnace #6

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P003: natural gas-fired 18" continuous sintering furnace #6	OAC rule 3745-31-05(A)(3) (PTI #13-2664a issued/effective June 3, 1993)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11. Visible particulate emissions from any stack shall not exceed 5% opacity as a six-minute average. There shall be no objectionable odors from this emissions unit.
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 lb/hr.
	OAC rule 3745-17-07(A)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emission unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

IV. Reporting Requirements (continued)

2. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

V. Testing Requirements

1. Emission Limitation:
5% opacity as a 6-minute average

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

2. Emission Limitation:
0.551 pound PE per hour

Applicable Compliance Method:
If required, compliance with this emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Tool Room Metal Working & Miscellaneous Equipment (P004)

Activity Description: Various Metal Working Equipment such as Bandsaws, Lathes, Grinders, Cup Welder, Mold Presses, Knuckle Press used for Tool Making

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P004: metal working equipment such as bandsaws, lathes, grinders, cup welder, mold presses, knuckle press used for tool making equipped with a baghouse	OAC rule 3745-17-11(B)	Visible particulate emissions from any stack shall not exceed 3.47 pounds per hour.
	OAC rule 3745-17-07(A)	20% opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

2.a All PE from this emissions unit shall be vented to the baghouse.

II. Operational Restrictions

1. Except as provided below, the pressure drop across the baghouse shall be maintained within the range of 0.5 to 3.0 inches of water column while the emissions unit is in operation.

This operational restriction shall not apply during the first 3 days of operation following any bag changes.

During these periods of time in which the operational restriction does not apply, the permittee shall perform daily visible emission checks as specified in Section A.III.2.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 except as specified in A.II.1.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Director (the appropriate Ohio EPA District Office or local air agency), compliance with the mass emission limitation and visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using US EPA - approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitation.

III. Monitoring and/or Record Keeping Requirements (continued)

2. Following replacement of bags in the baghouse and for the period of time indicated in section A.II.1, 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 baghouse 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 eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when pressure drop monitoring is required and during which the pressure drop across the baghouse did not comply with the allowable range specified above.

2. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

3. The permittee shall submit semiannual written reports when daily visible emission checks are required that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Emission Limitation:
3.47 pounds PE per hour

Applicable Compliance Method:
If required, compliance with this emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

2. Emission Limitation:
20% opacity as a six-minute average.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Nitriding Furnace Line (P006)

Activity Description: Ammonia Base Electric Furnaces used for Nitriding Splines on Metal Discs

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P006: ammonia nitriding furnaces	OAC rule 3745-31-05(A)(3) (PTI #13-1746a issued/effective March 30, 1988)	Ammonia emissions shall not exceed 14 tons per year. See A.I.2.a.

2. Additional Terms and Conditions

2.a Pursuant to the Additional Special Terms and Conditions in the Permit to Install 13-1746, the exhaust stack(s) for the ammonia base nitriding electric furnaces (P006) shall be, at a minimum, 40 feet in height above ground. Should a nuisance problem occur as a result of the emissions from this emissions unit, the Director (the appropriate Ohio EPA District Office or local air agency) may require that the stack height be increased.

II. Operational Restrictions

1. The permittee shall maintain the practice of introducing nitrogen gas directly into the furnaces during the cool/purge period in order to lower ammonia emissions.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following annual records for this emissions unit:

a. The actual ammonia consumption, in tons.

b. The predicted process ammonia need, in tons.

IV. Reporting Requirements

1. The permittee shall submit annual reports which specify the total emissions of ammonia from this emissions unit for the previous calendar year. The reports shall include the calculations for the annual emissions and shall be submitted by January 31 of each year.

V. Testing Requirements

1. Emission Limitation:
Ammonia emissions shall not exceed 14 tons per year.

Applicable Compliance Method:
Compliance shall be demonstrated by subtracting the predicted process ammonia need from the actual ammonia consumption.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Commercial Finishing Line (P007)

Activity Description: Various Sanders, Grinders and Groovers used for Machining Sintered Metallic Friction Materials

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P007: commercial brake & clutch parts finishing line - sanding, grinding & machining equipment controlled by baghouses	OAC rule 3745-31-05(A)(3) (PTI #13-01746 modification issued/effective 11/28/2000)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B) and 3745-17-07(A). Particulate emissions (PE) shall not exceed 6.53 TPY.
	OAC rule 3745-17-11(B)	1.49 lbs PE/hr
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

2.a All PE from this emissions unit shall be vented to the baghouses.

