Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

5/11/2012

Pamela Blakley *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.

Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Jewel Acquisition, LLC. - Louisville Facility
Facility ID: 1576000378
Permit Type: Renewal
Permit Number: P0107325

Dear Ms. Blakley:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.ohio.gov/dapc in Microsoft Word and Adobe Acrobat format. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Canton City Health Department

50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

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Ohio | Environmental Protection Agency

PROPOSED

Division of Air Pollution Control
Title V Permit
for
Jewel Acquisition, LLC. - Louisville Facility

Facility ID:	1576000378
Permit Number:	P0107325
Permit Type:	Renewal
Issued:	5/11/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Jewel Acquisition, LLC. - Louisville Facility

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Authorization

Facility ID: 1576000378
Facility Description: Stainless metals manufacturer.
Application Number(s): A0032699, A0032700, A0032701, A0032702, A0039598
Permit Number: P0107325
Permit Description: Title V Permit Renewal for facility manufacturing rolled steel series/types 300, 400, Titanium and other steel shape manufacturing with cold and hot finishing in acid pickling tanks, including several annealling furnaces and shot blaster.
Permit Type: Renewal
Issue Date: 5/11/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0100947

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Jewel Acquisition, LLC. - Louisville Facility
1500 West Main Street
Louisville, OH 44641

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

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Canton City Health Department. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Canton City Health Department.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

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

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

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

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

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

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

Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(1) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

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

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

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

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

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

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

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

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

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

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

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

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

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

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

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

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

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

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

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

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

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

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

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

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

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

(2) Compliance certifications shall include the following:

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

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

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

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

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

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

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

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

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

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

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

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

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

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

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

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

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

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

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

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

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

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

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

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

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

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

25. Records Retention RequirementsUnder State Law Only

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

26. Inspections and Information Requests

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

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting

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

28. Permit Transfers

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

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. The following insignificant emissions units at this facility must comply with all applicable State and Federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21.

a) G001 – L-20 gasoline dispensing facility, VB-1, 2,000 gallon storage tank, and L-26 diesel storage tank, 2,000 gallon (PTI 15-344)

b) P026 – Bright Anneal (BA) Furnace: Five (5) zone natural gas-fired bright anneal (BA) muffler (radiant) furnaces, dryer #1, serial no. S-5995, for stainless steel coil strips, 12.5 tph maximum; rated at 14.7 MMBtu/hr, with low NOx burners (PTI 15-1269)

3. Pursuant to 40 CFR Part 64, the permittee has submitted and the Ohio EPA has approved Compliance Assurance Monitoring (CAM) plans for emissions units P009 and P019 at this facility, subject to verification of CAM Plan indicator ranges through scheduled emission testing. The permittee shall comply with the provisions of the CAM plans during any operation of the aforementioned emissions units.

4. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

C. Emissions Unit Terms and Conditions

1. F002, Vehicular traffic

Operations, Property and/or Equipment Description:

Fugitive dust from plant-wide vehicular traffic on roadways and parking areas: Approximately 1.5 miles of paved roadways and 323,284 square feet of paved parking areas used by vehicles with 4 to 18 wheels.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)(4)	There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six (6) minutes during any sixty-minute observation period.
b.	OAC rule 3745-17-08(B)(8)	Reasonably available control measures See b)(2)b. through (2)e. below.

(2) Additional Terms and Conditions

a. The paved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

<u>paved roadway areas:</u>

asphalt 1.5 miles

<u>parking area identification:</u>	<u>approx. area (sq. ft.)</u>
A. asphalt	155,509
B. asphalt	57,150
C. asphalt	70,425

D. asphalt	27,000
E. asphalt	12,200

b. All paved roadways and parking areas shall be flushed with water to minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitation.

c. The permittee shall promptly remove, in such a manner as to minimize or prevent re-suspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

d. The control measures shall be implemented at frequencies that will minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and ensure compliance with the above-mentioned visible emission limitations, and the needed frequencies of implementation shall be determined by the permittee's inspections. It is further understood that on any specific day implementation of the control measures shall not be necessary for a paved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to minimize or eliminate visible above-mentioned visible emission limitations.

e. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary to minimize or eliminate visible emissions of fugitive dust.

