



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

1/27/2011

Certified Mail

Mrs. Kimberly Ness  
Columbus Steel Castings  
2211 Parsons Avenue  
Columbus, OH 43207-2386

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0125040020  
Permit Number: P0105530  
Permit Type: Administrative Modification  
County: Franklin

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Central District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: U.S. EPA  
Ohio EPA-CDO





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Columbus Steel Castings**

Facility ID: 0125040020  
Permit Number: P0105530  
Permit Type: Administrative Modification  
Issued: 1/27/2011  
Effective: 1/27/2011





Division of Air Pollution Control
Permit-to-Install
for
Columbus Steel Castings

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## Authorization

Facility ID: 0125040020  
Facility Description: Steel Foundry  
Application Number(s): A0038390, A0038392, A0038425  
Permit Number: P0105530  
Permit Description: Admin mod to incorporate "air arc knuckle line" into the EU description and terms and condition. This is a steel foundry specializing in large castings.  
Permit Type: Administrative Modification  
Permit Fee: \$0.00  
Issue Date: 1/27/2011  
Effective Date: 1/27/2011

This document constitutes issuance to:

Columbus Steel Castings  
2211 Parsons Avenue  
Columbus, OH 43207-2386

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

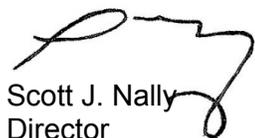
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally  
Director



## **Authorization (continued)**

Permit Number: P0105530  
Permit Description: Admin mod to incorporate "air arc knuckle line" into the EU description and terms and condition. This is a steel foundry specializing in large castings.

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

<b>Emissions Unit ID:</b>	<b>P041</b>
Company Equipment ID:	B-3658, B-3659, B-3660 Air Arc Turntables
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

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

**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. 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 re-issuance, or modification.

- 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, 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 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.

#### 4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) 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, 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.
- 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:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.
  - (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations,

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 made to the Ohio EPA DAPC, Central District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

- (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. 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.
  - (4) This permit is for an emissions unit located at a Title V facility. 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.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office 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 shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.
- c) 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:

- (1) 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.
  - (2) 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 ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) 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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office 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:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) 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.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. 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.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.
- 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 state-only required 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 Ohio EPA DAPC, Central District Office. 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 (i.e., postmarked) quarterly, 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.)

#### 10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

#### 11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All

records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## 12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## 13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## 14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

## 15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. 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.

**19. 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.

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

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.

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



**1. P041, B-3658, B-3659, B-3660 Air Arc Turntables**

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

(3) Air Arc Turntables and (1) Air Arc Knuckle Line in Coupler Building

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)  (Established by PTI 01-2694, issued final 12/5/1990)	Particulate emissions (PE) from the baghouse stack shall not exceed 6.9 pounds per hour (lbs/hr) and 13.8 tons per year (tpy).  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).  See b)(2)a. and c)(1)-(2)
b.	OAC rule 3745-17-07(A)	Visible PE from the baghouse stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-08(B)	The emission limitation and control measures required by this rule less stringent than the emission limitation and control measures required pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(B)	The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

## (2) Additional Terms and Conditions

- a. If the emissions testing required for this emissions unit demonstrates that the allowable emissions rate from Figure II is more stringent than 6.9 lbs/hr, the permittee shall comply with the more stringent limitation.
- b. The permittee shall eliminate emissions of fugitive dust through the employment of best available technology (BAT). The measures shall include, but not limited to, the following:
  - i. the use of an enclosure and hooding, in RACM area 34-4, around the air arc turntables and air arc knuckle line to achieve a minimum 90% capture efficiency of potential emissions of fugitive dust; and
  - ii. all fugitive dust captured within the RACM area shall be vented to the baghouse B-3656, which shall achieve an outlet loading of not greater than 0.020 grain of particulate emission per dry standard cubic foot (gr/dscf) of exhaust gases.

By employing the above-mentioned measures, there shall be no visible emissions of fugitive dust from any non-stack egress point from the building housing RACM area 34-4, including, but not limited to: doorways, windows and roof openings.

- c. The permittee shall maintain this emissions unit and associated air pollution control equipment in accordance with the Preventative Maintenance and Malfunction Abatement Plan (PM&MAP) as approved on August 15, 1995, in accordance with OAC rule 3745-15-06(D). Any changes in the PM&MAP shall be approved in writing by Ohio EPA prior to implementation.

