



Environmental Protection Agency

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

5/7/2012

Mr. Peter Anselmi  
AMERICAN SPRING WIRE CORP  
26300 Miles Road  
Bedford Heights, OH 44146

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1318041114  
Permit Number: P0095113  
Permit Type: Renewal  
County: Cuyahoga

Certified Mail

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
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very 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

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb 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: CDAQ





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
AMERICAN SPRING WIRE CORP**

Facility ID:	1318041114
Permit Number:	P0095113
Permit Type:	Renewal
Issued:	5/7/2012
Effective:	5/7/2012
Expiration:	5/7/2022



**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
AMERICAN SPRING WIRE CORP

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## Authorization

Facility ID: 1318041114  
Application Number(s): A0026638  
Permit Number: P0095113  
Permit Description: PTIO renewal permit for emissions units including grinders, surface removal lines, furnaces, HCL batch tanks, and inspection lines. Superseded permits P0057810, P0057811, P0057813, P0057815, 13-03861, 13-3310.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 5/7/2012  
Effective Date: 5/7/2012  
Expiration Date: 5/7/2022  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

AMERICAN SPRING WIRE CORP  
26300 MILES AVE  
BEDFORD HTS, OH 44146

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

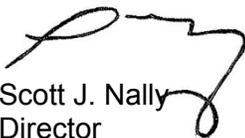
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0095113

Permit Description: PTIO renewal permit for emissions units including grinders, surface removal lines, furnaces, HCL batch tanks, and inspection lines. Superseded permits P0057810, P0057811, P0057813, P0057815, 13-03861, 13-3310.

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>P001</b>
Company Equipment ID:	Patenting Furnace #1
Superseded Permit Number:	P0057810
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Tempering Furnace 1
Superseded Permit Number:	P0057811
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	HCl Batch Tanks
Superseded Permit Number:	P0057813
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	Surface Removal Line XR-5
Superseded Permit Number:	P0057815
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P008</b>
Company Equipment ID:	CR-30 In-Line Wire Descaling
Superseded Permit Number:	13-03861
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P013</b>
Company Equipment ID:	Surface Removal Line XR-4
Superseded Permit Number:	13-03861
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P014</b>
Company Equipment ID:	Tempering Furnace 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P015</b>
Company Equipment ID:	Tempering Furnace 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P016</b>
Company Equipment ID:	Tempering Furnace 4
Superseded Permit Number:	13-03861
General Permit Category and Type:	Not Applicable

<b>Emissions Unit ID:</b>	<b>P017</b>
Company Equipment ID:	Patenting Furnace, P-2
Superseded Permit Number:	13-3310
General Permit Category and Type:	Not Applicable

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

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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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

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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

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

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

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

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

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

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.

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



1. P001, Patenting Furnace #1

Operations, Property and/or Equipment Description:

A 9.3 MMBTU natural gas fired patenting furnace for heat treating steel wires.

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

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

a. None.

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

a. 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(F)	Particulate matter (PM) emissions shall not exceed 3.56 lbs/hour and 15.6 TPY from this emissions unit.  Lead emissions shall not exceed 0.18 lb/hr and 0.78 TPY from this emissions unit.
b.	OAC rule 3745-17-07(B)	The visible emission of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
c.	OAC rule 3745-17-08(B)	Reasonably available control measures (RACM) must be employed to sufficiently minimize or eliminate visible emissions of fugitive dust.  See b)(2)b. below.

- (2) Additional Terms and Conditions
- a. The permittee shall not operate this emissions unit without a complete, minimum of four-inch thick, pea coke/graphite layer above the molten lead for the control of lead and particulate emissions from this emissions unit.
  - b. The permittee shall employ reasonably available control measures that shall include, but are not limited to the use of a minimum four inch-thick, pea coke/graphite layer above the molten lead. The layer of pea coke/graphite shall adequately minimize or eliminate lead and particulate emissions from this emissions unit.
- c) Operational Restrictions
- (1) The permittee shall burn only natural gas in this emissions unit.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain records of the purchase orders for graphite and pea coke used to replenish the emissions suppression layer above the lead bath.
  - (2) The permittee shall maintain records of the maintenance performed on this emissions unit to demonstrate that the emissions unit remains in proper operational order.
  - (3) The permittee shall maintain records of the replenishment of the pea coke and graphite covering (i.e. amount added and date).
  - (4) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
  - (5) 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 roof monitors which use fans to draw air out of the building) 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 location and color of the emissions;
    - b. the total duration of any visible emissions incident; and
    - c. any corrective actions taken to eliminate the visible emissions.
  - (6) The visible emission checks may be performed in person or using the facility's video surveillance system. When using the video surveillance system, the permittee shall ensure that the video surveillance system is able to clearly view all fugitive egress points (i.e. building roof monitors) serving this emissions unit.

## e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions:
  - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building roof monitors) serving this emissions unit; and
  - b. any corrective actions taken to eliminate the visible emissions of fugitive dust.

## f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

Particulate matter emissions shall not exceed 3.56 lbs/hour total from this emissions unit.

Applicable Compliance Method:

If required, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(1).
  - b. Emission Limitation:

Particulate matter emissions shall not exceed 15.6 TPY from this emissions unit.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emissions limitation by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emissions limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

c. Emission Limitation:

Lead emissions shall not exceed 0.18 lb/hr from this emissions unit.

Applicable Compliance Method:

The above emission limit was established from the most recent stack test conducted on August 24<sup>th</sup> 1995, and is the most recent test as of the effective date of this permit.

If required, compliance with the lb/hr emission limitation shall be demonstrated through emission tests conducted in accordance with USEPA Reference Methods 1-4 and Method 12 of 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(1).

d. Emission Limitation:

Lead emissions shall not exceed 0.78 TPY from this emissions unit.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours of operation per year and dividing by 2,000 lbs per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

e. Emission Limitation

Visible emissions from fugitive dust shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method

If required, compliance with the fugitive visible emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

## g) Miscellaneous Requirements

- (1) Emissions unit P001 was installed in 1969.