[Authority for Term: OAC rule 3745-17-08(B)(8), and OAC rule 3745-77-07(C)(1)]

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

roadway and parking areas:	minimum inspection frequency:
Paved roadways	weekly
Paved and unpaved parking areas	monthly

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The purpose of the inspections is to determine the need for implementing the control measures specified in section b)(2) above. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice, if precipitation has occurred that is sufficient for that day to minimize or eliminate visible emissions of fugitive dust

generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitations. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) The information required in d)(3)d. for the paved roadways and parking areas shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:

a. Each day during which an inspection was not performed at the required frequency, excluding an inspection that was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. Each instance when a control measure that was to be implemented as a result of an inspection was not implemented.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03]

(2) All reports (including semi-annual deviation reports) shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03]

f) Testing Requirements

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

a. Emission Limitations:

There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six (6) minutes during any 60-minute observation period.

Applicable Compliance Method:

Compliance shall be demonstrated using USEPA Method 22 of 40 CFR Part 60, Appendix A, and the modifications listed in Section (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03. The visible emission limitation applies to each separate road segment and/or parking area identified in section b)(2)a.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

2. P005, #2 HAP - Pickle Tanks

Operations, Property and/or Equipment Description:

#2 Hot Anneal & Pickle (HAP) Line, 26 TPH, Pickling Tanks #1, #2, #3 equipped with Ceilcote acid fume packed-bed wet caustic scrubber.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11	Particulate emissions (PE) shall not exceed 4.70 lbs/hr based on Figure II. See b)(2)a. below.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(A)(2)	The presence of water vapor in the scrubber plume does not constitute visible emissions.

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to the acid fume packed-bed caustic wet scrubber at all times the emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

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

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall perform quarterly inspections, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. Visible emissions shall be read by a certified USEPA Method 9 observer using USEPA Method 9. The quarterly inspections shall be conducted when this emissions unit is operating, and to the extent possible in a scenario when the maximum emissions are generated. If visible emissions are observed, the permittee shall also note the following in the operating log:

a. the operating conditions (production rate, product, steel type) during the observation period;

b. the color of the emissions;

c. the percent opacity of the particulate emissions;

d. if the emissions exceed the allowable opacity limitations, the cause of the abnormal emissions, if able to ascertain;

e. the total duration of any emission incident exceeding the allowable opacity limitations; and

f. any corrective actions taken to eliminate or minimize the visible emissions to levels below the allowable opacity limitations.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

(3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range for the pressure drop across the scrubber shall be maintained between 1.00 to 7.00 inches of water. Scrubber operating parameters shall be re-verified through periodic emission testing or as a result of changes to the operating conditions of the scrubber or emissions unit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

(4) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable scrubber liquid flow rate shall not be less than 225 gallons per minute. Scrubber operating parameters shall be re-verified through periodic emission testing or as a result of changes to the operating conditions of the scrubber or emissions unit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

(5) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range for the pH of the scrubber liquid shall be within the range established during a compliance test or recommended by the scrubber manufacturer, and shall be maintained between 7.0 and 12.0. Scrubber operating parameters shall be re-verified through periodic emission testing or as a result of changes to the operating conditions of the scrubber or emissions unit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

(6) The permittee shall properly install, operate and maintain equipment to continuously monitor the pressure drop across the scrubber (in inches of water), the scrubber liquid flow rate (in gallons per minute), and the scrubber liquid pH during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber, the scrubber liquid flow rate and liquid pH on a daily basis. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s), with any modifications deemed necessary by the permittee subject to approval by the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

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(s) the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

a. a description of the corrective action ;

b. the date the corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop, flow rate, and pH readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

