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

Certified Mail

10/15/2012

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Jim Flanagan
BABCOCK AND WILCOX - FOUNDRY OPERATIONS
PO Box 351
BARBERTON, OH 44203

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1677020054
Permit Number: P0110909
Permit Type: Administrative Modification
County: Summit

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Akron Beacon Journal. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
ARAQMD; Pennsylvania; West Virginia; Canada

PUBLIC NOTICE
10/15/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

BABCOCK AND WILCOX - FOUNDRY OPERATIONS
600 Ford Avenue West,
Barberton, OH 44203
Summit County
FACILITY DESC.: Iron Foundries
PERMIT #: P0110909
PERMIT TYPE: Administrative Modification
PERMIT DESC: Administrative modification to incorporate federally enforceable permit terms in the current FEPTIO (permit #P0104680, application #A0037263) in accordance with Consent Agreement and Final Order (CAFO) docket number CAA-05-2012-0025, dated May 25, 2012, requiring installation and operation of a bag leak detection system to continuously monitor operation of a new baghouse, common to two electric arc furnaces (emissions units P904 and P905), and establish a site-specific monitoring plan, with associated record keeping and reporting requirements, to ensure compliance for the control of particulate matter emissions from emissions units P904 and P905. This administrative modification does not alter the current FEPTIO synthetic minor potential to emit strategy, nor does it allow for an increase in current permit emission limits.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Russell Risley, Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308. Ph: (330)375-2480

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
BABCOCK AND WILCOX - FOUNDRY OPERATIONS

Facility ID:	1677020054
Permit Number:	P0110909
Permit Type:	Administrative Modification
Issued:	10/15/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio | Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
BABCOCK AND WILCOX - FOUNDRY OPERATIONS

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

1. What does this permit-to-install and operate ("PTIO") allow me to do? 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them? 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 5
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator? 6
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7

B. Facility-Wide Terms and Conditions 8

C. Emissions Unit Terms and Conditions 17

1. Emissions Unit Group - Electric Arc Furnaces: P904, P905 18

Authorization

Facility ID:	1677020054
Application Number(s):	M0001902
Permit Number:	P0110909
Permit Description:	Administrative modification to incorporate federally enforceable permit terms in the current FEPTIO (permit #P0104680, application #A0037263) in accordance with Consent Agreement and Final Order (CAFO) docket number CAA-05-2012-0025, dated May 25, 2012, requiring installation and operation of a bag leak detection system to continuously monitor operation of a new baghouse, common to two electric arc furnaces (emissions units P904 and P905), and establish a site-specific monitoring plan, with associated record keeping and reporting requirements, to ensure compliance for the control of particulate matter emissions from emissions units P904 and P905. This administrative modification does not alter the current FEPTIO synthetic minor potential to emit strategy, nor does it allow for an increase in current permit emission limits.
Permit Type:	Administrative Modification
Permit Fee:	$750.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	10/15/2012
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

BABCOCK AND WILCOX - FOUNDRY OPERATIONS
600 Ford Avenue West
Barberton, OH 44203

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

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

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0110909
Permit Description: Administrative modification to incorporate federally enforceable permit terms in the current FEPTIO (permit #P0104680, application #A0037263) in accordance with Consent Agreement and Final Order (CAFO) docket number CAA-05-2012-0025, dated May 25, 2012, requiring installation and operation of a bag leak detection system to continuously monitor operation of a new baghouse, common to two electric arc furnaces (emissions units P904 and P905), and establish a site-specific monitoring plan, with associated record keeping and reporting requirements, to ensure compliance for the control of particulate matter emissions from emissions units P904 and P905. This administrative modification does not alter the current FEPTIO synthetic minor potential to emit strategy, nor does it allow for an increase in current permit emission limits.

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

Group Name: **Electric Arc Furnaces**

Emissions Unit ID:	**P904**
Company Equipment ID:	SM5111 (North EAF)
Superseded Permit Number:	P0104680
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P905**
Company Equipment ID:	SM8856 (South EAF)
Superseded Permit Number:	P0104680
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.
The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).
The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that

exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.
If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.
You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.
Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63,Subpart ZZZZZ—National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology (GACT) NESHAP applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

3. **40 CFR Part 63, Subpart ZZZZZ Applicability and Compliance Dates:**

   § 63.10880 Applicability (applicable sections for an existing affected source):

   (a) You are subject to this subpart if you own or operate an iron and steel foundry that is an area source of hazardous air pollutant (HAP) emissions.