2. P002, Tempering Furnace 1

Operations, Property and/or Equipment Description:

A 15 MMBTU natural gas fired, continuous strand tempering furnace (number 1) with a lead heat transfer medium with a graphite and pea coke cover layer and oil quench.

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

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

a. None.

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

a. 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(F)	Particulate emissions shall not exceed 1.08 lbs/hour and 4.7 TPY from this emissions unit.  Lead emissions shall not exceed 0.1 lb/hr and 0.44 TPY from this emissions unit.
b.	OAC rule 3745-17-07(A)(1)	The visible particulate emissions from the stack serving this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by this rule.
c.	OAC rule 3745-17-07(B)	The visible emission of fugitive dust shall not exceed twenty percent opacity as a three-minute average.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)	Reasonably available control measures (RACM) must be employed to sufficiently minimize or eliminate visible emissions of fugitive dust.  See b)(2)b. below.
e.	OAC rule 3745-17-11(B)(1)	The particulate emission limitation established by this rule is less stringent than the particulate limitation established pursuant to OAC rule 3745-31-05(F).
f.	OAC rule 3745-21-07(M)	See b)(2)c. below.

(2) Additional Terms and Conditions

- a. The permittee shall not operate this emissions unit without a complete, minimum of four-inch thick, pea coke/graphite layer, above the molten lead for the control of lead and particulate emissions from this emissions unit.
- b. The permittee shall employ reasonably available control measures that shall include, but are not limited to the use of a minimum four inch-thick, pea coke/graphite layer above the molten lead. The layer of pea coke/graphite shall adequately minimize or eliminate lead and particulate emissions from this emissions unit.
- c. There are no VOC controls for this emissions unit and no baking, heat curing, or heat polymerization is occurring; therefore, the requirements of OAC rule 3745-21-07(M) do not apply.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the purchase orders for graphite and pea coke used to replenish the emissions suppression layer above the lead bath.
- (2) The permittee shall maintain records of the maintenance performed on this emissions unit to demonstrate that the emissions unit remains in proper operational order.
- (3) The permittee shall maintain records of the replenishment of the pea coke/graphite covering (i.e. amount added and date).

- (4) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
  - (5) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e. building roof monitors which use fans to draw air out of the building) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log:
    - a. the location and color of the emissions;
    - b. the total duration of any visible emissions incident; and
    - c. any corrective actions taken to eliminate the visible emissions.
  - (6) The visible emission checks may be performed in person or using the facility's video surveillance system. When using the video surveillance system, the permittee shall ensure that the video surveillance system is able to clearly view all stack and fugitive egress points (i.e. building roof monitors) serving this emissions unit.
  - (7) The permittee shall maintain records of the purchase orders for the quench oil used in this emissions unit.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
  - (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions:
    - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
    - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e. building roof monitors) serving this emissions unit; and
    - c. any corrective actions taken to eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions shall not exceed 1.08 lb/hour.

Applicable Compliance Method:

The above emission limit was established from the most recent stack test conducted on July 19<sup>th</sup>, 1995 and is the most recent test as of the effective date of this permit.

If required, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 4.7 TPY from this emissions unit.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emissions limitation by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emissions limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

c. Emission Limitation:

Lead emissions shall not exceed 0.1 lb/hr from this emissions unit.

Applicable Compliance Method:

The above emission limit was established from the most recent stack test conducted on July 19<sup>th</sup>, 1995 and is the most recent test as of the effective date of this permit.

If required, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, Method 12, and the procedures specified in OAC rule 3745-17-03(B)(1).

d. Emission Limitation:

Lead emissions shall not exceed 0.44 TPY from this emissions unit.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emissions limitation by 8,760 hours of operation per year and dividing by 2,000

pounds per ton. Therefore, compliance with the annual emissions limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

e. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed twenty percent opacity, as a six-minute average except as provided by rule; and visible emissions from fugitive dust shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the stack and fugitive visible emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR, Part 60, Appendix A.

- (2) The permittee shall conduct, or have conducted, emission testing for one of the following similar emissions units in accordance with the requirements below.

Emissions units P002, P014, P015 and P016 are similar emissions units. The permittee may test one of these units to fulfill this requirement. After one of these units is stack tested, the other emissions unit may be stack tested in the next required stack test cycle.

- a. The emission testing shall be conducted within 24 months of permit issuance for one of the following emission units P002, P014, P015 and P016.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate emissions and lead specified in b)(1).
- c. The following test methods shall be employed to demonstrate compliance with the emission limitations: Methods 1 through 5 of 40 CFR Part 60, Appendix A for PE and Method 12 of 40 CFR Part 60, Appendix A for lead emissions. Visible emission reading, using USEPA Method 9, shall be performed during each test run.
- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Cleveland DAQ. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures,

the emission unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).

- f. Personnel from the Cleveland DAQ shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. 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 Cleveland DAQ within 30 days following completion of the tests. The permittee may request addition time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

g) **Miscellaneous Requirements**

- (1) Emissions unit P002 was installed in 1971.

**3. P004, HCl Batch Tanks**

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

Hydrochloric Acid (HCL) batch tanks (1 and 2) controlled by a packed bed fume scrubber.

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

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

a. None.

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

a. 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) PTI (#13-335 Issued 6/1/1977)	The requirements of this rule include compliance with OAC rules 3745-17-07(A), 17-07(B), and 17-08(B).  See b)(2)a. below.
b.	OAC rule 3745-31-05(F)	Hydrochloric Acid (HCl) as particulate emissions (PE) shall not exceed 1.38 lbs/hour and 6.0 TPY from the stack serving this emissions unit.
c.	OAC rule 3745-17-07(A)	The visible particulate emissions from the stack serving this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by this rule.
d.	OAC rule 3745-17-07(B)	The visible emission of fugitive dust shall not exceed twenty percent as a three-minute average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-08(B)	Reasonably available control measures (RACM) must be employed to sufficiently minimize or eliminate visible emissions of fugitive dust.  See b)(2)a. and b)(2)b. below.
f.	OAC rule 3745-17-11(B)(1)	The particulate emission limitation established by this rule is less stringent than the particulate limitation established pursuant to OAC rule 3745-31-05(F).