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

These range(s) and/or limit(s) for the pressure drop, liquid flow rate, and liquid pH are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Canton City Health Department, Air Pollution Control Division. The permittee may request revisions to the permitted range or limit for the pressure drop, liquid flow rate, or liquid pH based upon information obtained during future performance tests that demonstrate compliance with the allowable emissions limitations 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 a minor permit modification.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following at a minimum:

a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber, the scrubber liquid flow rate, or the scrubber liquid pH was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;

b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber;

c. all days during which any abnormal visible particulate/acid fume emissions (VEs) were observed from the stack serving this emissions unit per d)(1), and describe any corrective actions taken to minimize or eliminate the abnormal visible particulate emissions;

d. each incident of deviation described in “a”, “b” or “c” (above) where a prompt investigation was not conducted;

e. each incident of deviation described in “a”, “b” or “c” (above) where prompt corrective action that would bring the pressure drop, liquid flow rate, liquid pH and/or VEs into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and

f. each incident of deviation described in “a”, “b” or “c” (above) where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

(2) All reports (including semi-annual deviation reports) shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03]

(f) Testing Requirements

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

a. <u>Emission Limitation</u>:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be demonstrated using USEPA Method 9 pursuant to OAC rule 3745-17-03(B)(1).

[Authority for Term: OAC rule 3745-17-03(B)(1)(a) and rule 3745-77-07(C)(1)]

b. Emission Limitation:

PE shall not exceed 4.70 lbs/hr.

Applicable Compliance Method:

Compliance with the lbs/hr emission limitation shall be based on emissions testing specified in section f)(2) using 40 CFR Part 60, Appendix A, Methods 1–5.

[Authority for Term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1)]

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

a. The compliance emission testing shall be conducted within 12 months of the issuance of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable emissions limitations in section b)(1) at the scrubber stack serving this emissions unit.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate and visible emission limitation:

i. for particulate emissions (PE):

40 CFR Part 60, Appendix A, Methods 1-5, and the procedures specified in OAC 3745-17-03(B)(10).

ii. for stack visible emissions (VEs):

40 CFR Part 60, Appendix A, Method 9, concurrent with emission testing.

d. The test(s) shall be conducted while the emissions unit is operating at worst case scenario conditions to produce the maximum emissions, including maximum NOx emissions. The worst case scenario operating conditions are when the emission unit is operating at or near the maximum line speed for the material processed (maximum rate = 26 TPH) and processing the material in worst case exothermic reaction conditions (possible condition: recirculation pickling temperatures above 140 degrees F in tank #3 with HNO_3 and HF acids). All worst case scenario conditions shall be specified for approval by the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) prior to testing.

e. Monitoring and recording of the scrubber operating parameters specified in terms d)(3), d)(4), and d)(5) above shall be conducted at 15 minute intervals during the duration of the test(s). Hourly averages of the readings shall be used to establish and/or re-verify the parameter ranges or minimum limits specified in those terms.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CCHD, APCD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the proposed emissions measurement details, the emissions control device operating parameters being monitored, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Sample performance test operating data log sheets for recording of the compliance test data shall be attached to the ITT for review. Failure to submit such notification for review and approval prior to the test(s) may result in the CCHD, APCD's refusal to accept the results of the emission test(s).

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

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

[Authority for Term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall conduct emission testing per 40 CFR Part 60, Appendix A, Method 202 to quantify condensable particulate matter emissions. This testing shall be conducted concurrently with the emission testing required in section (2) above and comply with the requirements in (2)d.-h. above.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

f) Miscellaneous Requirements

(1) None.

3. P009, #2 HAP - Shot Blaster

Operations, Property and/or Equipment Description:

#2 Hot Anneal & Pickle (HAP) Line, 26 TPH, 8 head shot blaster with dampered exhaust to one of two alternative baghouses; P009 Wheelabratorbaghouse, or P025 Pangbornbaghouse. P025 Pangbornbaghouse was retained from the now shutdown emissions unit P025, #1 HAP, 4 head shot blaster, and operates as an alternative backup control device for the P009 Wheelabratorbaghouse.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11	20.1 lbs/hr of particulate emissions See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2), c)(1), d)(1) through d)(6) and e)(1).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented at all times when in operation to one of two (2) alternative baghouses, either:

i. the East “3-compartment” Wheelabrator L-10191 baghouse, company ID P009, or

ii. the West “1-compartment” Pangborn L-10192 baghouse, company ID P025.

