



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

10/21/2010

J.P. OBERLIN
I. SCHUMANN & COMPANY
22500 ALEXANDER RD.
OAKWOOD VILLAGE, OH 44146

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318402645
Permit Number: P0095703
Permit Type: Renewal
County: Cuyahoga

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Plain Dealer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
CDAQ; Pennsylvania; Canada



Permit Strategy Write-Up

1. Check all that apply:

- Synthetic Minor Determination (to avoid Title V)
- Netting Determination

2. Source Description:

I. Schumann is a brass and bronze recycling facility. They use 2 electric induction furnaces and 5 rotary reverberatory furnaces to melt brass and bronze scrap to shape into ingots.

3. Facility Emissions and Attainment Status:

Facility actual particulate emissions reported as approximately 29 tons for 2008. The actual emissions for 2009 are estimated to be 42.45 TPY using more specific production information provided.

The potential to emit particulate emissions, for both stack and fugitive emissions, operating 8760 hours per year exceeds the Title V major source threshold of 100 tons/yr based on the federally enforceable allowable limit from MACT Subpart TTTTTT.

The proposed facility allowable for P003-P010 combined is 92.29 TPY as a 12-month rolling limit for stack and fugitive particulate combined.

Cuyahoga County is in non-attainment for PM_{2.5}

4. Source Emissions:

The facility has requested a federally enforceable operating restriction on the annual hours of operation. The facility will be restricted to operating 7,488 hours per rolling, 12-month period. The emissions units at this facility are vented to four separate baghouses as follows:

- P005, P006, P009, & P010 are vented to Baghouse #1
- P003, P006, & P008 are vented to Baghouse #2
- P003, P004, P005, P006, P007, and P008 are vented to Baghouse #3
- P004, P007, & P008 are vented to Baghouse #4

The facility requested annual operating restrictions to keep emissions below 100 tons/yr. The lb/hr below is what the facility anticipates would be the max lb/hr emissions based on scaling up stack test results.

	lb/hr	Allowable hours/yr	TPY stack	TPY fugitive	Total TPY
P003	4.67	7488	17.48	1.68	19.16
P004	2.98	7488	11.16	0.37	11.53
P005	3.00	7488	11.23	1.61	12.84
P006	4.76	7488	17.82	3.01	20.83
P007	0.30	7488	1.12	0.40	1.52
P008	5.07	7488	18.98	3.23	22.21
P009	0.54	7488	2.02	0.08	2.10
P010	0.54	7488	2.02	0.08	2.10
Total					92.29

Note: There are no De Minimis or 31-03 exempt emissions units at this facility.

5. Conclusion:

The potential to emit particulates for the I. Schumann facility has been restricted below the Title V threshold with the federally enforceable annual operating restriction of 7,488 hours per rolling, 12-month period for the facility coupled with the pound/hour stack test results. Provided that I. Schumann maintains compliance with the terms and conditions for P003-P010, this facility will not be subject to Title V permitting. Monthly record keeping of hours and tons of production is required.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary for P0095703 (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year (for EUs P003 – P006 and P008)</u>
PE	86.57

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
I. SCHUMANN & COMPANY

Issue Date: 10/21/2010

Permit Number: P0095703

Permit Type: Renewal

Permit Description: This is an intitial FEPTIO for 5 reverberatory furnaces for melting brass and bronze. P008 was issued PTI 13-639 on 6/6/1980. P003-P006 and P008 have expired PTOs issued in 1992.

Facility ID: 1318402645

Facility Location: I. SCHUMANN & COMPANY
22500 ALEXANDER RD,
OAKWOOD VILLAGE, OH 44146

Facility Description: Secondary Smelting and Alloying of Aluminum

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to David Hearne at Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114 or (216)664-2297. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
I. SCHUMANN & COMPANY**

Facility ID: 1318402645
Permit Number: P0095703
Permit Type: Renewal
Issued: 10/21/2010
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
I. SCHUMANN & COMPANY

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Authorization

Facility ID: 1318402645

Application Number(s): A0027289

Permit Number: P0095703

Permit Description: This is an initial FEPTIO for 5 reverberatory furnaces for melting brass and bronze. P008 was issued PTI 13-639 on 6/6/1980. P003-P006 and P008 have expired PTOs issued in 1992.