(2) Additional Terms and Conditions

- a. The emissions from this emissions unit shall be vented to the packed bed scrubber control device with a control efficiency of 99% for particulate emissions at all times the emissions unit is in operation.
- b. The permittee shall employ reasonably available control measures that shall include, but are not limited to, the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control the fugitive dust from the emissions unit that shall meet the following requirements:
  - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering practices.

c) Operational Restrictions

- (1) The static pressure drop across the scrubber shall be continuously maintained at a value not less than 2 or more than 5 inches of water across the packing.
- (2) The scrubber water flow rate shall be continuously maintained at a value not less than 350-gallons per minute.
- (3) The pH of the scrubber liquor shall be maintained within the range of 8.0 to 12.0.
- (4) The permittee shall follow the manufacturer's recommended maintenance, at the recommended intervals, on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to the exhaust system, scrubber fans, and motors associated with those pumps and fans.
- (5) The scrubber internals and mist eliminators shall be cleaned at intervals sufficient to prevent buildup of solids or other fouling.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day:
  - a. the pressure drop across the scrubber in inches of water, on a once-per-shift basis;
  - b. the liquid pH on a once-per-shift basis;
  - c. the scrubber water flow rate, in gallons per minute, on a once-per-shift basis;
  - d. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- (2) The permittee shall properly operate, and maintain equipment to continuously monitor the static pressure drop across the scrubber, the scrubber water flow rate (in gallons per minute), and the pH for the scrubber employed for this emissions unit, while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

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

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

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

- a. a description of the corrective action;
- b. the date the corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time during which there was a deviation;

- e. the pressure drop, flow rate, and pH readings immediately after the corrective action(s) was/were implemented;
- f. the name(s) of personnel who performed the work.

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

The range(s) and/or limit(s) for the pressure drop, liquid flow rate, and pH are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (CDAQ) or the appropriate Ohio EPA District Office. The permittee may request revisions to the permitted range or limit for the pressure drop, liquid flow rate, or PH based upon information obtained during future performance tests that demonstrate compliance with the established HCL, PE, and VOC emission rates for this emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation for any visible emissions of fugitive dust from the egress points serving this emissions unit (i.e. building roof monitors which use fans to draw air out of the building). 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.
- (4) The visible emission checks may be performed in person or using the facility's video surveillance system. When using the video surveillance system, the permittee shall ensure that the video surveillance system is able to clearly view all fugitive egress points (i.e. building roof monitors) serving this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify the following information in the annual permit evaluation report:

- a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber, water flow rate, or pH was outside of the appropriate range or exceeded the appropriate limit established in this permit;
  - b. any period of time (start time and date, end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber;
  - c. each incident described above in "a" or "b" where a prompt investigation was not conducted;
  - d. each incident of deviation described above in "a" or "b" where prompt corrective action(s), that would bring the pressure drop, water flow rate, or pH into compliance with the acceptable range was determined to be necessary and were not taken; and
  - e. each incident of deviation described above in "a" or "b" where proper records were not maintained for the investigation and/or corrective action(s), as identified in the monitoring and recordkeeping requirements of this permit.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions:
- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e. building roof monitors) serving this emissions unit; and
  - b. any corrective actions taken to eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:  
HCl (as PE) shall not exceed 1.38 lbs/hr.  
  
Applicable Compliance Method:  
The above emission limit was established from the most recent stack test conducted on August 24<sup>th</sup>, 1995 and is the most recent test as of the effective date of this permit. If required, compliance with the lb/hr emission limitation shall be demonstrated through emissions tests in accordance with USEPA Reference Methods 1-4 and 26 or 26A (as appropriate), of 40 CFR Part 60, Appendix A.
  - b. Emission Limitation:  
HCl (as PE) shall not exceed 6.0 TPY.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emissions limitation by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emissions limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

c. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed twenty percent opacity as a six-minute average except as provided by rule; and visible emissions from fugitive dust shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the stack and fugitive visible emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

- (2) The permittee shall conduct, or have conducted, emission testing for P004. The emission testing shall be conducted within 24 months of permit issuance.
- a. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate emissions and HCl emissions specified in b)(1).
  - b. The following test methods shall be employed to demonstrate compliance with the emission limitations: Methods 1 through 4 and Method 26 or 26A of 40 CFR Part 60, Appendix A for HCl emissions. Visible emission reading, using USEPA Method 9, shall be performed during each test run.
  - c. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Cleveland DAQ. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
  - d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).

- e. Personnel from the Cleveland DAQ shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - f. 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 Cleveland DAQ within 30 days following completion of the tests. The permittee may request addition time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.
- g) Miscellaneous Requirements
- (1) None.



**4. P006, Surface Removal Line XR-5**

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

Grinding line (XR-5) controlled by a Rotoclone size 8 wet scrubber.

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. 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) PTI 13-819 Issued 9/17/1981	The requirements of this rule include compliance with the requirements of OAC rules 3745-17(07)(A), 17-07(B), and 17-08(B).  See b)(2)a. below.
b.	OAC rule 3745-31-05(F)	Particulate emissions (PE) shall not exceed 1.0 lb/hour and 4.4 TPY.
c.	OAC rule 3745-17-07(A)(1)	The visible particulate emissions from the stack serving this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by this rule.
d.	OAC rule 3745-17-07(B)	The visible emission of fugitive dust shall not exceed twenty percent opacity as a three-minute average.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-08(B)	Reasonably available control measures (RACM) must be employed to sufficiently minimize or eliminate visible emissions of fugitive dust.  See b)(2)a., b)(2)b., and b)(2)c. below.
f.	OAC rule 3745-17-11(B)(1)	The particulate emission limitation established by this rule is less stringent than the particulate limitation established pursuant to OAC rule 3745-31-05(F).