[Authority for Term: OAC rule 3745-77-07(A) and 40 CFR Part 64]

c) Operational Restrictions

(1) In order to maintain compliance with the applicable emissions limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse compartment(s) is between 1.0 to 7.0 inches of water. Performance testing will be used to demonstrate compliance with the particulate emissions limitation and establish this range as acceptable.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.3]

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for particulate emissions are:

a. the daily inspections for visible emissions from the baghouse exhaust stack; and

b. the daily inspection of the pressure drop across the baghousecompartment(s).

The CAM performance indicator values were established in accordance with the facility recommendations and are being verified during particulate emissions testing. When any of the above performance indicators are operating outside of the indicator values, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and to comply with the reporting requirements specified in e) below.

The operating pressure drop across the baghouse compartment(s) shall be re-verified through periodic emission testing or as a result of changes to the operating conditions of the baghouse or emissions unit. In addition to visible emission monitoring and periodic monitoring of the baghouse operating parameters, the permittee shall also have an Operations, Monitoring and Maintenance (OM&M) Plan for the baghouse and capture system. Based on the results of the inspection/preventative maintenance program, repairs to the baghouse and capture system shall be made as needed. If the current CAM indicators and/or the baghouse and capture system inspection/preventative maintenance program are considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.3(a), 40 CFR Part 64.6(c), 40 CFR Part 64.7(d), and 40 CFR Part 64.8]

(2) The permittee shall maintain necessary parts for routine repairs of the monitoring equipment.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7(b)]

(3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an

operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.6(c)]

(4) The permittee shall perform quarterly inspections, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. Visible emissions shall be read by a certified USEPA Method 9 observer using USEPA Method 9. The quarterly inspections shall be conducted when this emissions unit is operating, and to the extent possible in a scenario when the maximum emissions are generated. If visible emissions are observed, the permittee shall also note the following in the operating log:

a. the operating conditions (production rate, product, steel type) during the observation period;

b. the color of the emissions;

c. the percent opacity of the particulate emissions;

d. if the emissions exceed the allowable opacity limitations, the cause of the abnormal emissions, if able to ascertain;

e. the total duration of any emission incident exceeding the allowable opacity limitations; and

f. any corrective actions taken to eliminate or minimize the visible emissions to levels below the allowable opacity limitations.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(5) The permittee shall properly install, operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse compartment(s) when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse compartment(s) on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee subject to approval by the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.3, 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

(6) The permittee shall maintain a supply of bags or any other parts necessary to ensure that the collection/control system will operate properly. Any worn, clogged, or broken equipment should be replaced or fixed within a reasonable timeframe.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation reports that identify the following information, at a minimum, concerning the operation of the baghouse during the operation of the emissions unit:

a. each period of time (start time and date and end time and date) when the pressure drop across the baghouse compartment(s) was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

c. all days during which any abnormal visible particulate emissions (VEs) were observed from the stack serving this emissions unit per d)(3), and describe any corrective actions taken to minimize or eliminate the abnormal visible emissions;

d. each incident of deviation described in “a” through “c” (above) where a prompt investigation was not conducted;

e. each incident of deviation described in "a" through "c" (above) where prompt corrective action that would bring the pressure drop or opacity into compliance with the acceptable range was determined to be necessary and was not taken; and

f. each incident of deviation described in "a" through "c" (above) where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

[Authority for Term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-77-07(C)(1), and 40 CFR Part 64.9(a)]

(2) All reports (including semi-annual deviation reports) shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03]

f) Testing Requirements

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

a. Emission Limitation:

20.1 lbs/hr particulate emissions

Applicable Compliance Method:

Compliance with the lbs/hr emissions limitation shall be based on the emissions testing specified in section f)(2) using Methods 1 through 5 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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