   (b) This subpart applies to each new or existing affected source. The affected source is each iron and steel foundry.

   (1) An affected source is existing if you commenced construction or reconstruction of the affected source before September 17, 2007.

   (2) An affected source is new if you commenced construction or reconstruction of the affected source on or after September 17, 2007. If an affected source is not new pursuant to the preceding sentence, it is not new as a result of a change in its compliance obligations pursuant to §63.10881(d).

   (c) On and after January 2, 2008, if your iron and steel foundry becomes a major source as defined in §63.2, you must meet the requirements of 40 CFR part 63, subpart EEEEE.

   (d) This subpart does not apply to research and development facilities, as defined in section 112(c)(7) of the Clean Air Act.

   (e) You are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided you are not otherwise required by law to obtain a permit under 40 CFR 70.3(a) or 40 CFR

71.3(a). Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart.

(f) If you own or operate an existing affected source, you must determine the initial applicability of the requirements of this subpart to a small foundry or a large foundry based on your facility's metal melt production for calendar year 2008. If the metal melt production for calendar year 2008 is 20,000 tons or less, your area source is a small foundry. If your metal melt production for calendar year 2008 is greater than 20,000 tons, your area source is a large foundry. You must submit a written notification to the Administrator that identifies your area source as a small foundry or a large foundry no later than January 2, 2009.

§ 63.10881 Compliance Dates (applicable sections for an existing affected source):

(a) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions of this subpart by the dates in paragraphs (a)(1) through (3) of this section.

(1) Not later than January 2, 2009 for the pollution prevention management practices for metallic scrap in §63.10885(a) and binder formulations in §63.10886.

(2) Not later than January 4, 2010 for the pollution prevention management practices for mercury in §63.10885(b).

(3) Except as provided in paragraph (d) of this section, not later than 2 years after the date of your large foundry's notification of the initial determination required in §63.10880(f) for the standards and management practices in §63.10895.

(d) Following the initial determination for an existing affected source required in §63.10880(f),

(1) Beginning January 1, 2010, if the annual metal melt production of your small foundry exceeds 20,000 tons during the preceding calendar year, you must submit a notification of foundry reclassification to the Administrator within 30 days and comply with the requirements in paragraphs (d)(1)(i) or (ii) of this section, as applicable.

(i) If your small foundry has never been classified as a large foundry, you must comply with the requirements for a large foundry no later than 2 years after the date of your foundry's notification that the annual metal melt production exceeded 20,000 tons.

(ii) If your small foundry had previously been classified as a large foundry, you must comply with the requirements for a large foundry no later than the date of your foundry's most recent notification that the annual metal melt production exceeded 20,000 tons.

(2) If your facility is initially classified as a large foundry (or your small foundry subsequently becomes a large foundry), you must comply with the requirements for a large foundry for at least 3 years before reclassifying your facility as a small foundry, even if your annual metal melt production falls below 20,000 tons. After 3 years, you may reclassify your facility as a small foundry provided your annual metal melt production for the preceding calendar year was 20,000 tons or less. If you reclassify your large foundry as a small foundry, you must submit a notification of reclassification to the Administrator within 30 days and comply with the requirements for a small foundry no later than the date you notify the Administrator of the reclassification. If the annual metal melt production exceeds 20,000 tons during

a subsequent year, you must submit a notification of reclassification to the Administrator within 30 days and comply with the requirements for a large foundry no later than the date you notify the Administrator of the reclassification.

4. **40 CFR Part 63, Subpart ZZZZZ Pollution Prevention Management Practices for New and Existing Affected Sources:**

§ 63.10885 Management practices for metallic scrap and mercury switches:

(a) *Metallic scrap management program.* For each segregated metallic scrap storage area, bin or pile, you must comply with the materials acquisition requirements in paragraph (a)(1) or (2) of this section. You must keep a copy of the material specifications onsite and readily available to all personnel with material acquisition duties, and provide a copy to each of your scrap providers. You may have certain scrap subject to paragraph (a)(1) of this section and other scrap subject to paragraph (a)(2) of this section at your facility provided the metallic scrap remains segregated until charge make-up.

(1) *Restricted metallic scrap.* You must prepare and operate at all times according to written material specifications for the purchase and use of only metal ingots, pig iron, slitter, or other materials that do not include post-consumer automotive body scrap, post-consumer engine blocks, post-consumer oil filters, oily turnings, lead components, chlorinated plastics, or free liquids. For the purpose of this subpart, “free liquids” is defined as material that fails the paint filter test by EPA Method 9095B, “Paint Filter Liquids Test” (revision 2), November 2004 (incorporated by reference—see §63.14). The requirements for no free liquids do not apply if the owner or operator can demonstrate that the free liquid is water that resulted from scrap exposure to rain.