(2) Additional Terms and Conditions

- a. The emissions from this emissions unit shall be vented to the wet scrubber at all times when the emissions unit is in operation.
- b. The permittee shall employ reasonably available control measures that shall include, but are not limited to, the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control the fugitive dust from the emissions unit that shall meet the following requirements:
  - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering practices.

c) Operational Restrictions

- (1) The pressure drop across the scrubber shall be continuously maintained at a range of 6 to 11 inches of water at all times when this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly operate, and maintain equipment to continuously monitor the static pressure drop across each scrubber while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- (2) The permittee shall collect and record the following information each day:
  - a. the pressure drop across the scrubber, in inches of water, on a once-per shift basis;
  - b. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

- (3) The permittee shall perform daily checks when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e. building roof monitors which use fans to draw air out of the building) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall note the following in the operations log:
    - a. the location and color of emissions;
    - b. the total duration of any visible emissions incident; and
    - c. any corrective actions taken to eliminate the visible emissions.
  - (4) The visible emission checks may be performed in person or using the facility's color video surveillance system. When using the video surveillance system, the permittee shall ensure that the video surveillance system is able to clearly view all the fugitive egress points (i.e., building roof monitors) serving this emissions unit.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
  - (2) The permittee shall identify the following information in the annual permit evaluation report:
    - a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber was outside of the appropriate range or exceeded the appropriate limit established in this permit; and
    - b. any period of time (start time and date, end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber.
  - (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible fugitive emissions:
    - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e. building roof monitors) serving this emissions unit; and
    - b. any corrective actions taken to eliminate the visible emissions of fugitive dust.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions shall not exceed 1.0 lb/hr.

Applicable Compliance Method:

The above emissions limit was established from the most recent stack test conducted on August 4<sup>th</sup> 1993 and is the most recent test as of the effective date of this permit.

If required by Ohio EPA or Cleveland DAQ, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

b. Emission Limitation:

Particulate emissions shall not exceed 4.4 TPY.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

c. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule; and visible emissions from fugitive dust shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the stack and fugitive visible emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

- (2) The permittee shall conduct, or have conducted, emission testing for one of the following similar emissions units in accordance with the requirements below.

Emissions units P006 and P013 are similar emissions units. The permittee shall test one of these units to fulfill this requirement. After one of these units is stack tested, the other emissions unit may be stack tested in the next required stack test cycle.

- a. The emission testing shall be conducted within 24 months of permit issuance for one of the following emissions units P006 and P013.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate emissions specified in b)(1).

- c. The following test methods shall be employed to demonstrate compliance with the emission limitations: Methods 1 through 5 of 40 CFR Part 60, Appendix A for PE. Visible emission reading, using USEPA Method 9, shall be performed during each test run.
  - d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Cleveland DAQ. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
  - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).
  - f. Personnel from the Cleveland DAQ shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - g. 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 Cleveland DAQ within 30 days following completion of the tests. The permittee may request addition time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.
- g) Miscellaneous Requirements
- (1) None.



5. P008, DC-30 In-Line Wire Descaling

Operations, Property and/or Equipment Description:

Shotblast wire descaling line (Co. ID DC-30) with a maximum process weight rate of 3,500 lbs/hr controlled by a size 2.5 Rotoclone scrubber.

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

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

a. None.

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

a. 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) (PTI# 13-03861 Issued 4/29/2004)	Particulate emissions (PE) shall not exceed 2.14 lbs/hr and 9.37 TPY.  PM <sub>10</sub> emissions shall not exceed 0.62 lb/hr and 2.72 TPY.  Visible particulate emissions from the scrubber outlet shall not exceed ten percent opacity, as a six-minute average, during any sixty-minute observation period.
b.	OAC rule 3745-17-07(A)(1)	The visible particulate emission limitation established by this rule is equivalent to or less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(B)	The visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)	Reasonably available control measures (RACM) must be employed to sufficiently minimize or eliminate visible emissions of fugitive dust.  See b)(2)a. and b)(2)b. below.
e.	OAC rule 3745-17-11	The particulate emission limitation established by this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The emissions from this emissions unit shall be vented to the wet scrubber at all times when the emissions unit is in operation.
- b. The permittee shall employ reasonably available control measures that shall include, but are not limited to, the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control the fugitive dust from the emissions unit that shall meet the following requirements:
  - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering practices.

c) Operational Restrictions

- (1) The pressure drop across the scrubber shall be continuously maintained at a range of 6 to 11 inches of water at all times when the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

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

- (2) The permittee shall collect and record the following information each day:
    - a. the pressure drop across the scrubber, in inches of water, on a once-per-shift basis;
    - b. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
  - (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 roof monitors which use fans to draw air out of the building) serving this emissions unit. The presence or absence of any visible fugitive 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 location and color of the emissions;
    - b. the total duration of any visible emissions incident; and
    - c. any corrective actions taken to eliminate the visible emissions.
  - (4) The visible emission checks may be performed in person or using the facility's color video surveillance system. When using the video surveillance system, the permittee shall ensure that the video surveillance system is able to clearly view all the fugitive egress points (i.e., building roof monitors) serving this emissions unit.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
  - (2) The permittee shall identify the following information in the annual permit evaluation report:
    - a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber was outside of the appropriate range or exceeded the appropriate limit established in this permit; and
    - b. any period of time (start time and date, end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber.
  - (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible fugitive emissions:
    - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building roof monitors) serving this emissions unit; and

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

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions shall not exceed 2.14 lbs/hr.

Applicable Compliance Method:

The lb/hr emission limit was established based on the following calculation:

$$(2,500 \text{ acfm})(60 \text{ min/hour})(0.10 \text{ grain/acf})(1 \text{ lb}/7,000 \text{ grains}) = \text{lbs PE/hr}$$

If required by Ohio EPA or Cleveland DAQ, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03 (B)(10).

b. Emission Limitation:

Particulate emissions shall not exceed 9.37 TPY.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

c. Emission Limitation:

PM<sub>10</sub> emissions shall not exceed 0.62 lb/hr.

Applicable Compliance Method:

The PM<sub>10</sub> emission limit was determined from a PM<sub>10</sub> particle size distribution performed in March of 2004 which showed that PM<sub>10</sub> was 29% of the total particulate emissions.