## c) Operational Restrictions

- (1) The maximum monthly number of hours of operation for this emissions unit shall not exceed 333.
- (2) The pressure drop across baghouse B-3656 shall be maintained within the range of 2 to 10 inches of water while the emissions unit is in operation.

## d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly operate and maintain equipment to monitor the pressure drop across baghouse B-3656 while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the following in the operations log (Form 18, 5/95):
  - a. the pressure drop across the baghouse for each day when the emissions unit was in operation; and
  - b. a log or record of the downtime for the control device and monitoring equipment, when the emissions unit was in operation.

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the color of the emissions;
    - b. the total duration of any visible emission incident; and
    - c. any corrective actions taken to eliminate the visible emissions.
  - (3) 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 and roof openings) 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 eliminate the visible emissions.
  - (4) The permittee shall maintain monthly records of the total operating hours for this emissions unit.
- e) Reporting Requirements
- (1) In accordance with Part 1-General Terms and Conditions, Section A of this permit, the permittee shall submit quarterly deviation (excursion) reports for the following:
    - a. all exceedences of the monthly operating hours limitation in c)(1); and
    - b. all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in c)(2) above.
  - (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows and doors) serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible emissions of fugitive dust. These reports shall be submitted to the Director (the Ohio EPA, Central District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
  - (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack serving

this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Central District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. PE from the baghouse stack shall not exceed 6.9 pounds per hour; an outlet loading of not greater than 0.020 grain of particulate emissions per dry standard cubic foot; a minimum 90% capture efficiency of potential emissions of fugitive dust.

Applicable Compliance Method:

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

- i. The emission testing shall be conducted within 6 months following permit issuance and 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and the minimum 90% capture efficiency for the fugitive dust.
- iii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR, Part 60, Appendix A and for the capture efficiency, Method 22 of 40 CFR, Part 60, Appendix A (see f)(1)a.vi.).
- iv. Particulate emission tests also shall be conducted at the inlet of the control device to determine the uncontrolled mass rate of emissions for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11. For this testing, Methods 1 through 5 of 40 CFR, Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(10) shall be employed.
- v. Concurrent visible emissions observations at the baghouse exhaust shall be conducted during the emissions testing in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
- vi. Concurrent visible emissions observations at the doorways, windows and roof opening egress points shall be conducted during the emission testing in accordance with 40 CFR, Part 60, Appendix A, Method 22. At a minimum, three fifteen (15)-minute observation periods shall be conducted during each one-hour Method 5 test run. Appropriate rest breaks shall be taken between each observation period in accordance with Section 11.4.3 of Method 22.

- vii. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office . The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person who will be conducting the test. Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test.

Personnel from the Ohio EPA, Central District Office 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 shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

(2) Emission Limitation:

Visible PE from the baghouse stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

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

(3) Emission Limitations:

No visible PE from doorways, windows and roof openings and from the baghouse exhaust stack

Applicable Compliance Method:

Compliance shall be based upon the daily checks for any visible emissions performed pursuant to section d)(3); and, if required, compliance shall be demonstrated by visible emission evaluations performed in accordance with 40 CFR, Part 60, Appendix A, Method 22 using the methods and procedures specified in OAC rule 3745-17-03(B)(4).

(4) Emission Limitation:

PE shall not exceed 13.8 tons per year.

Applicable Compliance Method:

Compliance with the annual limitation shall be assumed provided compliance is maintained with the operating hours restriction and the allowable hourly emission rate.

$6.9 \text{ lbs/hr} \times 333 \text{ hrs/mo. (max)} \times 12 \text{ months/yr} \times 1 \text{ ton/2000 lbs} = 13.8 \text{ TPY.}$

(5) Emission Limitation:

The use of an enclosure and hooding, in RACM area 34-4, around the air arc turntable and vented to baghouse B-3656 to achieve a minimum 90% capture efficiency of potential fugitive PE.

Applicable Compliance Method:

Compliance with the capture efficiency requirements shall be based on the results of the emission testing conducted in accordance with the procedures outlined in section f)(1) of this permit.

g) Miscellaneous Requirements

(1) None.