(2) *General iron and steel scrap.* You must prepare and operate at all times according to written material specifications for the purchase and use of only iron and steel scrap that has been depleted (to the extent practicable) of organics and HAP metals in the charge materials used by the iron and steel foundry. The materials specifications must include at minimum the information specified in paragraph (a)(2)(i) or (ii) of this section.

(i) Except as provided in paragraph (a)(2)(ii) of this section, specifications for metallic scrap materials charged to a scrap preheater or metal melting furnace to be depleted (to the extent practicable) of the presence of used oil filters, chlorinated plastic parts, accessible lead-containing components (such as batteries and wheel weights), and a program to ensure the scrap materials are drained of free liquids.

(ii) For scrap charged to a cupola metal melting furnace that is equipped with an afterburner, specifications for metallic scrap materials to be depleted (to the extent practicable) of the presence of chlorinated plastics, accessible lead-containing components (such as batteries and wheel weights), and a program to ensure the scrap materials are drained of free liquids.

(b) *Mercury requirements.* For scrap containing motor vehicle scrap, you must procure the scrap pursuant to one of the compliance options in paragraphs (b)(1), (2), or (3) of this section for each scrap provider, contract, or shipment. For scrap that does not contain motor vehicle scrap, you must procure the scrap pursuant to the requirements in paragraph (b)(4) of this section for each scrap provider, contract, or shipment. You may have one scrap provider, contract, or shipment subject to one compliance provision and others subject to another compliance provision.

(1) *Site-specific plan for mercury switches.* You must comply with the requirements in paragraphs (b)(1)(i) through (v) of this section.

(i) You must include a requirement in your scrap specifications for removal of mercury switches from vehicle bodies used to make the scrap.

(ii) You must prepare and operate according to a plan demonstrating how your facility will implement the scrap specification in paragraph (b)(1)(i) of this section for removal of mercury switches. You must submit the plan to the Administrator for approval. You must operate according to the plan as submitted during the review and approval process, operate according to the approved plan at all times after approval, and address any deficiency identified by the Administrator or delegated authority within 60 days following disapproval of a plan. You may request approval to revise the plan and may operate according to the revised plan unless and until the revision is disapproved by the Administrator or delegated authority. The Administrator or delegated authority may change the approval status of the plan upon 90-days written notice based upon the semiannual report or other information. The plan must include:

(A) A means of communicating to scrap purchasers and scrap providers the need to obtain or provide motor vehicle scrap from which mercury switches have been removed and the need to ensure the proper management of the mercury switches removed from the scrap as required under the rules implementing subtitle C of the Resource Conservation and Recovery Act (RCRA) (40 CFR parts 261 through 265 and 268). The plan must include documentation of direction to appropriate staff to communicate to suppliers throughout the scrap supply chain the need to promote the removal of mercury switches from end-of-life vehicles. Upon the request of the Administrator or delegated authority, you must provide examples of materials that are used for outreach to suppliers, such as letters, contract language, policies for purchasing agents, and scrap inspection protocols;

(B) Provisions for obtaining assurance from scrap providers motor vehicle scrap provided to the facility meet the scrap specification;

(C) Provisions for periodic inspections or other means of corroboration to ensure that scrap providers and dismantlers are implementing appropriate steps to minimize the presence of mercury switches in motor vehicle scrap and that the mercury switches removed are being properly managed, including the minimum frequency such means of corroboration will be implemented; and

(D) Provisions for taking corrective actions (i.e., actions resulting in scrap providers removing a higher percentage of mercury switches or other mercury-containing components) if needed, based on the results of procedures implemented in paragraph (b)(1)(ii)(C) of this section).

(iii) You must require each motor vehicle scrap provider to provide an estimate of the number of mercury switches removed from motor vehicle scrap sent to the facility during the previous year and the basis for the estimate. The Administrator may request documentation or additional information at any time.

(iv) You must establish a goal for each scrap supplier to remove at least 80 percent of the mercury switches. Although a site-specific plan approved under paragraph (b)(1) of this section may require only the removal of convenience light switch mechanisms, the Administrator will credit all documented and verifiable mercury-containing components removed from motor vehicle scrap (such as sensors in anti-

locking brake systems, security systems, active ride control, and other applications) when evaluating progress towards the 80 percent goal.