If required, by Ohio EPA or Cleveland DAQ, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 201.

d. Emission Limitation:

PM<sub>10</sub> emissions shall not exceed 2.72 TPY.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pound per hour limitation.

e. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed ten percent opacity, as a six-minute average, except as provided by rule; and visible emissions from fugitive dust shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance with the stack and fugitive visible emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.



6. P013, Surface Removal Line XR-4

Operations, Property and/or Equipment Description:

Grinding line with three (3) continuously operating grinders (Co. ID XR-4) emissions controlled by two Rotoclonesize 6 wet scrubbers.

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

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

a. None.

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

a. 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) (PTI #13-03861 Issued 4/29/2004)	Particulate emissions (PE) shall not exceed 14.8 TPY.  PM <sub>10</sub> emissions shall not exceed 0.98 lb/hr and 4.29 TPY.  The requirements established pursuant to this rule include compliance with the requirements of OAC rule 3745-17-11(B)(1).  Visible particulate emissions from the stack serving this emissions unit shall not exceed ten percent opacity, as a six-minute average, during any sixty-minute observation period.
b.	OAC rule 3745-17-07(A)(1)	The visible emission limitation established by this rule is less stringent than the



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(B)	The visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)(3)	Reasonably available control measures (RACM) must be employed to sufficiently minimize or eliminate visible emissions of fugitive dust.  See b)(2)a. and b)(2)b. below.
e.	OAC rule 17-11(B)(1)	PE shall not exceed 3.38 lbs/hr.

(2) Additional Terms and Conditions

- a. The emissions from this emissions unit shall be vented to the wet scrubbers at all times when the emissions unit is in operation.
- b. The permittee shall employ reasonably available control measures that shall include, but not be limited to the installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions units shall meet the following requirements:
  - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering practices.

c) Operational Restrictions

- (1) The pressure drop across each scrubber shall be continuously maintained at a range of 6 to 11 inches of water at all times when this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly operate, and maintain equipment to continuously monitor the static pressure drop across each scrubber while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- (2) The permittee shall collect and record the following information each day:
  - a. the pressure drop across each scrubber, in inches of water, on a once-per shift basis;
  - b. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

- (3) The permittee shall perform daily checks when the emissions unit is in operation, for any visible emissions of fugitive dust from the egress points (i.e. building roof monitors which use fans to draw air out of the building) serving this emissions unit. The presence or absence of any visible fugitive 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 location and color of the emissions;
    - b. the total duration of any visible emissions incident; and
    - c. any corrective actions taken to eliminate the visible emissions.
  - (4) The visible emission checks may be performed in person or using the facility's color video surveillance system. When using the video surveillance system, the permittee shall ensure that the video surveillance system is able to clearly view all the fugitive egress points (i.e., building roof monitors) serving this emissions unit.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
  - (2) The permittee shall identify the following information in the annual permit evaluation report:
    - a. each period of time (start time and date, and end time and date) when the pressure drop across either scrubber was outside of the appropriate range or exceeded the appropriate limit established in this permit; and
    - b. any period of time (start time and date, end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber.
  - (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions:
    - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building roof monitors) serving this emissions unit; and
    - b. any corrective actions taken to eliminate the visible emissions.
- f) Testing Requirements

Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions shall not exceed 3.38 lbs/hr.

Applicable Compliance Method:

If required by Ohio EPA or Cleveland DAQ, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

b. Emission Limitation:

Particulate emissions shall not exceed 14.8 TPY.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

c. Emission Limitation:

PM<sub>10</sub> emissions shall not exceed 0.98 lb/hr.

Applicable Compliance Method:

The PM<sub>10</sub> emission limit was determined from a PM<sub>10</sub> particle size distribution analysis performed in March of 2004 which showed PM<sub>10</sub> consisting of 29 percent of the total particulate emissions.

If required, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 201.

d. Emission Limitation:

PM<sub>10</sub> emissions shall not exceed 4.29 TPY.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

e. Emission Limitation:

Visible particulate emissions from the stack shall not exceed ten percent opacity as a six-minute average, and visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the limitation for stack and fugitive visible emissions shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

- (2) The permittee shall conduct, or have conducted, emission testing for one of the following similar emissions units: P006 and P013 .

The permittee shall test one of these units to fulfill this requirement. After one of these units is stack tested, the other emissions unit may be stack tested in the next required stack test cycle.

The testing shall be done in accordance with the requirements outlined in Section C.4.f)(2) for emissions unit P006.

g) **Miscellaneous Requirements**

- (1) None.



7. P014, Tempering Furnace 2

Operations, Property and/or Equipment Description:

Continuous strand tempering furnace (number 2) using a lead heat transfer medium with a graphite and pea coke cover layer and oil quench.

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

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

a. None.

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

a. 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(F)	Particulate emissions (PE) shall not exceed 1.6 lbs/hour and 7.01 TPY.  Lead emissions shall not exceed 0.03 lb/hr and 0.13 TPY from this emissions unit.
b.	OAC rule 3745-17-07(A)(1)	The visible particulate emissions from the stack serving this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by this rule.
c.	OAC rule 3745-17-07(B)	The visible emission of fugitive dust shall not exceed twenty percent opacity as a three-minute average.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)	Reasonably available control measures (RACM) must be employed to sufficiently minimize or eliminate visible emissions of fugitive dust.  See b)(2)b. below.
e.	OAC rule 3745-17-11(B)(1)	The particulate emission limitation established by this rule is less stringent than the particulate limitation established pursuant to OAC rule 3745-31-05(F).
f.	OAC rule 3745-21-07(M)	See b)(2)c. below.

