OhioEPA

State of Ohio Environmental Protection Agency

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

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

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

09/26/01

**CERTIFIED MAIL**

**RE: Final Title V Chapter 3745-77 permit**

06-30-01-0005
Shieldalloy Metallurgical Corporation
Mike Fusek
P.O. Box 310
60970 Southgate Road
Cambridge, OH 43725

Dear Mike Fusek:

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

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

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

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

If you have any questions, please contact Southeast District Office.

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Southeast District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

# FINAL TITLE V PERMIT

| Issue Date: **09/26/01** | Effective Date: **09/26/01** | Expiration Date: **09/26/06** |
|---|---|---|

This document constitutes issuance of a Title V permit for Facility ID: 06-30-01-0005 to:
Shieldalloy Metallurgical Corporation
P.O. Box 310
60970 Southgate Road
Cambridge, OH 43725

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

| | | |
|---|---|---|
| P010 (Furnace #2)<br>Electric arc melting furnace | P014 (Dept. 125 Fly Ash Roaster)<br>Multiple hearth roaster furnace | |
| P011 (Furnace #1 )<br>Electric arc melting furnace | | |

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

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

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

# PART I - GENERAL TERMS AND CONDITIONS

## A. State and Federally Enforceable Section

### 1. Monitoring and Related Recordkeeping and Reporting Requirements

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

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. The operating conditions existing at the time of sampling or measurement.

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

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
iii. Written reports, which identify any deviations from the federally enforceable <u>monitoring, recordkeeping, and reporting requirements</u> contained in this permit shall be submitted to

the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## 2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## 3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

## 4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

## 5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

## 6. General Requirements

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

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

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

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

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

## 7. Fees

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

## 8. Marketable Permit Programs

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

## 9. Reasonably Anticipated Operating Scenarios

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

## 10. Reopening for Cause

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

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

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

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

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

## 11. Federal and State Enforceability

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

## 12. Compliance Requirements

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

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

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

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

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

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

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

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

## 13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but

excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

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

## 14. Operational Flexibility

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

## 15. Emergencies

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

## 16. Off Permit Changes

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

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

b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or

pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

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

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

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

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

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

## 17. Compliance Method Requirements

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

## 18. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

## B. State Only Enforceable Section

### 1. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### 2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### 3. Records Retention Requirements

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

### 4. Inspections and Information Requests

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

this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

## 5. Scheduled Maintenance/Malfunction Reporting

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

## 6. Permit Transfers

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

## 7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

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

# Part II - Specific Facility Terms and Conditions

## A. State and Federally Enforcable Section

**None**

## B. State Only Enforceable Section

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

B003 - 4.2 mmBtu/hr boiler;
F001 - screen;
P001 - tertiary crusher;
P002 - V2O5 dump hopper;
P003 - VOCL3 plant;
P004 - Bauer mill;
P006 - vanadium pentoxide grinding system;
P007 - primary and secondary crusher;
P012 - sample prep. area crushing and pulverizing;
P013 - cerium briquetting;
P901 - residue crushing equipment;
P902 - residue handling system;
Z001 - chemical plant finger crusher;
Z003 - roaster lime silo;
Z004 - 110 HP emergency generator;
Z005 - slag pile;
Z006 - plant wide material handling;
Z007 - large cold cleaner;
Z008 - small cold cleaner;
Z009 - mix station; and
Z010 - raw material screener.

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

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Furnace #2 (P010)

**Activity Description:** Electric arc melting furnace

## A. State and Federally Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| electric arc furnace #2 controlled with a baghouse | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |
| | OAC rule 3745-17-07(B) | See A.I.2.b below. |
| | OAC rule 3745-17-08(B) | See A.I.2.a below. |
| | OAC rule 3745-17-11(B) | 33.6 lbs/hr of particulate emissions from furnace #1 (P011) and furnace #2 (P010), combined |

**2. Additional Terms and Conditions**

**2.a** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08 the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

**2.b** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

### II. Operational Restrictions

**1.** The pressure drop across each compartment of the baghouse shall be maintained within the range of 1.2 to 9.0 inches of water, while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

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

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

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

**2.** The permittee shall properly operate, and maintain equipment to monitor the pressure drop across each compartment of the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each compartment of the baghouse on a once per shift basis.

## IV. Reporting Requirements

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

**2.** The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across each compartment of the baghouse did not comply with the allowable range specified in section A.II.1. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

## V. Testing Requirements

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

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), and the procedures specified in OAC rule 3745-17-03(B)(1).