(v) For each scrap provider, you must submit semiannual progress reports to the Administrator that provide the number of mercury switches removed or the weight of mercury recovered from the switches, the estimated number of vehicles processed, an estimate of the percent of mercury switches removed, and certification that the removed mercury switches were recycled at RCRA-permitted facilities or otherwise properly managed pursuant to RCRA subtitle C regulations referenced in paragraph (b)(1)(ii)(A) of this section. This information can be submitted in aggregate form and does not have to be submitted for each shipment. The Administrator may change the approval status of a site-specific plan following 90-days notice based on the progress reports or other information.

(2) *Option for approved mercury programs.* You must certify in your notification of compliance status that you participate in and purchase motor vehicle scrap only from scrap providers who participate in a program for removal of mercury switches that has been approved by the Administrator based on the criteria in paragraphs (b)(2)(i) through (iii) of this section. If you purchase motor vehicle scrap from a broker, you must certify that all scrap received from that broker was obtained from other scrap providers who participate in a program for the removal of mercury switches that has been approved by the Administrator based on the criteria in paragraphs (b)(2)(i) through (iii) of this section. The National Mercury Switch Recovery Program and the State of Maine Mercury Switch Removal Program are EPA-approved programs under paragraph (b)(2) of this section unless and until the Administrator disapproves the program (in part or in whole) under paragraph (b)(2)(iii) of this section.

(i) The program includes outreach that informs the dismantlers of the need for removal of mercury switches and provides training and guidance for removing mercury switches;

(ii) The program has a goal to remove at least 80 percent of mercury switches from motor vehicle scrap the scrap provider processes. Although a program approved under paragraph (b)(2) of this section may require only the removal of convenience light switch mechanisms, the Administrator will credit all documented and verifiable mercury-containing components removed from motor vehicle scrap (such as sensors in anti-locking brake systems, security systems, active ride control, and other applications) when evaluating progress towards the 80 percent goal; and

(iii) The program sponsor agrees to submit progress reports to the Administrator no less frequently than once every year that provide the number of mercury switches removed or the weight of mercury recovered from the switches, the estimated number of vehicles processed, an estimate of the percent of mercury switches recovered, and certification that the recovered mercury switches were recycled at facilities with permits as required under the rules implementing subtitle C of RCRA (40 CFR parts 261 through 265 and 268). The progress reports must be based on a database that includes data for each program participant; however, data may be aggregated at the State level for progress reports that will be publicly available. The Administrator may change the approval status of a program or portion of a program (e.g., at the State level) following 90-days notice based on the progress reports or on other information.

(iv) You must develop and maintain onsite a plan demonstrating the manner through which your facility is participating in the EPA-approved program.

(A) The plan must include facility-specific implementation elements, corporate-wide policies, and/or efforts coordinated by a trade association as appropriate for each facility.

(B) You must provide in the plan documentation of direction to appropriate staff to communicate to suppliers throughout the scrap supply chain the need to promote the removal or mercury switches from end-of-life vehicles. Upon the request of the Administrator or delegated authority, you must provide examples of materials that are used for outreach to suppliers, such as letters, contract language, policies for purchasing agents, and scrap inspection protocols.

(C) You must conduct periodic inspections or other means of corroboration to ensure that scrap providers are aware of the need for and are implementing appropriate steps to minimize the presence of mercury in scrap from end-of-life vehicles.

(3) *Option for specialty metal scrap.* You must certify in your notification of compliance status and maintain records of documentation that the only materials from motor vehicles in the scrap are materials recovered for their specialty alloy (including, but not limited to, chromium, nickel, molybdenum, or other alloys) content (such as certain exhaust systems) and, based on the nature of the scrap and purchase specifications, that the type of scrap is not reasonably expected to contain mercury switches.

(4) *Scrap that does not contain motor vehicle scrap.* For scrap not subject to the requirements in paragraphs (b)(1) through (3) of this section, you must certify in your notification of compliance status and maintain records of documentation that this scrap does not contain motor vehicle scrap.

§ 63.10886 Management practices for binder formulations:

For each furfuryl alcohol warm box mold or core making line at a new or existing iron and steel foundry, you must use a binder chemical formulation that does not use methanol as a specific ingredient of the catalyst formulation. This requirement does not apply to the resin portion of the binder system.

