

Facility ID: 0243081131 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

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

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

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Facility ID: 0243081131 Emissions Unit ID: P002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
500 ton Ajax press & preheat furnace, with Smog Hog ESP	OAC Rule 3745-17-11(B)(1)	0.551 lb or particulate emissions (PE)/hr
	OAC Rule 3745-17-07(A)(1)	Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.
	OAC Rule 3745-21-07(G)(2)	This emissions unit does not employ, apply, evaporate or dry any photochemically reactive material (PRM), or any substance containing such PRM. Therefore, there are no applicable emission limitations from this rule.

2. **Additional Terms and Conditions**
 - (a) The permittee shall operate the Smog Hog ESP at all times while the emissions unit is in operation.

B. Operational Restrictions

1. The permittee shall clean each pass (each containing four cells) on the Smog Hog ESP every other day during actual operating hours.
2. The permittee shall not employ any lubricant or other material in this emissions unit that is a PRM. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain a log of all times that the Smog Hog ESP was cleaned.
2. The permittee shall maintain documentation on whether or not each lubricant employed in this emissions unit is a PRM.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports identifying all times that the Smog Hog ESP was required to be cleaned as specified above and the cleaning was not performed.
2. The permittee shall notify the Northeast District Office of Ohio EPA in writing identifying each day during which any lubricant that was photochemically reactive was employed in this emissions unit. This report shall be submitted within 30 days following the date of noncompliance, and shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 Emission Limitation:
 0.551 lb of PE/hr

 Applicable Compliance Method:

Compliance with the above hourly PE limitation shall be determined by the following equation, or, if required, by testing using Method 5 of 40 CFR, Part 60, Appendix A:

$$E = N \times D \times P \times (1 - CE)$$

where:

E = hourly PE rate, in lbs/hr;
 N = number of gallons of lubricant employed per hour, in gal/hr;
 D = density of lubricant, lbs/gal;
 P = percent oil in lubricant; and
 CE = fractional control efficiency of ESP.

Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the above visible PE limitation shall be determined by the method specified in OAC Rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

1. None

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Facility ID: 0243081131 Emissions Unit ID: P003 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1,000 ton Ajax press & preheat furnace, with Smog Hog ESP	OAC Rule 3745-17-11(B)(1)	0.551 lb or particulate emissions (PE)/hr
	OAC Rule 3745-17-07(A)(1)	Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.
	OAC Rule 3745-21-07(G)(2)	This emissions unit does not employ, apply, evaporate or dry any photochemically reactive material (PRM), or any substance containing such PRM. Therefore, there are no applicable emission limitations from this rule.

2. **Additional Terms and Conditions**
 - (a) The permittee shall operate the Smog Hog ESP at all times while the emissions unit is in operation.

B. Operational Restrictions

1. The permittee shall clean each pass (each containing four cells) on the Smog Hog ESP every other day during actual operating hours.
2. The permittee shall not employ any lubricant or other material in this emissions unit that is a PRM. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain a log of all times that the Smog Hog ESP was cleaned.
2. The permittee shall maintain documentation on whether or not each lubricant employed in this emissions unit is a PRM.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports identifying all times that the Smog Hog ESP was required to be cleaned as specified above and the cleaning was not performed.
2. The permittee shall notify the Northeast District Office of Ohio EPA in writing identifying each day during which any lubricant that was photochemically reactive was employed in this emissions unit. This report shall be submitted within 30 days following the date of noncompliance, and shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
0.551 lb of PE/hr

Applicable Compliance Method:
Compliance with the above hourly PE limitation shall be determined by the following equation, or, if required, by testing using Method 5 of 40 CFR, Part 60, Appendix A:

$$E = N \times D \times P \times (1 - CE)$$

where:

E = hourly PE rate, in lbs/hr;
N = number of gallons of lubricant employed per hour, in gal/hr;
D = density of lubricant, lbs/gal;
P = percent oil in lubricant; and
CE = fractional control efficiency of ESP.

Emission Limitation:
Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the above visible PE limitation shall be determined by the method specified in OAC Rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

1. None

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Facility ID: 0243081131 Emissions Unit ID: P006 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2,000 ton Ajax extrusion press & preheat furnace, with Smog Hog ESP	OAC Rule 3745-31-05(A)(3) (PTI 02-8428)	0.13 lb of particulate emissions (PE)/hr
	OAC Rule 3745-17-11(B)(1)	The PE limitation established in this rule is less stringent than the one established pursuant to OAC Rule 3745-31-05(A)(3).
	OAC Rule 3745-17-07(A)(1)	Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.
	OAC Rule 3745-21-07(G)(2)	This emissions unit does not employ, apply, evaporate

or dry any photochemically reactive material (PRM), or any substance containing such PRM. Therefore, there are no applicable emission limitations from this rule.

2. **Additional Terms and Conditions**

- (a) The permittee shall operate the Smog Hog ESP at all times while the emissions unit is in operation.

B. **Operational Restrictions**

1. The permittee shall clean each pass (each containing four cells) on the Smog Hog ESP every other day during actual operating hours.
2. The permittee shall not employ any lubricant or other material in this emissions unit that is a PRM. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain a log of all times that the Smog Hog ESP was cleaned.
2. The permittee shall maintain documentation on whether or not each lubricant employed in this emissions unit is a PRM.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports identifying all times that the Smog Hog ESP was required to be cleaned as specified above and the cleaning was not performed.
2. The permittee shall notify the Northeast District Office of Ohio EPA in writing identifying each day during which any lubricant that was photochemically reactive was employed in this emissions unit. This report shall be submitted within 30 days following the date of noncompliance, and shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day.

E. **Testing Requirements**

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:
0.13 lb of PE/hr

Applicable Compliance Method:

Compliance with the above hourly PE limitation shall be determined by the following equation, or, if required, by testing using Method 5 of 40 CFR, Part 60, Appendix A:

$$E = N \times D \times P \times (1 - CE)$$

where:

E = hourly PE rate, in lbs/hr;
N = number of gallons of lubricant employed per hour, in gal/hr;
D = density of lubricant, lbs/gal;
P = percent oil in lubricant; and
CE = fractional control efficiency of ESP.

Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the above visible PE limitation shall be determined by the method specified in OAC Rule 3745-17-03(B)(1).

F. **Miscellaneous Requirements**

1. None