**1.b** Emission Limitation:

33.6 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

**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 3 months after permit issuance and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 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 this emissions unit and emissions unit P011 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

## V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

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

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Furnace #1 (P011)

**Activity Description:** Electric arc melting furnace

## A. State and Federally Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| electric arc furnace #1 controlled with a baghouse | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |
| | OAC rule 3745-17-07(B) | See A.I.2.b below. |
| | OAC rule 3745-17-08(B) | See A.I.2.a below. |
| | OAC rule 3745-17-11(B) | 33.6 lbs/hr of particulate emissions from furnace #1 (P011) and furnace #2 (P010), combined |

**2. Additional Terms and Conditions**

**2.a** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08 the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

**2.b** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

### II. Operational Restrictions

**1.** The pressure drop across each compartment of the baghouse shall be maintained within the range of 1.2 to 9.0 inches of water, while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

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

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

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

**2.** The permittee shall properly operate, and maintain equipment to monitor the pressure drop across each compartment of the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each compartment of the baghouse on a once per shift basis.

## IV. Reporting Requirements

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

**2.** The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across each compartment of the baghouse did not comply with the allowable range specified in section A.II.1. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

## V. Testing Requirements

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

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), and the procedures specified in OAC rule 3745-17-03(B)(1).

**1.b** Emission Limitation:

33.6 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

**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 3 months after permit issuance and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 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 this emissions unit and emissions unit P010 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

## V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

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

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Dept. 125 Fly Ash Roaster (P014)

**Activity Description:** Multiple hearth roaster furnace

## A. State and Federally Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| multiple hearth roaster controlled with a baghouse and a dry scrubber for SO2 | OAC rule 3745-31-05(A)(3) (PTI 06-5869) | See A.I.2.a below.<br><br>0.010 grain of particulate emissions per dry standard cubic foot of exhaust gases<br><br>no visible particulate emissions<br><br>10.5 tpy of particulate emissions<br><br>8.9 lbs/hr of nitrogen oxides (NOx)<br><br>39.0 tpy of NOx<br><br>8.9 lbs/hr of organic compounds (OC)<br><br>39.0 tpy of OC<br><br>The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21. |
| | OAC rule 3745-17-07(A) | See A.I.2.b below. |
| | OAC rule 3745-17-07(B) | See A.I.2.c below. |
| | OAC rule 3745-17-08(B) | See A.I.2.d below. |
| | OAC rule 3745-17-11(B) | See A.I.2.e below. |
| | OAC rule 3745-18-06(E) | See A.I.2.f below. |
| | 40 CFR Part 52.21 | 78.1 lbs/hr of sulfur dioxide (SO2)<br>342.1 tpy of SO2<br><br>78.0 lbs/hr of carbon monoxide (CO)<br>341.7 tpy of CO |
| | OAC rules 3745-21-08(B) and 3745-23-06(B) | See A.I.2.g below. |

**2. Additional Terms and Conditions**

**2.a** The permittee shall employ best available control measures on the multiple hearth roaster for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee shall maintain enclosures and vent emissions to a dry scrubber and baghouse which are capable of meeting the applicable requirements. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

**2.b** The visible particulate emission limitations required by OAC rule 3745-17-07 are less stringent than the visible particulate emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.

**2.c** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

**2.d** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08 the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

**2.e** The particulate emission limitation required by OAC rule 3745-17-11 is less stringent than the particulate emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.

**2.f** The SO2 emission limitation required by OAC rule 3745-18-06 is equivalent to the SO2 emission limitation established pursuant to the requirements specified in 40 CFR Part 52.21.

**2.g** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 06-5869.

## II. Operational Restrictions

**1.** The pressure drop across the baghouse shall be maintained within the range of 2 to 10 inches of water while the emissions unit is in operation.

## III. Monitoring and/or Record Keeping Requirements

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

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

**2.** The permittee shall operate and maintain equipment to continuously monitor and record SO2 from this emissions unit in units of the applicable standard (lbs/hr). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13. Prior to commencing operation of this emissions unit, the permittee shall submit information detailing the proposed location of the sampling site(s) in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2 for approval by the Ohio EPA, Central Office.

The permittee shall maintain records of all data obtained by the continuous SO2 monitoring system including, but not limited to, parts per million SO2 on an instantaneous (one-minute) basis, emissions of SO2 in units of the applicable standard in the appropriate averaging period (i.e., in lbs/hr, in lbs/hr as a rolling, 3-hour average, and in tons per year), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

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

**3.** Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous SO2 monitoring system designed to ensure continuous valid and representative readings of SO2. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous SO2 monitoring system must be kept on site and available for inspection during regular office hours.