[Authority for Term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

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

a. The compliance emission testing shall be conducted within 12 months of the issuance of this permit.

b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate and visible emission limitation:

   i. For particulate emissions:

      40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(10).

   ii. For stack visible emission (VE):

      40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), concurrently with emission testing.

c. Pressure drop indicator readings across the baghouse compartment(s) shall be monitored and recorded during the emissions test to verify the acceptable pressure drop range of operation. Compliance with the section c) pressure drop operational restriction shall be based upon an hourly average of these CAM performance indicator readings recorded every 15 minutes during performance compliance testing.

d. The tests shall be conducted while the emission unit, P009 shot blaster, is operating at or near its maximum capacity of 26 TPH finished steel coil, and during worst case scenario conditions as specified for approval by the CCHD, APCD prior to testing.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an “Intent to Test” notification to the CCHD, APCD. The “Intent to Test” notification shall describe in detail the proposed test methods and procedures, the proposed emissions measurement details, the emissions control device operating parameters being monitored, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Sample performance test operating data log sheets for recording of the compliance test data shall be attached to the ITT for review. Failure to submit such notification for review and approval prior to the test(s) may result in the CCHD, APCD’s refusal to accept the results of the emission test(s).

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

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

[Authority for Term: OAC rule 3745-17-03(B)(1), OAC rule 3745-17-03(B)(10), and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

4. P019, #2 CAP - Pickle Tanks

Operations, Property and/or Equipment Description:

#2 Cold Anneal & Pickle (CAP) Line, 44 TPH maximum, Pickling Tanks #1, #2, and #3; Tank #2 was modified to include a NOx control system which injects variable hydrogen peroxide (H_2O_2) feed rates to control emissions of NOx at or below 200 ppm at the combined tanks vent for the different types of steel processed; additionally, a Ceilcote packed-bed cross-flow water wash wet scrubber, L-11080, is used to control condensable particulate matter (CPM) from nitric, sulfuric & hydrofluoric acid fumes emissions. Production line speed is 200 fpm maximum.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 15-01478 modification issued 02/19/2002)	Nitrogen oxides (NOx) emissions shall not exceed 16.68 lbs/hr and 73.06 tpy. Primary PE/PM_{10} [filterable and condensable particulate matter (CPM) including solids, liquids, & acid fumes] emissions shall not exceed 1.53 lbs/hr and 6.70 tpy. See b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11.
b.	OAC rule 3745-17-11	The lb/hr emission limitation established pursuant to this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 percent opacity as a six minute average, except as provided by rule.

d.	OAC rule 3745-17-07(A)(2)	The presence of water vapor in the scrubber plume does not constitute visible emissions.
e.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2), c)(1) through c)(4), d)(1) through d)(6), e)(1) and (2) and f)(1) and (2).

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to the wet scrubber at all times the emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1), PTI 15-01478 and 40 CFR Part 64]

c) Operational Restrictions

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range for the pressure drop across the scrubber shall be between 0.5 to 5.0 inches of water. Compliance with this operational restriction shall be based upon an hourly average measured during a performance stack test.

[Authority for Term: OAC rule 3745-77-07(A)(1), PTI 15-01478 and 40 CFR Part 64.3(a)(2)]

(2) The scrubber liquid flow rate shall be continuously maintained at a level that is not less than 225 gallons per minute. Compliance with this operational restriction shall be based on an hourly averagemeasured during a performance stack test.

[Authority for Term: OAC rule 3745-77-07(A)(1), PTI 15-01478 and 40 CFR Part 64.3(a)(2)]

(3) For primary NOx control, the hydrogen peroxide (H_2O_2) injection feed rate into the acid pickling line tank #2 recirculation line shall be continuously maintained at:

a. not less than 4.0 gallons per hour (gph) for 200, 300, and 600 steel series* products;

b. not less than 25.0 gallons per hour (gph) for 400 steel series products; and

c. not less than 15.0 gallons per hour (gph) for titanium products;

which were/are established during performance stack testing.