Permit Type: Renewal

Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 10/21/2010

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

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

This document constitutes issuance to:

I. SCHUMANN & COMPANY
22500 ALEXANDER RD
OAKWOOD VILLAGE, OH 44146

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

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

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0095703

Permit Description: This is an intitial FEPTIO for 5 reverberatory furnaces for melting brass and bronze. P008 was issued PTI 13-639 on 6/6/1980. P003-P006 and P008 have expired PTOs issued in 1992.

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

- Emissions Unit ID: P003**
 Company Equipment ID: Rotary Melting Furnace No. 3
 Superseded Permit Number: P0061131
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: P004**
 Company Equipment ID: Rotary Melting Furnace No. 4
 Superseded Permit Number: P0061132
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: P005**
 Company Equipment ID: Rotary Melting Furnace No. 5
 Superseded Permit Number: P0061133
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: P006**
 Company Equipment ID: Rotary Melting Furnace No. 6
 Superseded Permit Number: P0061134
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: P008**
 Company Equipment ID: Rotary Melting Furnace No. 7
 Superseded Permit Number: P0061136
 General Permit Category and Type: Not Applicable



A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

while the emissions unit was in operation, for at least five years from the date the record was generated.

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions



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

a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(1) c)(1), c)(2)a., d)(1), e)(1), f)(1) and g)(1).

c) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a	OAC rule 3745-31-05(D)(1)(b) Synthetic Minor to avoid Title V	See c)(2)

(2) Additional Terms and Conditions

a. The particulate emissions from this facility shall not exceed 92.29 TPY, based on a rolling, 12-month summation.

b. The facility-wide emission limit shall include emissions from the following units: P003, P004, P005, P006, P007, P008, P009 and P010.

d) Operational Restrictions

(1) The maximum annual operating hours for each emissions unit shall not exceed 7488, based upon a rolling, 12-month summation of the operating hours.

e) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for each emissions unit:

a. the operating hours for each month; and



- b. the rolling, 12-month summation of the operating hours.
 - f) Reporting Requirements
 - (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All exceedances of the rolling, 12-month restriction on the hours of operation.
 - g) Testing Requirements
 - (1) Compliance with c)(2)a. can be demonstrated through yearly emissions reporting of actual emissions.
2. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subpart M, New Source Performance Standards (NSPS) for Secondary Brass and Bronze Production Plants: P008. The complete NSPS requirements, including the NSPS Subpart A General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Cleveland Division of Air Quality (Cleveland DAQ).
- The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart M. The permittee shall also comply with all applicable requirements of 40 CFR Part 60, Subpart A General Provisions. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 60, Subpart A, and Subpart M.
3. The Ohio EPA has determined that this facility may be subject to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the areas source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.

C. Emissions Unit Terms and Conditions



1. P003, Rotary Melting Furnace No. 3

Operations, Property and/or Equipment Description:

Rotary Melting Furnace No. 3

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)(1)(b) Synthetic Minor to avoid Title V	Particulate emissions (PE) from the baghouse stack(s) serving this emissions unit shall not exceed 17.48 tons per rolling, 12-months. Fugitive particulate matter shall not exceed 1.68 tons per rolling, 12-months. See b)(2)a. and c)(1) below.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a three-minute average, except as provided by rule.



Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)	The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust. See b)(2)b. below.
e.	OAC rule 3745-17-11(A)	Particulate emissions shall not exceed 5.62 lbs/hr.

(2) Additional Terms and Conditions

- a. For the purpose of this restriction, all particulate emissions are assumed to be equivalent to or greater than PM_{2.5} and PM₁₀ emissions. As better test methods are developed to speciate PM_{2.5}, these numbers may change.
- b. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirement:
 - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

c) Operational Restrictions

- (1) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the hours of operation, upon issuance of this permit. The maximum annual operating hours for this emission unit shall not exceed 7,488, based upon a rolling, 12-month summation of the operating hours.
- (2) Slag skimmings shall be air cooled indoors adequately before being placed outdoors.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month;
 - b. the tons of production for each month;
 - c. the rolling, 12-month summation of the operating hours; and
 - d. the rolling, 12-month summation of tons of production.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across baghouse #2 and baghouse #3 has been established to be not less than 2 inches of water.

- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a once per shift basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

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

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

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

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate

for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions of fugitive dust 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 location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit;
 - ii. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range; and
 - iii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse.