(2) Additional Terms and Conditions

- a. The permittee shall not operate this emissions unit without a complete, minimum of four-inch thick, pea coke/graphite layer, above the molten lead for the control of lead and particulate emissions from this emissions unit.
- b. The permittee shall employ reasonably available control measures that shall include, but are not limited to, the use of a four inch-thick pea coke/graphite layer above the molten lead. The layer of pea coke/graphite shall adequately minimize or eliminate lead and particulate emissions from this emissions unit.
- c. There are no VOC control for this emissions unit and no baking, heat curing, or heat polymerization is occurring; therefore, the requirements of OAC rule 3745-21-7(M) do not apply.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the purchase orders for graphite and pea coke used to replenish the emissions suppression layer above the lead bath.
- (2) The permittee shall maintain records of the maintenance performed on this emissions unit to demonstrate that the emissions unit remains in proper operational order.
- (3) The permittee shall maintain records of the replenishment of the pea coke/graphite covering (i.e. amount added and date).
- (4) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

- (5) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e. building roof monitors which use fans to draw air out of the building) 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 location and color of the emissions;
    - b. the total duration of any visible emissions incident; and
    - c. any corrective actions taken to eliminate the visible emissions.
  - (6) The visible emission checks may be performed in person or using the facility's color video surveillance system. When using the video surveillance system, the permittee shall ensure that the video surveillance system is able to clearly view all the stack and fugitive egress points (i.e., building roof monitors) serving this emissions unit.
  - (7) The permittee shall maintain records of the purchase orders for the quench oil used in the tempering furnace.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
  - (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions:
    - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
    - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building roof monitors) serving this emissions unit; and
    - c. any corrective actions taken to eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions shall not exceed 1.6 lbs/hour.

Applicable Compliance Method:

The above emission limitation was established from the most recent stack test conducted on July 20<sup>th</sup>, 1995 and is the most recent test as of the effective date of this permit.

If required, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 7.01 TPY from this emissions unit.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emissions limitation by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emissions limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

c. Emission Limitation:

Lead emissions shall not exceed 0.03 lb/hr from this emissions unit.

Applicable Compliance Method:

The above emission limitation was established from the most recent stack test conducted on July 20<sup>th</sup>, 1995 and is the most recent test as of the effective date of this permit.

If required, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, Method 12, and the procedures specified in OAC rule 3745-17-03(B)(1).

d. Emission Limitation:

Lead emissions shall not exceed 0.13 TPY from this emissions unit.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emissions limitation by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emissions limitation shall

be assumed provided compliance is maintained with the pounds per hour limitation.

e. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule; and visible emissions from fugitive dust shall not exceed twenty percent as a three-minute average.

Applicable Compliance Method

If necessary, compliance with the stack and fugitive visible emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR, Part 60, Appendix A.

- (2) The permittee shall conduct, or have conducted, emission testing for one of the following similar emissions units: P002, P014, P015, and P016.

The permittee shall test one of these units to fulfill this requirement. After one of these units is stack tested, the other emissions unit may be stack tested in the next required stack test cycle.

The testing shall be done in accordance with the requirements outlined in Section C.2.f)(2) for emissions unit P002.

g) **Miscellaneous Requirements**

- (1) Emissions unit P014 was installed in 1971.

**8. P015, Tempering Furnace 3**

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

Continuous strand tempering furnace (number 3) using a lead heat transfer medium with a graphite and pea coke cover layer and oil quench.

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

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

a. None.

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

a. 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(F)	Particulate emissions shall not exceed 1.08 lbs/hour and 4.7 TPY.  Lead emissions shall not exceed 0.1 lb/hr or 0.44 TPY from this emissions unit.
b.	OAC rule 3745-17-07(A)	The visible particulate emissions from the stack serving this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by this rule.
c.	OAC rule 3745-17-07(B)	The visible emission of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)	Reasonably available control measures (RACM) must be employed to sufficiently



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		minimize or eliminate visible emissions of fugitive dust.  See b)(2)b. below.
e.	OAC rule 3745-17-11(B)(1)	The particulate emission limitation established by this rule is less stringent than the particulate limitation established pursuant to OAC rule 3745-31-05(F).
f.	OAC rule 3745-21-07(M)(3)	See b)(2)c. below.

(2) Additional Terms and Conditions

- a. The permittee shall not operate this emissions unit without a complete, minimum of four-inch thick, pea coke/graphite layer above the molten lead for the control of lead and particulate emissions from this emissions unit.
- b. The permittee shall employ reasonably available control measures that shall include, but are not limited to the use of a four inch-thick layer of pea coke/graphite above the molten lead. The layer of pea coke/graphite shall adequately minimize or eliminate lead and particulate emissions from this emissions unit.
- c. There are no VOC controls for this emissions unit and no baking, heat curing, or heat polymerization is occurring; therefore, the requirements of OAC rule 3745-21-07(M) do not apply.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the purchase orders for graphite and pea coke used to replenish the emissions suppression later above the lead bath.
- (2) The permittee shall maintain records of the maintenance performed on this emissions unit to demonstrate that the emissions unit remains in proper operational order.
- (3) The permittee shall maintain records of the replenishment of the pea coke/graphite covering (i.e. amount added and date).
- (4) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (5) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack

and for any visible emissions of fugitive dust from the egress points (i.e. building roof monitors which use fans to draw air out of the building) 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 location and color of the emissions;
  - b. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (6) The visible emission checks may be performed in person or using the facility's color video surveillance system. When using the video surveillance system, the permittee shall ensure that the video surveillance system is able to clearly view all the stack and fugitive egress points (i.e., building roof monitors) serving this emissions unit.
- (7) The permittee shall maintain records of the purchase orders for the quench oil used in the tempering furnace.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
  - (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions:
    - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
    - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building roof monitors) serving this emissions unit; and
    - c. any corrective actions taken to eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:  
Particulate emissions shall not exceed 1.08 lb/hour.

Applicable Compliance Method:

The above emission limit was established from the most recent stack test conducted on July 18, 1995 and is the most recent test as of the effective date of this permit.

If required, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 4.7 TPY from this emissions unit.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emissions limitation by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emissions limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

c. Emission Limitation:

Lead emissions shall not exceed 0.1 lb/hr from this emissions unit.

Applicable Compliance Method:

The above emission limit was established from the most recent stack test conducted on July 18, 1995 and is the most recent test as of the effective date of this permit.