*Note: Steel series refers to a series of steel, for example 300 series stainless steel. A steel series consists of various steel types or grades, for example 301, 302, 303, 304, etc., steel types/grades. Steel series should not be confused with steel type/grade when complying with this term.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.3(a)(2)]

(4) Annual steel pickling production rate from emissions unit P019 shall not exceed 180,000 tons per year, based on a rolling, 12-month summation of the monthly pickling steel production rates.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 15-01478]

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for nitrogen oxides (NOx) emissions. The CAM performance indicators for NOx emissions are:

a. the daily checks for visible emissions as described in d)(4) below;

b. the daily recording of the pressure drop readings across the scrubber;

c. the daily recording the scrubber liquid flow rate measurements; and

d. the daily recording of the hydrogen peroxide (H_2O_2) injection feed rate into the acid pickling tank # 2 for the specific product being processed, in which the feed rate is automatically adjusted to the proper rate depending on the product being processed.

The CAM performance indicator values were established in accordance with the PTI 15-01478 application "Determination of Potential-to-Emit from the Proposed No. 2 CAP" recommendations which states the permittee shall "inject sufficient hydrogen peroxide into No. 2 pickle tank such that concentration of NOx in the combined vent streams of the three pickle tanks will be controlled at 200 ppm." The quantity of NOx to be released to the atmosphere follows formulas from AP-42 methodology (see f)(1)b.) with the combined vent rate for the three pickle tanks that was established during the emission test conducted in November 2000 of 12,755 DSCFM, in which the No. 2 CAP expansion project was not to change that vent rate. The vent rate and NOx concentration performance indicators will be validated and verified during subsequent performance testing to ensure compliance.

When any of the above performance indicators are outside of the indicator ranges, the permittee shall take corrective action to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions and to comply with the reporting requirements specified in section e) below.

Scrubber operating parameters shall be re-verified through periodic emission testing or as a result of changes to the operating conditions of the scrubber or emissions unit. In addition to visible emissions monitoring and periodic monitoring of the scrubber operating parameters and the H_2O_2 injection feed rates, the permittee shall also have an Operations, Monitoring & Maintenance (OM&M) Plan for the scrubber and the H_2O_2 injection NOx control systems. Based on the results of the inspection and preventative maintenance program, repairs to the scrubber and the H_2O_2 injection NOx control system shall be made as needed. If the current CAM performance indicators for the

scrubber control or the hydrogen peroxide injection NOx control systems are considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 15-01478, 40 CFR Part 64.3(a), 40 CFR Part 64.6(c), 40 CFR Part 64.7(d), and 40 CFR Part 64.8]

(2) The permittee shall maintain necessary parts for routine repairs of the monitoring equipment.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7(b)]

(3) The permittee shall properly install, operate and maintain equipment to continuously monitor the pressure drop across the scrubber (in inches of water), the scrubber liquid flow rate (in gallons per minute), and the hydrogen peroxide (H_2O_2) injection feed rate (in gallons per hour) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber, the scrubber liquid flow rate, and the hydrogen peroxide injection feed rateon a daily basis. The permittee shall operate an automatic alarm system for when the hydrogen peroxide injection feed rate is below the setpoint in the automatic control system. The alarms shall be recorded if the hydrogen peroxide injection feed rate is below the limits listed in c)(3).

The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee subject to approval by the Canton City Health Department, Air Pollution Control Division (CCHD, APCD), and/or as established by reference to previous stack testing conditions.

Whenever the monitored value of 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(s) the investigation was conducted;

d. the names of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date the corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the scrubber pressure drop, the scrubber liquid flow rate, and the hydrogen peroxide injection feed rate readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

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

These limit(s) for the scrubber pressure drop, scrubber liquid flow rate and hydrogen peroxide injection feed rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Canton City Health Department, Air Pollution Control Division. The permittee may request revisions to the limit(s) based upon information obtained during future performance tests that demonstrate compliance with the allowable NOx emissions rate 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 a minor permit modification.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 15-01478, 40 CFR Part 64.7(c), 40 CFR Part 64.9(b) and 40 CFR Part 64.3]

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

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d. above or continue the daily check until the incident has ended.