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by Cleveland DAQ.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(4) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

- b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
PE shall not exceed 17.48 tons per rolling, 12-months

Applicable Compliance Method:

Compliance with this emission limit may be based on an emission factor of 1.39 lbs/hour of filterable particulate emissions which was established through stack testing of the source. These stack tests were performed on September 16, 2009. The emission factor may be used to demonstrate compliance with the annual allowable emission rate by multiplying the 1.39 lbs/hr emission factor by actual hours of operation per rolling, 12-months and dividing by 2000 lbs/ton. The lb/hr emission factor shall be replaced with the most current stack test results if additional testing occurs.

- b. Emission Limitation:
Fugitive PM emissions shall not exceed 1.68 tons per rolling, 12-months

Applicable Compliance Method:

Compliance shall be shown by using an engineering emission factor of 0.43 lbs fugitive PM per ton of metal processed multiplied by the tons of metal processed per rolling 12-months and divided by 2000 lbs/ton.

- c. Emission Limitation:
Visible particulate emissions from the baghouse stacks shall not exceed 20% opacity as a six-minute average, except as specified by rule; and visible emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

- d. Emission Limitation:
Particulate emissions shall not exceed 5.62 lbs/hr

Applicable Compliance Method:

Compliance shall be determined using Methods 1 through 5 in accordance with 40 CFR, Part 60, Appendix A.

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 12 months prior to permit renewal.

- b. The emission testing shall be conducted on baghouses #2 and #3 to demonstrate compliance with the allowable mass emission rate(s) for particulates and opacity in the appropriate averaging period(s).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Particulates: Methods 1-5, 40 CFR Part 60, Appendix A

Opacity: Method 9, 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).
- f. Personnel from the Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

g) **Miscellaneous Requirements**

- (1) This emissions unit was installed in 1968.



2. P004, Rotary Melting Furnace No. 4

Operations, Property and/or Equipment Description:

Rotary Melting Furnace No. 4

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)(1)(b) Synthetic Minor to avoid Title V	Particulate emissions (PE) from the baghouse stack(s) serving this emissions unit shall not exceed 11.16 tons per rolling, 12-months. Fugitive particulate matter shall not exceed 0.37 tons per rolling, 12-months. See b)(2)a. and c)(1) below.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a three-minute average, except as provided by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)	The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust. See b)(2)b. below.
e.	OAC rule 3745-17-11(A)	Particulate emissions shall not exceed 4.76 lbs/hr.

(2) Additional Terms and Conditions

- a. For the purpose of this restriction, all particulate emissions are assumed to be equivalent to or greater than PM_{2.5} and PM₁₀ emissions. As better test methods are developed to speciate PM_{2.5}, these numbers may change.
- b. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirement:
 - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

c) Operational Restrictions

- (1) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the hours of operation, upon issuance of this permit. The maximum annual operating hours for this emission unit shall not exceed 7,488, based upon a rolling, 12-month summation of the operating hours.
- (2) Slag skimmings shall be air cooled indoors adequately before being placed outdoors.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month;
 - b. the tons of production for each month;
 - c. the rolling, 12-month summation of the operating hours; and
 - d. the rolling, 12-month summation of tons of production.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across baghouse #3 has been established to

be not less than 2 inches of water; the acceptable pressure drop across baghouse #4 has been established to be not less than 4 inches of water.

- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a once per shift basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

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

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

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

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by

the Cleveland Division of Air Quality (DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions of fugitive dust 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 location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit;
 - ii. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range; and

- iii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by Cleveland DAQ.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(4) above:

- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
PE shall not exceed 11.16 tons per rolling, 12-months

Applicable Compliance Method:
Compliance with this emission limit may be based on an emission factor of 1.30 lbs/hour of filterable particulate emissions which was established through stack testing of the source. These stack tests were performed on May 11, 2005. The emission factor may be used to demonstrate compliance with the annual allowable emission rate by multiplying the 1.30 lbs/hr emission factor by actual hours of operation per rolling, 12-months and dividing by 2000 lbs/ton. The lb/hr emission factor shall be replaced with the most current stack test results if additional testing occurs..
 - b. Emission Limitation:
Fugitive PM emissions shall not exceed 0.37 tons per rolling, 12-months