II. Operational Restrictions

1. Except as provided below, the pressure drops across the baghouses shall be maintained within the following ranges while the emissions unit is in operation:

2 to 4 inches of water column for baghouse #1; and
0.5 to 3 inches of water column for baghouse #2.

This operational restriction shall not apply during the first 3 days of operation following any bag changes.

During these periods of time in which the operational restriction does not apply, the permittee shall perform daily visible emission checks as specified in Section A.III.2.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across each baghouse while the emissions unit is in operation. 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 each baghouse on a daily basis except as specified in A.II.1.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Director (the appropriate Ohio EPA District Office or local air agency), compliance with the mass emission limitation and visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using US EPA - approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitation.

2. Following replacement of bags in a baghouse and for the period of time indicated in section A.II.1, 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 that baghouse. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when pressure drop monitoring is required and during which the pressure drop(s) across the baghouse(s) did not comply with the allowable range specified above.

2. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

3. The permittee shall submit semiannual written reports when daily visible emission checks are required that (a) identify all days during which any visible particulate emissions were observed from either or both of the baghouses serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Emission Limitation:
20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

2. Emission Limitations:
PE shall not exceed 1.49 lbs/hr.

Applicable Compliance Method:
If required, compliance with this emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

V. Testing Requirements (continued)

3. Emission Limitation:
PE shall not exceed 6.53 TPY.

Applicable Compliance Method:
Compliance with the tons per year limitation shall be assumed as long as compliance is maintained with the lbs/hr limit. (The annual limitation was established by multiplying the hourly emission limitation by 8760 hours/year, and then dividing by 2000 pounds/ton.)

VI. Miscellaneous Requirements

1. The terms and conditions of the original Permit to Install No. 13-1746, issued on March 30, 1988 for this emissions unit, were modified, and the modified permit was issued as Permit to Install No. 13-01746 on November 28, 2000.

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Commercial Molding Line (P008)

Activity Description: Various Presses for Molding Powdered Metal Parts W/ Portable Roller Coaters for Applying Graphite

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P008: commercial molding press line with 8 hydraulic presses for molding powdered metal parts, and a series of portable roller coaters at each press for applying graphite to the molded part, all controlled by a baghouse	OAC rule 3745-31-05(A)(3) (PTI #13-1746c issued/effective March 30, 1988)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and 3745-21-09(U)(2)(e)(ii). Particulate emissions (PE) shall not exceed 0.01 gr/dscf, 1.18 lbs/hr, and 5.18 TPY.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-21-09(U)(2)(e)(ii)	The maximum daily coating usage for this emissions unit shall not exceed 3 gallons. (See A.I.2.c.)

2. Additional Terms and Conditions

2.a Although the requirements of OAC rule 3745-21-09(U) allow for an exemption from applicable VOC content limitations, the daily usage exemption allowed in accordance with OAC rule 3745-21-09(U)(2)(e)(ii) is not part of the federally-approved SIP (for the Cleveland/Akron ozone area). The rule has been revised to reflect an exemption level (3 gallons per day) that is acceptable to USEPA. Therefore, the 3 gallons per day usage restriction shall apply as the exemption level while OAC rule 3745-21-09(U) is being approved by USEPA, as well as after USEPA approval.

2.b All of the PE from this emissions unit shall be vented to the baghouse.

2.c The maximum allowable daily coating usage of 3 gallons is greater than the emissions unit's maximum potential coating usage. Therefore, no additional monitoring, record keeping, reporting, and/or testing requirements are necessary to ensure compliance with this limitation.

II. Operational Restrictions

1. Except as provided below, the pressure drop across the baghouse shall be maintained within the range of 0.5 to 3.0 inches of water column while the emissions unit is in operation.

This operational restriction shall not apply during the first 3 days of operation following any bag changes.

During these periods of time in which the operational restriction does not apply, the permittee shall perform daily visible emission checks as specified in Section A.III.2.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 except as specified in A.II.1.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Director (the appropriate Ohio EPA District Office or local air agency), compliance with the mass emission limitation and visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using US EPA - approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitation.

2. Following replacement of bags in the baghouse and for the period of time indicated in section A.II.1, 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 baghouse 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 eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when pressure drop monitoring is required and during which the pressure drop across the baghouse did not comply with the allowable range specified above.

2. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

3. The permittee shall submit semiannual written reports when daily visible emission checks are required that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Emission Limitation:
20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

V. Testing Requirements (continued)

2. Emission Limitations:
PE shall not exceed 0.01 gr/dscf.
PE shall not exceed 1.18 lbs/hr.

Applicable Compliance Method:
If required, compliance with this emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

3. Emission Limitation:
PE shall not exceed 5.18 TPY.

Applicable Compliance Method:
Compliance with the tons per year limitation shall be assumed as long as compliance is maintained with the lbs/hr limit. (The annual limitation was established by multiplying the hourly emission limitation by 8760 hours/year, and then dividing by 2000 pounds/ton).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 24" Sintering Furnace #7 (P012)

Activity Description: 24" Sintering Furnace #7

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P012: natural gas-fired 24-inch wide continuous sintering furnace #7 using an exalene gas atmosphere	OAC rule 3745-31-05(A)(3) (PTI #13-2664b issued/effective June 3, 1993)	Visible particulate emissions from any stack shall not exceed 5% opacity as a six-minute average, except as provided by rule. Carbon monoxide (CO) emissions shall not exceed 9.59 lbs/hr. (See Additional Term and Condition A.I.2.a.) There shall be no objectionable odors from this emissions unit. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B).
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 lb/hr.
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The hourly emission limitation for CO is based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with this emissions limitation.

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

2. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

V. Testing Requirements

1. Emission Limitation:
PE shall not exceed 0.551 lb/hr.

Applicable Compliance Method:
If required, compliance with this emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

2. Emission Limitation:
5% opacity as a six-minute average

Applicable Compliance Method:
If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

3. Emission Limitation:
CO emissions shall not exceed 9.59 lbs/hr.

Applicable Compliance Method:
If required, compliance with this emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 10.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: HDT Manufacturing Line (P013)

Activity Description: HDT (Graphitic) Friction Disc Manufacturing Line Consisting of Various Mixing, Molding, Sanding and Grinding Equipment

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P013: HDT (graphitic) friction disc manufacturing line consisting of various mixing, molding, sanding and grinding equipment and controlled by a baghouse	OAC rule 3745-31-05(A)(3) (PTI #13-3065 issued/effective June 5, 1996)	Particulate emissions (PE) shall not exceed 0.96 lb/hr. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

2.a All PE from this emissions unit shall be vented to the baghouse.

II. Operational Restrictions

1. Except as provided below, the pressure drop across the baghouse shall be maintained within the range of 0.5 to 3.0 inches of water column while the emissions unit is in operation.

This operational restriction shall not apply during the first 3 days of operation following any bag changes.

During these periods of time in which the operational restriction does not apply, the permittee shall perform daily visible emission checks as specified in Section A.III.2.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 except as specified in A.II.1.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Director (the appropriate Ohio EPA District Office or local air agency), compliance with the mass emission limitation and visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using US EPA - approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitation.

2. Following replacement of bags in the baghouse and for the period of time indicated in section A.II.1, 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 baghouse 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 eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when pressure drop monitoring is required and during which the pressure drop across the baghouse did not comply with the allowable range specified above.

2. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

3. The permittee shall submit semiannual written reports when daily visible emission checks are required that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Emission Limitation:
20% opacity as a six-minute average

Applicable Compliance Method:
If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

2. Emission Limitation:
0.96 lb/hr particulate emissions at baghouse stack exit for P013 alone

Applicable Compliance Method:
If required, compliance with this emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Grit Blast Machine (P015)

Activity Description: Grit Blast Machine

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P015: grit blast machine to blast metal discs and controlled by a baghouse	OAC rule 3745-31-05(A)(3) (PTI #13-3095 modification issued 11/28/2000)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B). Particulate emissions (PE) shall not exceed 14.8 TPY Visible particulate emissions from any stack shall not exceed 5% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	PE shall not exceed 3.38 lbs/hr.
	OAC rule 3745-17-07(A)	The visible emission limitation in this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a All PE from this emissions unit shall be vented to the baghouse.

II. Operational Restrictions

1. Except as provided below, the pressure drop across the baghouse shall be maintained within the range of 1.5 to 6.0 inches of water column while the emissions unit is in operation.

This operational restriction shall not apply during the first 3 days of operation following any bag changes.

During these periods of time in which the operational restriction does not apply, the permittee shall perform daily visible emission checks as specified in Section A.III.2.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 except as specified in A.II.1.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Director (the appropriate Ohio EPA District Office or local air agency), compliance with the mass emission limitation and visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using US EPA - approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitation.

2. Following replacement of bags in the baghouse and for the period of time indicated in section A.II.1, 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 baghouse 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 eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when pressure drop monitoring is required and during which the pressure drop across the baghouse did not comply with the allowable range specified above.

2. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

3. The permittee shall submit semiannual written reports when daily visible emission checks are required that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Emission Limitation:
5% opacity as a six-minute average

Applicable Compliance Method:
If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

2. Emission Limitation:
3.38 lbs PE/hr

Applicable Compliance Method:
If required, compliance with this emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

V. Testing Requirements (continued)

3. Emission Limitation:
PE shall not exceed 14.8 TPY.

Applicable Compliance Method:
Compliance with the tons per year limitation shall be assumed as long as compliance is maintained with the lbs/hr limit. (The annual emission limitation was developed by multiplying the allowable hourly emission limitation by 8760 hours/year and dividing by 2000 pounds/ton.)

VI. Miscellaneous Requirements

1. The terms and conditions of the original Permit to Install No. 13-3095, issued on August 28, 1996 for emissions unit P015, were modified, and the modified permit was issued as Permit to Install No. 13-03095 on November 28, 2000.

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 5 electric furnaces #1 to #5 (P016)

Activity Description: 5 electric furnaces using nitrogen, disassociated ammonia and exothermic gas atmosphere for sintering. Each furnace has an integral flame curtain.

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P016: five (5) electrically heated continuous belt furnaces using nitrogen, dissociated ammonia, and exothermic gas atmosphere for sintering metallic friction materials, with each furnace having an integral flame curtain	OAC rule 3745-31-05(A)(3) (PTI #13-3143 modification issued on November 28, 2000)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B) and 3747-17-07(A). Particulate emissions (PE) shall not exceed 3.29 TPY. Carbon monoxide (CO) emissions shall not exceed 2.88 lbs/hr and 12.61 TPY. (See Additional Term and Condition 2.a).
	OAC rule 3745-17-11(B)	PE shall not exceed 0.75 lb/hr.
	OAC rule 3747-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

2.a The hourly emission limitation for CO is based on the emissions unit's potential to emit. Therefore, no additional monitoring, recordkeeping and/or reporting requirements are necessary to ensure compliance with this emissions limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks 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 eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Emission Limitation:
PE: 0.75 lb/hr

Applicable Compliance Method:
If required, compliance with this emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

2. Emission Limitation:
PE shall not exceed 3.29 TPY.

Applicable Compliance Method:
Compliance with the tons per year limitation shall be assumed as long as compliance is maintained with the lbs/hr limit.

3. Emission Limitation:
20% opacity as a 6-minute average

Applicable Compliance Method:
If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

4. Emission Limitation:
2.88 lbs CO/hr

Applicable Compliance Method:
If required, compliance with this emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 10.

5. Emission Limitation
CO shall not exceed 12.61 TPY.

Applicable Compliance Method:
Compliance with the tons per year limitation shall be assumed as long as compliance is maintained with the lbs/hr limit. (The annual emission limitation was developed by multiplying the allowable hourly emission limitation by 8760 hours/year and dividing by 2000 pounds/ton.)

VI. Miscellaneous Requirements

1. The terms and conditions of the original Permit to Install No. 13-3143, issued on November 6, 1996 for emissions unit P015, were modified, and the modified permit was issued as Permit to Install No. 13-03143 on November 28, 2000.

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Metal Finishing Line (P017)

Activity Description: Metal Finishing Line Using Speed Sanders For Sanding Metal Discs to Specified Micro Finish

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P017: metal finishing line using speed sanders for sanding metal discs and controlled by a baghouse	OAC rule 3745-31-05(A)(3) (PTI #13-3145 issued/effective October 2, 1996)	Visible particulate emissions from any stack shall not exceed 5% opacity as a six-minute average, except as provided by rule. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B).
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 2.4 lbs/hr.
	OAC rule 3745-17-07(A)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a All PE from this emissions unit shall be vented to the baghouse.

II. Operational Restrictions

1. Except as provided below, the pressure drop across the baghouse shall be maintained within the range of 2.0 to 8.0 inches of water column while the emissions unit is in operation.

This operational restriction shall not apply during the first 3 days of operation following any bag changes.

During these periods of time in which the operational restriction does not apply, the permittee shall perform daily visible emission checks as specified in Section A.III.2.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. 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 except as specified in A.II.1.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Director (the appropriate Ohio EPA District Office or local air agency), compliance with the mass emission limitation and visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using US EPA - approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitation.

2. Following replacement of bags in the baghouse and for the period of time indicated in section A.II.1, 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 baghouse 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 eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when pressure drop monitoring is required and during which the pressure drop across the baghouse did not comply with the allowable range specified above.

2. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

3. The permittee shall submit semiannual written reports when daily visible emission checks are required that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Emission Limitation:
2.4 lbs PE/hr

Applicable Compliance Method:
If required, compliance with this emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

2. Emission Limitation:
5% opacity as a six-minute average

Applicable Compliance Method:
If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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