The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 15-01478, and 40 CFR Part 64.6(c)]

(5) The permittee shall perform quarterly inspections, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. Visible emissions shall be read by a certified USEPA Method 9 observer using USEPA Method 9. The quarterly inspections shall be conducted when this emissions unit is operating, and to the extent possible in a scenario when the maximum emissions are generated. If visible emissions are observed, the permittee shall also note the following in the operating log:

a. the operating conditions (production rate, product, steel type) during the observation period;

b. the color of the emissions;

c. the percent opacity of the particulate emissions;

d. if the emissions exceed the allowable opacity limitations, the cause of the abnormal emissions, if able to ascertain;

e. the total duration of any emission incident exceeding the allowable opacity limitations; and

f. any corrective actions taken to eliminate or minimize the visible emissions to levels below the allowable opacity limitations.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 15-01478 and 40 CFR Part 64]

(6) The permittee shall maintain monthly records of the following information:

a. a monthly log or record of daily operating hours for the capture (collection) system, control device, monitoring equipment, and associated emissions unit.

b. steel pickling production rate in tons per month; and

c. the rolling, 12-month summation in tons of the monthly steel pickling production rates.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 15-01478, and 40 CFR Part 64.6(c)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following information, at a minimum, concerning the operation of the control equipment during the operation of this emissions unit.

a. each period of time (start time and date, and end time and date) when the scrubber pressure drop was outside the acceptable range;

b. each period of time (start time and date, and end time and date) when the scrubber liquid flow rate was below the acceptable value;

c. each period of time (start time and date, and end time and date) when the hydrogen peroxide (H_2O_2) injection feed rate was not maintained at or above the required level for the products being processed;

d. all days during which any abnormal visible particulate emissions (VEs) were observed from the stack serving this emissions unit per d)(4), and describe any corrective actions taken to minimize or eliminate the abnormal visible emissions;

e. each exceedance of the maximum allowable, rolling, 12-month steel pickling production limitation;

f. each incident of deviation described in “a” through “d” (above) where a prompt investigation was not conducted;

g. each incident of deviation described in “a” through “d” (above) where prompt corrective action that would bring the scrubber pressure drop, the scrubber liquid flow rate, hydrogen peroxide (H_2O_2) injection feed rate, and/or visible emissions (VEs) limitation into compliance with the acceptable value, was determined to be necessary and was not taken; and

h. each incident of deviation described in “a” through “d” (above) where proper records were not maintained for the investigation and/or the corrective action.

[Authority for Term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-77-07(C)(1), PTI 15-01478, and 40 CFR Part 64.9(a)]

(2) All reports (including semi-annual deviation reports) shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03]

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be demonstrated using USEPA Method 9 pursuant to OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

The nitrogen oxide (NOx) emissions shall not exceed 16.68 lbs/hr and 73.06 tpy.

Applicable Compliance Method:

Compliance with the 16.68 lbs/hr emission limitation shall be based on the emission testing methods specified in section f)(2).

The hourly emission limitation was established by using the following equation:

$E = (C*M*Q / 385.3x10^6)*(60 \text{ min/hr})$

Where

E = the emission rate in lbNOx / hr
M = the molecular weight of NO2 which is equal to 42
C = the NOx concentration of the outlet of the hydrogen peroxide injection system, which has a maximum concentration of 200 ppm
Q = the combined vent rate of the pickle tanks which is set equal to the measured vent rate during the November 2000 emission test of 12,755 DSCFM

$E = (200 * 42 * 12755 / 385.3x10^6)*60 = 16.68$ lbsNOx/hr

The annual limit was established by using on the following equation:
16.68 lbs/hr x 8,760 hrs/yr x 1 ton/2,000 lbs

c. Emission Limitation:

Primary PE/PM_{10} [filterable and condensable particulate matter (CPM) including solids, liquids, & acid fumes] emissions shall not exceed 1.53 lbs/hr and 6.70 tpy.

