



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
LORAIN COUNTY**

**CERTIFIED MAIL**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.  
Center

**Application No: 02-17170**

**DATE: 1/2/2003**

Republic Engineered Products  
Mark Conti  
1807 East 28th St  
Lorain, OH 44055

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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 within thirty (30) days after the notice of the Directors 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. 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

Very truly yours,

*Michael W. Ahern*

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

CC: USEPA

NEDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: 1/2/2003  
Effective Date: 1/2/2003**

**FINAL PERMIT TO INSTALL 02-17170**

Application Number: 02-17170  
APS Premise Number: 0247080229  
Permit Fee: **\$4000**  
Name of Facility: Republic Engineered Products  
Person to Contact: Mark Conti  
Address: 1807 East 28th St  
Lorain, OH 44055

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1807 East 28th St**  
**Lorain, Ohio**

Description of proposed emissions unit(s):  
**2 abrasive saws.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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



Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit To Install General Terms and Conditions

#### 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, 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:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable 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 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 appropriate Ohio EPA District Office or local air agency. 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. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. 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 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).

## **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. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

## 8. 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.

## 9. Compliance Requirements

- a. 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.
- 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 ORC section 3704.08.
  - 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.

#### 10. Permit To Operate Application

- a. If 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).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

#### 11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

#### 12. 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.

## **B. State Only Enforceable Permit To Install General Terms and Conditions**

### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

### **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 of state-only enforceable 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 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 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. 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.

### **4. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

## **5. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

## **6. 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.

## **7. 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).

## **8. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**9. 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.

**C. Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	5.32

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Republic Engineered Products

PTI Application: **02-17170**

**Issued: 1/2/2003**

Facility ID: **0247080229**

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
	OAC rule 3745-17-07(A)(1)
P094 - Abrasive Saw No. 1, used to cut steel bar to length, equipped with a cyclone and venturi scrubber in series.	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-08(B)
	OAC rule 3745-17-07(B)(1)
	OAC rule 3745-35-07(B)
	OAC rule 3745-17-11

Applicable Emissions  
Limitations/Control  
Measures

Particulate emissions leaving the stack from the cyclone and venturi scrubber, which are in series, shall not exceed 0.023 grain per dry standard cubic foot; and 1.71 pounds per hour.

The total annual particulate emissions leaving the stacks from emissions units P094 and P095 together shall not exceed 3.07 tons per year.

Visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average.

The total fugitive particulate emissions from emissions units P094 and P095 together shall not exceed 2.25 tons per year.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established

pursuant to OAC rule 3745-31-05(A)(3).

See Section A.I.2.a below.

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a three-minute average. See Section A.I.2.b below.

See Section A.I.2.c below.

The total annual particulate emissions limitation and the total annual fugitive particulate emissions limitation for emissions units P094 and P095 shall be achieved by restricting the maximum hours of operation.

## **2. Additional Terms and Conditions**

**2.a** The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:

- i. installation and use of hoods, fan, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust; and
- ii. maintain a collection efficiency that is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

At a minimum, the permittee's employment of RACM shall include the following: localized hooding over the emissions unit.

**2.b** For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

**2.c** The total emissions from emissions units P094 and P095 together shall not exceed the following limits:

- i. the total annual particulate emissions leaving the stacks from emissions units P094 and P095 shall not exceed 3.07 tons per year, based on a rolling 12-month period; and
- ii. the total fugitive particulate emissions from emissions units P094 and P095 shall not exceed 2.25 tons per year based on a rolling 12-month period.

Compliance shall be demonstrated by not exceeding 3,591 total hours of operation for emissions units P094 and P095 together, during any rolling 12-month period.

## **II. Operational Restrictions**

1. In order to maintain compliance with the allowable particulate emission rate, the established static pressure drop across the wet scrubber, derived from the most recent emission test that demonstrated the emissions unit to be in compliance, shall be maintained at all times.