Applicable Compliance Method:
Compliance shall be shown by using an engineering emission factor of 0.43 lbs fugitive PM per ton of metal processed multiplied by the tons of metal processed per rolling 12-months and divided by 2000 lbs/ton.
 - c. Emission Limitation:
Visible particulate emissions from the baghouse stacks shall not exceed 20% opacity as a six-minute average, except as specified by rule; and visible emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:
Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.
 - d. Emission Limitation:
Particulate emissions shall not exceed 4.76 lbs/hr

Applicable Compliance Method:
Compliance shall be determined using Methods 1 through 5 in accordance with 40 CFR, Part 60, Appendix A.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 12 months prior to permit renewal.
- b. The emission testing shall be conducted on baghouses #3 and #4 to demonstrate compliance with the allowable mass emission rate(s) for particulates, opacity, and lead emissions in the appropriate averaging period(s).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Particulates: Methods 1-5, 40 CFR Part 60, Appendix A

Opacity: Method 9, 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).
- f. Personnel from the Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

g) Miscellaneous Requirements

(1) This emissions unit was installed in 1968.



3. P005, Rotary Melting Furnace No. 5

Operations, Property and/or Equipment Description:

Rotary Melting Furnace No. 5

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)(1)(b) Synthetic Minor to avoid Title V	Particulate emissions (PE) from the baghouse stack(s) serving this emissions unit shall not exceed 11.23 tons per rolling, 12-months. Fugitive particulate matter shall not exceed 1.61 tons per rolling, 12-months. See b)(2)a. and c)(1) below.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a three-minute average, except as provided by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)	The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust. See b)(2)b. below.
e.	OAC rule 3745-17-11(A)	Particulate emissions shall not exceed 5.04 lbs/hr.

(2) Additional Terms and Conditions

- a. For the purpose of this restriction, all particulate emissions are assumed to be equivalent to or greater than PM_{2.5} and PM₁₀ emissions. As better test methods are developed to speciate PM_{2.5}, these numbers may change.
- b. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirement:
 - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

c) Operational Restrictions

- (1) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the hours of operation, upon issuance of this permit. The maximum annual operating hours for this emission unit shall not exceed 7,488, based upon a rolling, 12-month summation of the operating hours.
- (2) Slag skimmings shall be air cooled indoors adequately before being placed outdoors.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month;
 - b. the tons of production for each month;
 - c. the rolling, 12-month summation of the operating hours; and
 - d. the rolling, 12-month summation of tons of production.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across baghouse #1 has been established to be not less than 3 inches of water; the acceptable pressure drop across baghouse #3 has been established to be not less than 2 inches of water.

- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a once per shift basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

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

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

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

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate

for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions of fugitive dust 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 location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit;
 - ii. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range; and
 - iii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse.

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by Cleveland DAQ.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(4) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

- b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
PE shall not exceed 11.23 tons per rolling, 12-months

Applicable Compliance Method:
Compliance with this emission limit may be based on an emission factor of 2.00 lbs/hour of filterable particulate emissions which was established through stack testing of the source. These stack tests were performed on March 27, 2009 and September 16, 2009. The emission factor may be used to demonstrate compliance with the annual allowable emission rate by multiplying the 2.00 lbs/hr emission factor by actual hours of operation per rolling, 12-months and dividing by 2000 lbs/ton. The lb/hr emission factor shall be replaced with the most current stack test results if additional testing occurs.
 - b. Emission Limitation:
Fugitive PM emissions shall not exceed 1.61 tons per rolling, 12-months

Applicable Compliance Method:
Compliance shall be shown by using an engineering emission factor of 0.43 lbs fugitive PM per ton of metal processed multiplied by the tons of metal processed per rolling 12-months and divided by 2000 lbs/ton.
 - c. Emission Limitation:
Visible particulate emissions from the baghouse stacks shall not exceed 20% opacity as a six-minute average, except as specified by rule; and visible emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:
Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.
 - d. Emission Limitation:
Particulate emissions shall not exceed 5.04 lbs/hr

Applicable Compliance Method:
Compliance shall be determined using Methods 1 through 5 in accordance with 40 CFR, Part 60, Appendix A.
 - (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 12 months prior to permit renewal.