Applicable Compliance Method:

Compliance with the lbs/hr emissions limitation shall be based on the emissions testing specified in section f)(2).

The annual limit was established by using the following equation:
1.53 lbs/hr x 8,760 hrs/yr x 1 ton/2,000 lbs

[Authority for Term: OAC rule 3745-17-03(B)(10), OAC rule 3745-77-07(C)(1), PTI 15-01478 and 40 CFR Part 64]

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

a. The compliance emission testing shall be conducted within 12 months of the issuance of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable emissions limitations section b), and the operational restriction CAM performance indicators in section c) at the scrubber stack serving this emissions unit.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rates:

i. for primary PE/PM_{10} [filterable and condensable particulate matter (CPM) including solids, liquids, & acid fumes] emissions:

40 CFR Part 60, Appendix A, Methods 1-5, Method 202, and the procedures specified in OAC rule 3745-17-03(B)(10). To quantify acid concentrations of HF/HNO_3/H_2SO_4, use Method 7903 of the OSHA/NIOSH with Ohio EPA approval.

ii. for NOx emissions:

40 CFR Part 60, Appendix A, Method 7E.

iii. for visible emissions (VEs):

40 CFR Part 60, Appendix A, Method 9, concurrent with emission test.

d. The test(s) shall be conducted while the emissions unit is operating at worst case scenario conditions to produce the maximum NOx emissions. The worst case scenario operating conditions are when the emission unit is operating at or near the maximum line speed for the material processed (maximum rate = 44 TPH) and processing the material in worst case exothermic reaction conditions (possible condition: recirculation pickling temperatures above 140 degrees F in tank #2 with HNO_3 and HF acids). All worst case scenario conditions shall be specified for approval by the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) prior to testing.

e. Scrubber pressure drop, liquid flow and hydrogen peroxide feed rate will be monitored and recorded during the performance test, and documented in the stack test report. Compliance with these operational restrictions shall be based on hourly averages of these CAM performance indicator readings recorded every 15 minutes during performance compliance testing.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CCHD, APCD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the proposed emissions measurement details, both control device operating parameters to be monitored and recorded, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Sample performance test operating data log sheets for the recording of the compliance test data shall be attached to the ITT for review. Failure to submit such notification for review and approval prior to the test(s) may result in the CCHD, APCD's refusal to accept the results of the emission test(s).

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

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

[Authority for Term: OAC rule 3745-17-03(B)(1), OAC rule 3745-17-03(B)(10), OAC rule 3745-77-07(C)(1), PTI 15-01478 and 40 CFR Part 64]

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group - Annealing Furnaces: P010, P011, P017, P018, P024,

EU ID	Operations, Property and/or Equipment Description
P010	#2 Hot Anneal & Pickle (HAP) Line gas-fired equalizer annealing furnace, 37 MMBtu/hr
P011	#2 Hot Anneal & Pickle (HAP) Line gas-fired preheat annealing furnace, 25.4 MMBtu/hr
P017	#2 Cold Anneal & Pickle (CAP) Line gas-fired preheat annealing furnace #1, 25.7 MMBtu/hr
P018	#2 Cold Anneal & Pickle (CAP) Line gas-fired preheat annealing furnace #2, 28.4 MMBtu/hr
P024	#2 Cold Anneal & Pickle (CAP) Line gas-fired equalizer annealing furnace, 12.2 MMBtu/hr

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11	See b)(2)a.
b.	OAC rule 3745-17-07	See b)(2)b.

(2) Additional Terms and Conditions

a. The steel treated in the annealing furnaces P010, P011, P017, P018, and P024 does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on these emissions units.

b. Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07(A)(3)(h).

c) Operational Restrictions

(1) The permittee shall burn only natural gas in these emissions units.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in these emissions units.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day a fuel other than natural gas was burned in these emissions units. Each report shall be submitted within 30 days after the deviation occurs.

(2) All reports (including quarterly and semi-annual deviation reports) shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03]

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.