**Issued**

Emissions Unit ID: P094

- 2. In order to maintain compliance with the allowable particulate emission rate, the established scrubber water flow rate, derived from the most recent emission test that demonstrated the emissions unit to be in compliance shall be maintained at all times.
- 3. The total hours of operation for emissions units P094 and P095 together shall not exceed 3,591 hours, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the operating hours levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	299
1-2	599
1-3	897
1-4	1,197
1-5	1,496
1-6	1,796
1-7	2,095
1-8	2,394
1-9	2,693
1-10	2,993
1-11	3,292
1-12	3,591

After the first 12 calendar months of operation, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

**III. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the pressure drop across the scrubber, in inches of water, on a daily basis;
  - b. the scrubber water flow rate, in gallons per minute, on a daily basis; and
  - c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- 2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the

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weather conditions allow, for any visible particulate emissions from any building openings housing this emissions unit. These building openings shall include, but not limited to, doorways, windows, and roof monitors. 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.
3. The permittee shall maintain monthly records of the following information for P094:
- a. the operating hours for each month;
  - b. during the first 12 calendar months of operation, the cumulative operating hours for each calendar month; and
  - c. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the operating hours.
4. The permittee shall maintain monthly records of the following information for emissions units P094 and P095:
- a. the total hours of operation for each month;
  - b. during the first 12 calendar months of operation, the total cumulative hours for each calendar month; and
  - c. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the total operating hours.

#### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the static pressure drop across the scrubber and/or the scrubber water flow rate were not maintained at or above the level set during the most recent stack test that demonstrated the emissions unit to be in compliance.

2. The permittee shall submit written reports which (a) identify all days during which any visible particulate emissions were observed from any building openings housing 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 Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation, and for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative operating hours levels (Section A.II.3). The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

## V. Testing Requirements

Compliance with the emissions limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation:
 

0.023 grain of particulate emissions per dry standard cubic foot of exhaust gases from the stack of the cyclone and venturi scrubber

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in Section V.4.
2. Emission Limitation:
 

1.71 pounds of particulate emissions per hour from the stack of the cyclone and venturi scrubber

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in Section V.4.
3. Emission Limitation:
 

3.07 tons of particulate emissions per year, leaving the stacks from emissions units P094 and P095 together, based on a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be determined by using the following equation:

$$E = [(A \times B) + (C \times D)]/2000 \text{ lbs/tons}$$

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Where:

- E = total particulate emission rate in tons per year, based on a rolling 12-month summation from emissions units P094 and P095
- A = hourly particulate emission rate, as determined by the emission testing specified in Section V.4 for emissions unit P094. Until this testing is conducted and the testing results received, the limit of 1.71 pounds of particulate emissions per hour shall be used.
- B = hours of operation, based on a rolling 12-month summation, as recorded in Section III.3 for emissions unit P094
- C = hourly particulate emission rate, as determined by the emission testing specified in Section V.4 for emissions unit P095. Until this testing is conducted and the testing results received, the limit of 1.71 pounds of particulate emissions per hour shall be used.
- D = hours of operation, based on a rolling 12-month summation, as recorded in Section III.3 for emissions unit P095

Compliance shall be demonstrated by not exceeding 3,591 total hours of operation for emissions units P094 and P095 together, during any rolling 12-month period.

4. Within 2 months after startup, the permittee shall conduct or have conducted an emission test for this emissions unit in order to demonstrate compliance with the allowable mass emission rates for particulate emissions. The compliance test shall be conducted in accordance with the test methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

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 Northeast District Office. 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast 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(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast 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 Northeast District Office.

## 5. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 5% opacity as a six-minute average.

## Applicable Compliance Method:

Compliance with the visible emission limitation for the identified Abrasive Saw above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

## 6. Emission Limitation:

Visible particulate emissions of fugitive emissions shall not exceed 20% opacity as a three-minute average.