- b. The emission testing shall be conducted on baghouses #1 and #3 to demonstrate compliance with the allowable mass emission rate(s) for particulates, opacity, and lead emissions in the appropriate averaging period(s).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Particulates: Methods 1-5, 40 CFR Part 60, Appendix A

Opacity: Method 9, 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).
- f. Personnel from the Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

g) **Miscellaneous Requirements**

- (1) This emissions unit was installed in 1968.



4. P006, Rotary Melting Furnace No. 6

Operations, Property and/or Equipment Description:

Rotary Melting Furnace No. 6

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)(1)(b) Synthetic Minor to avoid Title V	Particulate emissions (PE) from the baghouse stack(s) serving this emissions unit shall not exceed 17.82 tons per rolling, 12-months. Fugitive particulate matter shall not exceed 3.01 tons per rolling, 12-months. See b)(2)a. and c)(1) below.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a three-minute average, except as provided by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)	The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust. See b)(2)b. below.
e.	OAC rule 3745-17-11(A)	Particulate emissions shall not exceed 7.83 lbs/hr.

(2) Additional Terms and Conditions

- a. For the purpose of this restriction, all particulate emissions are assumed to be equivalent to or greater than PM_{2.5} and PM₁₀ emissions. As better test methods are developed to speciate PM_{2.5}, these numbers may change.
- b. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirement:
 - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

c) Operational Restrictions

- (1) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the hours of operation, upon issuance of this permit. The maximum annual operating hours for this emission unit shall not exceed 7,488, based upon a rolling, 12-month summation of the operating hours.
- (2) Slag skimmings shall be air cooled indoors adequately before being placed outdoors.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. The operating hours for each month;
 - b. the tons of production for each month;
 - c. the rolling, 12-month summation of the operating hours; and
 - d. the rolling, 12-month summation of tons of production.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across baghouse #1 has been established to be not less than 3 inches of water; the acceptable pressure drop across baghouse #2 and baghouse #3 has been established to be not less than 2 inches of water.

- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a once per shift basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

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

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

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

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (DAQ). The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate

for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions of fugitive dust 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 location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit;
 - ii. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range; and
 - iii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse.

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by Cleveland DAQ.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(4) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

- b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
PE shall not exceed 17.82 tons per rolling, 12-months

Applicable Compliance Method:
Compliance with this emission limit may be based on an emission factor of 2.83 lbs/hour of filterable particulate emissions which was established through stack testing of the source. These stack tests were performed on March 27, 2009 and September 16, 2009. The emission factor may be used to demonstrate compliance with the annual allowable emission rate by multiplying the 2.83 lbs/hr emission factor by actual hours of operation per rolling, 12-months and dividing by 2000 lbs/ton. The lb/hr emission factor shall be replaced with the most current stack test results if additional testing occurs.
 - b. Emission Limitation:
Fugitive PM emissions shall not exceed 3.01 tons per rolling, 12-months

Applicable Compliance Method:
Compliance shall be shown by using an engineering emission factor of 0.43 lbs fugitive PM per ton of metal processed multiplied by the tons of metal processed per rolling 12-months and divided by 2000 lbs/ton.
 - c. Emission Limitation:
Visible particulate emissions from the baghouse stacks shall not exceed 20% opacity as a six-minute average, except as specified by rule; and visible emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:
Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.
 - d. Emission Limitation:
Particulate emissions shall not exceed 7.83 lbs/hr

Applicable Compliance Method:
Compliance shall be determined using Methods 1 through 5 in accordance with 40 CFR, Part 60, Appendix A.
 - (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 12 months prior to permit renewal.

- b. The emission testing shall be conducted on baghouses #1, #2, and #3 to demonstrate compliance with the allowable mass emission rate(s) for particulates, opacity, and lead emissions in the appropriate averaging period(s).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Particulates: Methods 1-5, 40 CFR Part 60, Appendix A

Opacity: Method 9, 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).
- f. Personnel from the Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

g) Miscellaneous Requirements

- (1) This emissions unit was installed in 1972.