If required, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, Method 12, and the procedures specified in OAC rule 3745-17-03(B)(1).

d. Emission Limitation:

Lead emissions shall not exceed 0.44 TPY from this emissions unit.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emissions limitation by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emissions limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

e. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed twenty percent opacity, as a six-minute average, except as provided by this rule; and visible emissions from fugitive dust shall not exceed twenty percent as a three-minute average.

Applicable Compliance Method

If necessary, compliance with the stack and fugitive visible emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

- (2) The permittee shall conduct, or have conducted, emission testing for one of the following similar emission units: P002, P014, P015, and P016.

The permittee shall test one of these units to fulfill this requirement. After one of these units is stack tested, the other emissions unit may be stack tested in the next required stack test cycle.

The testing shall be done in accordance with the requirements outlined in Section C.2.f)(2) for emissions unit P002.

g) **Miscellaneous Requirements**

- (1) Emissions unit P015 was installed in 1973.



9. P016, Tempering Furnace 4

Operations, Property and/or Equipment Description:

Continuous strand tempering furnace (number 4) using a lead heat transfer medium with a graphite and pea coke cover layer and oil quench.

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

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

a. None.

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

a. 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) (PTI #13-03861 Issued 4/29/2004)	<p>Particulate emissions (PE) shall not exceed 1.38 lbs/hr and 6.04 TPY from this emissions unit.</p> <p>Lead emissions shall not exceed 0.135 lb/hr and 0.59 TPY.</p> <p>Carbon monoxide emissions shall not exceed 0.59 lb/hr and 2.58 TPY.</p> <p>Organic compound emissions shall not exceed 1.17 lb/hr and 5.12 TPY.</p> <p>Sulfur dioxide emissions shall not exceed 0.01 lb/hr and 0.04 TPY.</p> <p>Nitrogen oxide emissions shall not exceed 0.7 lb/hr and 3.1 TPY.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Visible emissions from any stack shall not exceed ten percent opacity, as a six-minute average, during any sixty minute observation period.
b.	OAC rule 3745-17-07(A)(1)	The visible particulate emission limitation established by this rule is less stringent than the visible particulate limitation established by OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(B)	The visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)(3)	Reasonably available control measures (RACM) must be employed to sufficiently minimize or eliminate visible emissions of fugitive dust.  See b)(2)b. below.
e.	OAC rule 3745-17-11	The particulate emission limitation established by this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-21-07(M)	See b)(2)c. below.

(2) Additional Terms and Conditions

- a. The permittee shall not operate this emissions unit without a complete, minimum of four-inch thick, pea coke/graphite layer, above the molten lead for the control of lead and particulate emissions from this emissions unit.
- b. The permittee shall employ reasonably available control measures that shall include, but are not limited to the use of a four inch-thick layer of pea coke/graphite layer above the molten lead. The layer of pea coke/graphite shall adequately minimize or eliminate lead and particulate emissions from this unit.
- c. There are no VOC controls for this emissions unit and no baking, heat curing, or heat polymerization is occurring; therefore the requirements of OAC rule 3745-31-07(M) do not apply.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

## d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the purchase orders for graphite and pea coke used to replenish the emissions suppression later above the lead bath.
- (2) The permittee shall maintain records of the maintenance performed on this emissions unit to demonstrate that the emissions unit remains in proper operational order.
- (3) The permittee shall maintain records of the replenishment of the pea coke/graphite covering (i.e. amount added and date).
- (4) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (5) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e. building roof monitors which use fans to draw air out of the building) 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 location and color of the emissions;
  - b. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (6) The visible emission checks may be performed in person or using the facility's color video surveillance system. When using the video surveillance system, the permittee shall ensure that the video surveillance system is able to clearly view all the stack and fugitive egress points (i.e., building roof monitors) serving this emissions unit.
- (7) The permittee shall maintain records of the purchase orders for the quench oil used in the tempering furnace.

## e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions:

- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
- b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building roof monitors) serving this emissions unit; and
- c. any corrective actions taken to eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions shall not exceed 1.38 lb/hour.

Applicable Compliance Method:

Compliance may be determined by multiplying a controlled particulate emissions factor of 0.228 pounds of PE per ton (based on emission testing conducted in July, 1995) by the maximum process rate (2.0 tons/hour).

If required, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 6.04 TPY from this emissions unit.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emissions limitation by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emissions limitation shall be assumed provided compliance is maintained with the pound per hour limitation.

c. Emission Limitation:

Lead emissions shall not exceed 0.135 lb/hour.

Applicable Compliance Method:

Compliance may be determined by multiplying a controlled lead emissions factor of 0.0674 lb of lead per ton (based on emission testing conducted in July, 1995) by the maximum process rate (2.0 tons/hour).

If required compliance with the lb/hr emission limitation shall be demonstrated through emission test performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 12.

d. Emission Limitation:

Lead emissions shall not exceed 0.59 TPY.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emissions limitation by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pound per hour limitation.

e. Emission Limitation:

Carbon monoxide emissions shall not exceed 0.59 lb/hr.

Applicable Compliance Method:

To determine compliance, use the emission factor (EF) for CO (84.0 lbs/MM scf) taken from U.S. EPA AP-42 "Compilation of Air Pollutant Emission Factors", Section 1.4, Natural Gas Combustion in the following equation:

$$(\text{MM scf/hour})(\text{lb/MMscf}) = \text{lb/hr CO}$$

If required by the Ohio EPA or Cleveland DAQ, compliance with the above hourly carbon monoxide emission limitation can be determined by Methods 1-4 and Method 10 of 40 CFR Part 60, Appendix A.

f. Emission Limitation:

Carbon monoxide emissions shall not exceed 2.58 TPY.

Applicable Compliance Method:

The annual emission limitation was determined by multiplying the hourly emission limitation by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pound per hour limitation.

g. Emission Limitation:

Organic compound emissions shall not exceed 1.17 lb/hr.

Applicable Compliance Method:

The above emission limit was established from the most recent stack test conducted on July 18, 1995 and is the most recent test as of the effective date of this permit.