## Applicable Compliance Method:

Compliance with the visible emission limitation for the Abrasive Saw identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

## 7. Emission Limitation:

2.25 tons per year of fugitive particulate emissions from emissions units P094 and P095 together, based on a rolling 12-month summation

## Applicable Compliance Method:

Compliance shall be determined by using the following equation:

$$E = [A \times B \times (1-95\%) ] / 2000 \text{ lbs/ton} + [C \times D \times (1-95\%) ] / 2000 \text{ lbs/ton}$$

Where:

E = total fugitive particulate emission rate in tons per year, based on a rolling 12-month summation from emissions units P094 and P095

A = uncontrolled particulate matter emission rate, 25.00 lbs/hr

B = hours of operation, based on a rolling 12-month summation, as recorded in Section III.3 for emissions unit P094

95% = overall capture efficiency of emissions unit

C = uncontrolled particulate matter emission rate, 25.00 lbs/hr

D = hours of operation, based on a rolling 12-month summation, as recorded in Section III.3

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Emissions Unit ID: P094

for emissions unit P095

95% = overall capture efficiency of emissions unit

Compliance shall be demonstrated by not exceeding 3,591 total hours of operation for emissions unit P094 and P095 together, during any rolling 12-month period.

**VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

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

- 1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P094 - Abrasive Saw No. 1, used to cut steel bar to length, equipped with a cyclone and venturi scrubber in series.		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P095 - Abrasive Saw No. 2, used to cut steel bar to length, equipped with a cyclone and venturi scrubber in series.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-08(B)
		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-35-07(B)
	OAC rule 3745-17-11	

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Applicable Emissions  
Limitations/Control  
Measures

Particulate emissions leaving the stack from the cyclone and venturi scrubber, which are in series, shall not exceed 0.023 grain per dry standard cubic foot; and 1.71 pounds per hour.

The total annual particulate emissions leaving the stacks from emissions units P094 and P095 together shall not exceed 3.07 tons per year.

Visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average.

The total fugitive particulate emissions from emissions units P094 and P095 together shall not exceed 2.25 tons per year.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established

pursuant to OAC rule 3745-31-05(A)(3).

See Section A.I.2.a below.

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a three-minute average. See Section A.I.2.b below.

See Section A.I.2.c below.

The total annual particulate emissions limitation and the total annual fugitive particulate emissions limitation for emissions units P094 and P095 shall be achieved by restricting the maximum hours of operation.

**2. Additional Terms and Conditions**

**2.a** The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:

- i. installation and use of hoods, fan, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust; and
- ii. maintain a collection efficiency that is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

At a minimum, the permittee's employment of RACM shall include the following: localized hooding over the emissions unit.

**2.b** For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

**2.c** The total emissions from emissions units P094 and P095 together shall not exceed the following limits:

- i. the total annual particulate emissions leaving the stacks from emissions units P094 and P095 shall not exceed 3.07 tons per year, based on a rolling 12-month period; and
- ii. the total fugitive particulate emissions from emissions units P094 and P095 shall not exceed 2.25 tons per year based on a rolling 12-month period.

Compliance shall be demonstrated by not exceeding 3,591 total hours of operation for emissions unit P094 and P095 together, during any rolling 12-month period.

**II. Operational Restrictions**

1. In order to maintain compliance with the allowable particulate emission rate, the established static pressure drop across the wet scrubber, derived from the most recent emission test that demonstrated the emissions unit to be in compliance, shall be maintained at all times.

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2. In order to maintain compliance with the allowable particulate emission rate, the established scrubber water flow rate, derived from the most recent emission test that demonstrated the emissions unit to be in compliance shall be maintained at all times.
3. The total hours of operation for emissions units P094 and P095 together shall not exceed 3,591 hours, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the operating hours levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	299
1-2	599
1-3	897
1-4	1,197
1-5	1,496
1-6	1,796
1-7	2,095
1-8	2,394
1-9	2,693
1-10	2,993
1-11	3,292
1-12	3,591

After the first 12 calendar months of operation, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the pressure drop across the scrubber, in inches of water, on a daily basis;
  - b. the scrubber water flow rate, in gallons per minute, on a daily basis; and
  - c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the

weather conditions allow, for any visible particulate emissions from any building openings housing this emissions unit. These building openings shall include, but not limited to, doorways, windows, and roof monitors. 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.
3. The permittee shall maintain monthly records of the following information for P095:
- a. the operating hours for each month;
  - b. during the first 12 calendar months of operation, the cumulative operating hours for each calendar month; and
  - c. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the operating hours.
4. The permittee shall maintain monthly records of the following information for emissions units P094 and P095:
- a. the total hours of operation for each month;
  - b. during the first 12 calendar months of operation, the total cumulative hours for each calendar month; and
  - c. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the total operating hours.

#### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the static pressure drop across the scrubber and/or the scrubber water flow rate were not maintained at or above the level set during the most recent stack test that demonstrated the emissions unit to be in compliance.

2. The permittee shall submit written reports which (a) identify all days during which any visible particulate emissions were observed from any building openings housing 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 Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation, and for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative operating hours levels (Section A.II.3). The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

## V. Testing Requirements

Compliance with the emissions limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation:

0.023 grain of particulate emissions per dry standard cubic foot of exhaust gases from the stack of the cyclone and venturi scrubber

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in Section V.4.

2. Emission Limitation:

1.71 pounds of particulate emissions per hour from the stack of the cyclone and venturi scrubber

Applicable Compliance Method:

Compliance shall be determined by emission testing as specified in Section V.4.

3. Emission Limitation:

3.07 tons of particulate emissions per year, leaving the stacks from emissions units P094 and P095 together, based on a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be determined by using the following equation:

$$E = [(A \times B) + (C \times D)]/2000 \text{ lbs/tons}$$

Where:

- E = total particulate emission rate in tons per year, based on a rolling 12-month summation from emissions units P094 and P095
- A = hourly particulate emission rate, as determined by the emission testing specified in Section V.4 for emissions unit P094. Until this testing is conducted and the testing results received, the limit of 1.71 pounds of particulate emissions per hour shall be used.
- B = hours of operation, based on a rolling 12-month summation, as recorded in Section III.3 for emissions unit P094
- C = hourly particulate emission rate, as determined by the emission testing specified in Section V.4 for emissions unit P095. Until this testing is conducted and the testing results received, the limit of 1.71 pounds of particulate emissions per hour shall be used.
- D = hours of operation, based on a rolling 12-month summation, as recorded in Section III.3 for emissions unit P095

Compliance shall be demonstrated by not exceeding 3,591 total hours of operation for emissions unit P094 and P095 together, during any rolling 12-month period.

4. Within 2 months after startup, the permittee shall conduct or have conducted an emission test for this emissions unit in order to demonstrate compliance with the allowable mass emission rates for particulate emissions. The compliance test shall be conducted in accordance with the test methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

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 Northeast District Office. 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast 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(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast 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 Northeast District Office.

## 5. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 5% opacity as a six-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation for the identified Abrasive Saw above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

## 6. Emission Limitation:

Visible particulate emissions of fugitive emissions shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation for the Abrasive Saw identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

## 7. Emission Limitation:

2.25 tons per year of fugitive particulate emissions from emissions units P094 and P095 together, based on a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be determined by using the following equation:

$$E = [A \times B \times (1-95\%) ] / 2000 \text{ lbs/ton} + [C \times D \times (1-95\%) ] / 2000 \text{ lbs/ton}$$

Where:

E = total fugitive particulate emission rate in tons per year, based on a rolling 12-month summation from emissions units P094 and P095

A = uncontrolled particulate matter emission rate, 25.00 lbs/hr

B = hours of operation, based on a rolling 12-month summation, as recorded in Section III.3 for emissions unit P094

95% = overall capture efficiency of emissions unit

C = uncontrolled particulate matter emission rate, 25.00 lbs/hr

D = hours of operation, based on a rolling 12-month summation, as recorded in Section III.3

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for emissions unit P095

95% = overall capture efficiency of emissions unit

Compliance shall be demonstrated by not exceeding 3,591 total hours of operation for emissions unit P094 and P095 together, during any rolling 12-month period.

**VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P095 - Abrasive Saw No. 2, used to cut steel bar to length, equipped with a cyclone and venturi scrubber in series.		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

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None