5. P008, Rotary Melting Furnace No. 7

Operations, Property and/or Equipment Description:

Rotary Melting Furnace No. 7

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	BAT is equivalent to 3745-17-11(A) and 3745-31-05(D)(1)(b).
b.	OAC rule 3745-31-05(D)(1)(b) Synthetic Minor to avoid Title V	Particulate emissions (PE) from the baghouse stack(s) serving this emissions unit shall not exceed 18.98 tons per rolling, 12-months. Fugitive particulate matter shall not exceed 3.23 tons per rolling, 12-months. See b)(2)a. and c)(1) below.
c.	OAC rule 3745-17-07(A)(1)	The requirements of this rule are less stringent than the requirements established pursuant to 40 CFR Part 60 Subpart M.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity as a three-minute average, except as provided by rule.
e.	OAC rule 3745-17-08(B)	The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust. See b)(2)b. below.
f.	OAC rule 3745-17-11(A)	Particulate emissions shall not exceed 8.27 lbs/hr
g.	40 CFR Part 60, Subpart M [In accordance with 40 CFR 60.130 this emission unit is an rotary furnace at a Secondary Brass and Bronze production plant subject to the emissions limitations/control measures specified in this section.]	Visible particulate emissions from the stack associated with this emissions unit shall not exceed 10% opacity, as a 6-minute average. Particulate matter shall not exceed 0.022 grains per dry standard cubic feet (gr/dscf). See section B.2. above.

(2) Additional Terms and Conditions

- a. For the purpose of this restriction, all particulate emissions are assumed to be equivalent to or greater than PM_{2.5} and PM₁₀ emissions. As better test methods are developed to speciate PM_{2.5}, these numbers may change.
- b. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirement:
 - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

c) Operational Restrictions

- (1) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the hours of operation, upon issuance of this permit. The maximum annual operating hours for this emissions unit shall not exceed 7,488, based upon a rolling, 12-month summation of the operating hours.
- (2) Slag skimmings shall be air cooled indoors adequately before being placed outdoors.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. The operating hours for each month;
 - b. the tons of production for each month;
 - c. the rolling, 12-month summation of the operating hours; and
 - d. the rolling, 12-month summation of tons of production.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across baghouse #2 and baghouse #3 has been established to be not less than 2 inches of water; the acceptable pressure drop across baghouse #4 been established to be not less than 4 inches of water.
- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a once per shift basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

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

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

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;

- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

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

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

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions of fugitive dust 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 location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit;
 - ii. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range; and
 - iii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by Cleveland DAQ.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;

- d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(4) above:
- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions of fugitive dust.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
- a. Emission Limitation:
PE shall not exceed 18.98 tons per rolling, 12-months

Applicable Compliance Method:
Compliance with this emission limit may be based on an emission factor of 2.34 lbs/hour of filterable particulate emissions which was established through stack testing of the source. These stack tests were performed on May 11, 2005 and September 16, 2009. The emission factor may be used to demonstrate compliance with the annual allowable emission rate by multiplying the 2.34 lbs/hr emission factor by actual hours of operation per rolling, 12-months and dividing by 2000 lbs/ton. The lb/hr emission factor shall be replaced with the most current stack test results if additional testing occurs.
 - b. Emission Limitation:
Fugitive PM emissions shall not exceed 3.23 tons per rolling, 12-months

Applicable Compliance Method:
Compliance shall be shown by using an engineering emission factor of 0.43 lbs fugitive PM per ton of metal processed multiplied by the tons of metal processed per rolling 12-months and divided by 2000 lbs/ton.
 - c. Emission Limitation:
Visible particulate emissions from the baghouse stacks shall not exceed 10% opacity as a six-minute average, except as specified by rule; and visible emissions of fugitive dust shall not exceed 20% opacity as a three-minute average.



Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

d. Emission Limitation:

Particulate emissions shall not exceed 8.27 lbs/hr

Applicable Compliance Method:

Compliance shall be determined using Methods 1 through 5 in accordance with 40 CFR, Part 60, Appendix A.

(2) The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR Part 60, Subpart M, including the following sections:

60.133(b)	performance testing requirements in addition to 60.8
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Emissions testing showing compliance with 40 CFR Part 60, Subpart M was conducted on May 11, 2005 and September 16, 2009.

(3) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 12 months prior to permit renewal.
- b. The emission testing shall be conducted on baghouses #2, #3, and #4 to demonstrate compliance with the allowable mass emission rate(s) for particulates, opacity, and lead emissions in the appropriate averaging period(s).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Particulates: Methods 1-5, 40 CFR Part 60, Appendix A

Opacity: Method 9, 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such

notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).

- f. Personnel from the Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

g) **Miscellaneous Requirements**

- (1) This emissions unit was installed in 1981.