**4.** The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.

## IV. Reporting Requirements

**1.** Pursuant to 40 CFR Part 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all rolling, 3-hour average SO2 values in excess of the applicable limit of 78.1 lbs/hr. These reports shall also contain the total SO2 emissions for the calendar quarter (in tons).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting any continuous SO2 monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

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

**3.** The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

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

**5.** The permittee shall also submit annual reports that specify the total particulate, NOx, OC, SO2, and CO emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation:

0.010 grain of particulate emissions per dry standard cubic foot of exhaust gases

Applicable Compliance Method:

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

**1.b** Emission Limitation:

10.5 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be determined using the following equation:

(tested emission rate, in lbs/hr) * (actual hours of operation, in hrs/yr) * 0.0005 ton/lb = tpy

**1.c** Emission Limitation:

no visible particulate emissions

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 22.

**1.d** Emission Limitation:

78.1 lbs/hr of SO2

Applicable Compliance Method:

Compliance shall be determined based upon the continuous emissions monitoring records required pursuant to section A.III.2. If required, compliance shall also be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

**1.e** Emission Limitation:

342.1 tpy of SO2

Applicable Compliance Method:

Compliance shall be determined based upon the continuous emissions monitoring records required pursuant to section A.III.2.

**1.f** Emission Limitation:

8.9 lbs/hr of NOx

Applicable Compliance Method:

Compliance may be determined by using the emission factor (as supplied by the manufacturer) of 0.04 lb/min of NOx and multiplying by 60 min/hr to obtain the hourly emission rate. If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

## V. Testing Requirements (continued)

**1.g** Emission Limitation:

39.0 tpy of NOx

Applicable Compliance Method:

Compliance shall be determined using the following equation:

lbs/hr (as calculated or from test data) * (actual hours of operation, in hrs/yr) * 0.0005 ton/lb = tpy

**1.h** Emission Limitation:

78.0 lbs/hr of CO

Applicable Compliance Method:

Compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

**1.i** Emission Limitation:

341.7 tpy of CO

Applicable Compliance Method:

Compliance shall be determined using the following equation:

(tested emission rate, in lbs/hr) * (actual hours of operation, in hrs/yr) * 0.0005 ton/lb = tpy

**1.j** Emission Limitation:

8.9 lbs/hr of OC

Applicable Compliance Method:

Compliance may be determined using the following equation:

0.107 lb of OC/ton of feed * 4.17 tons/hr = 0.45 lb/hr,

where 0.107 lb of OC/ton of feed is derived from samples of the raw material taken by the permittee. If required, compliance with this emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

**1.k** Emission Limitation:

39.0 tpy of OC

Applicable Compliance Method:

Compliance shall be determined using the following equation:

0.45 lb/hr * (actual hours of operation) * 0.0005 ton/lb = tpy

## V. Testing Requirements (continued)

**2.** Within 60 days of the effective date of this permit, the permittee shall conduct certification tests of the continuous SO2 monitoring system pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6. Personnel from the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the appropriate Ohio EPA District Office or local air agency and the Ohio EPA, Central Office within 30 days after the test is completed. Certification of the continuous SO2 monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6.

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

a. The particulate and SO2 emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration. The CO emission testing shall be conducted within 3 months after issuance of this permit and within 12 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitations for particulates, SO2, and CO.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission limitations: for particulates, Methods 1 through 4 and 5 of 40 CFR Part 60, Appendix A , for SO2, Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A, and for CO, Methods 1 through 4 and 10 of 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 appropriate Ohio EPA District Office or local air agency.

e. The pressure drop across the baghouse shall be monitored and recorded during the particulate emission tests.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| multiple hearth roaster controlled with a baghouse and a dry scrubber for SO2 | | |

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**1.** The permit to install for this emissions unit (P014) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 754,000

Maximum Hourly Emission Rate (lbs/hr): 0.26

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0737

MAGLC (ug/m3): 17,952

Pollutant: Sulfuric Acid

TLV (ug/m3): 1,000

Maximum Hourly Emission Rate (lbs/hr): 0.96

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2.72

MAGLC (ug/m3): 23.8

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

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

**None**

## V. Testing Requirements

**None**

## VI. Miscellaneous Requirements

**None**

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