If required by the Ohio EPA or Cleveland DAQ, compliance with the above hourly organic compound emission limitation can be determined by Methods 1-4 and Method 25 of 40 CFR, Part 60, Appendix A.

h. Emission Limitation:

Organic compound emissions shall not exceed 5.12 TPY

Applicable Compliance Method:

The annual emission limitation was determined by multiplying the hourly emission limitation by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pound per hour limitation.

i. Emission Limitation:

Sulfur dioxide emissions shall not exceed 0.01 lb/hr.

Applicable Compliance Method:

To determine compliance, use the emission factor (EF) for SO<sub>2</sub> (0.6 lb/MM scf) taken from US EPA AP-42 "Compilation of Air Pollutant Emission Factors" Section 1.4, Natural Gas Combustion, in the following equation:

$$(\text{MM scf/hr})(\text{lb/MMscf}) = \text{lb/hr SO}_2$$

If required by the Ohio EPA or Cleveland DAQ, compliance with the above hourly organic compound emission limitation can be determined by Methods 1-4 and Method 6 of 40 CFR, Part 60, Appendix A.

j. Emission Limitation:

Sulfur dioxide emissions shall not exceed 0.04 TPY.

Applicable Compliance Method:

The annual emission limitation was determined by multiplying the hourly emission limitation by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pound per hour limitation.

k. Emission Limitation:

Nitrogen oxide emissions shall not exceed 0.7 lb/hr.

Applicable Compliance Method:

To determine compliance, use the emission factor (EF) for NO<sub>x</sub>(100 lbs/mm scf) taken from U.S. EPA AP-42 "Compilation of Air Pollutant Emission Factors" Section 1.4, Natural Gas Combustion, in the following equation:

$$(MM \text{ scf/hr})(\text{lb/MMscf}) = \text{lb/hrNO}_x$$

If required, by Ohio EPA or Cleveland DAQ, compliance with the above hourly nitrogen oxide limitation shall be determined by Methods 1-4 and Method 7 of 40 CFR Part 60, Appendix A.

l. Emission Limitation:

Nitrogen oxide emissions shall not exceed 3.1 TPY

Applicable Compliance Method:

The annual emission limitation was determined by multiplying the hourly emission limitation by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pound per hour limitation.

m. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed ten percent opacity, as a six-minute average, except as provided by this rule; and visible emissions from fugitive dust shall not exceed twenty percent as a three-minute average.

Applicable Compliance Method

If required, compliance with the stack and fugitive visible emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

- (2) The permittee shall conduct, or have conducted, emission testing for one of the following similar emissions units: P002, P014, P015, and P016.

The permittee shall test one of these units to fulfill this requirement. After one of these units is stack tested, the other emissions unit may be stack tested in the next required stack test cycle.

The testing shall be done in accordance with the requirements outlined in Section C.2.f)(2) for emissions unit P002.

- g) Miscellaneous Requirements
  - (1) None.



10. P017, Patenting Furnace, P-2

Operations, Property and/or Equipment Description:

A 9.3 MMBTU natural gas fired patenting furnace for heat treating steel wires.

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

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

a. None.

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

a. 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) (PTI 13-3310 issued 3/11/1998)	PM/PM <sub>10</sub> emissions shall not exceed 2.0 lbs/hour and 8.76 TPY from this emissions unit.  Lead emissions shall not exceed 0.1 lb/hr and 0.44 TPY from this emissions unit.  See b)(2)a. below.
b.	OAC rule 3745-17-07(B)	The visible emission of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
c.	OAC rule 3745-17-08(B)	Reasonably available control measures (RACM) must be employed to sufficiently minimize or eliminate visible emissions of fugitive dust.  See b)(2)b. below.

- (2) Additional Terms and Conditions
- a. The permittee shall not operate this emissions unit without a complete, minimum of four-inch thick, pea coke/graphite layer above the molten lead for the control of lead and particulate emissions from this emissions unit.
  - b. The permittee shall employ reasonably available control measures that shall include, but are not limited to the use of a four inch-thick layer of pea coke/graphite above the molten lead. The layer of pea coke/graphite shall adequately minimize or eliminate lead and particulate emissions from this emissions unit.
- c) Operational Restrictions
- (1) The permittee shall burn only natural gas in this emissions unit.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain records of the purchase orders for graphite and pea coke used to replenish the emissions suppression layer above the lead bath.
  - (2) The permittee shall maintain records of the maintenance performed on this emissions unit to demonstrate that the emissions unit remains in proper operational order.
  - (3) The permittee shall maintain records of the replenishment of the pea coke and graphite covering (i.e. amount added and date).
  - (4) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
  - (5) The permittee shall perform daily checks, then 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 roof monitors which use fans to draw air out of the building) 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 location and color of the emissions;
    - b. the total duration of any visible emissions incident; and
    - c. any corrective actions taken to eliminate the visible emissions.
  - (6) The visible emission checks may be performed in person or using the facility's color video surveillance system. When using the video surveillance system, the permittee shall ensure that the video surveillance system is able to clearly view all the fugitive egress points (i.e., building roof monitors) serving this emissions unit.

## e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions:
  - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building roof monitors) serving this emissions unit; and
  - b. any corrective actions taken to eliminate the visible emissions of fugitive dust.

## f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
PM/PM<sub>10</sub> emissions shall not exceed 2.0 lbs/hour total from this emissions unit.  
Applicable Compliance Method:  
If required, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(1).
  - b. Emission Limitation:  
PM/PM<sub>10</sub> emissions shall not exceed 8.76 TPY from this emissions unit.  
Applicable Compliance Method:  
The annual emission limitation was established by multiplying the hourly emissions limitation by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emissions limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.
  - c. Emission Limitation:  
Lead emissions shall not exceed 0.1 lb/hour.

Applicable Compliance Method:

If required, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, Method 12 and the procedures specified in OAC rule 3745-17-03(B)(1).

d. Emission Limitation:

Lead emissions shall not exceed 0.44 TPY.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emissions limitation by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pound per hour limitation.

e. Emission Limitation:

Visible emissions from fugitive dust shall not exceed twenty percent as a three-minute average.

Applicable Compliance Method:

If required, compliance with the fugitive visible emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.