5. **40 CFR Part 63, Subpart ZZZZZ Requirements for New and Existing Affected Sources Classified as Small Foundries:**

§ 63.10890 Management practices and compliance requirements:

(a) You must comply with the pollution prevention management practices for metallic scrap and mercury switches in §63.10885 and binder formulations in §63.10886.

(b) You must submit an initial notification of applicability according to §63.9(b)(2).

(c) You must submit a notification of compliance status according to §63.9(h)(1)(i). You must send the notification of compliance status before the close of business on the 30th day after the applicable compliance date specified in §63.10881. The notification must include the following compliance certifications, as applicable:

(1) “This facility has prepared, and will operate by, written material specifications for metallic scrap according to §63.10885(a)(1)” and/or “This facility has prepared, and will operate by, written material specifications for general iron and steel scrap according to §63.10885(a)(2).”

(2) “This facility has prepared, and will operate by, written material specifications for the removal of mercury switches and a site-specific plan implementing the material specifications according to §63.10885(b)(1) and/or “This facility participates in and purchases motor vehicle scrap only from scrap

providers who participate in a program for removal of mercury switches that has been approved by the Administrator according to §63.10885(b)(2) and has prepared a plan for participation in the EPA-approved program according to §63.10885(b)(2)(iv)" and/or "The only materials from motor vehicles in the scrap charged to a metal melting furnace at this facility are materials recovered for their specialty alloy content in accordance with §63.10885(b)(3) which are not reasonably expected to contain mercury switches" and/or "This facility complies with the requirements for scrap that does not contain motor vehicle scrap in accordance with §63.10885(b)(4)."

(3) "This facility complies with the no methanol requirement for the catalyst portion of each binder chemical formulation for a furfuryl alcohol warm box mold or core making line according to §63.10886."

(d) As required by §63.10(b)(1), you must maintain files of all information (including all reports and notifications) for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

(e) You must maintain records of the information specified in paragraphs (e)(1) through (7) of this section according to the requirements in §63.10(b)(1).

(1) Records supporting your initial notification of applicability and your notification of compliance status according to §63.10(b)(2)(xiv).

(2) Records of your written materials specifications according to §63.10885(a) and records that demonstrate compliance with the requirements for restricted metallic scrap in §63.10885(a)(1) and/or for the use of general scrap in §63.10885(a)(2) and for mercury in §63.10885(b)(1) through (3), as applicable. You must keep records documenting compliance with §63.10885(b)(4) for scrap that does not contain motor vehicle scrap.

(3) If you are subject to the requirements for a site-specific plan for mercury switch removal under §63.10885(b)(1), you must:

(i) Maintain records of the number of mercury switches removed or the weight of mercury recovered from the switches and properly managed, the estimated number of vehicles processed, and an estimate of the percent of mercury switches recovered; and

(ii) Submit semiannual reports of the number of mercury switches removed or the weight of mercury recovered from the switches and properly managed, the estimated number of vehicles processed, an estimate of the percent of mercury switches recovered, and a certification that the recovered mercury switches were recycled at RCRA-permitted facilities. The semiannual reports must include a certification that you have conducted periodic inspections or taken other means of corroboration as required under §63.10885(b)(1)(ii)(C). You must identify which option in paragraph §63.10885(b) applies to each scrap provider, contract, or shipment. You may include this information in the semiannual compliance reports required under paragraph (f) of this section.

(4) If you are subject to the option for approved mercury programs under §63.10885(b)(2), you must maintain records identifying each scrap provider and documenting the scrap provider's participation in an approved mercury switch removal program. If you purchase motor vehicle scrap from a broker, you must maintain records identifying each broker and documentation that all scrap provided by the broker

was obtained from other scrap providers who participate in an approved mercury switch removal program.

(5) Records to document use of binder chemical formulation that does not contain methanol as a specific ingredient of the catalyst formulation for each furfuryl alcohol warm box mold or core making line as required by §63.10886. These records must be the Material Safety Data Sheet (provided that it contains appropriate information), a certified product data sheet, or a manufacturer's hazardous air pollutant data sheet.

(6) Records of the annual quantity and composition of each HAP-containing chemical binder or coating material used to make molds and cores. These records must be copies of purchasing records, Material Safety Data Sheets, or other documentation that provides information on the binder or coating materials used.

(7) Records of metal melt production for each calendar year.

(f) You must submit semiannual compliance reports to the Administrator according to the requirements in §63.10(e). The report must clearly identify any deviation from the pollution prevention management practices in §63.10885 or §63.10886 and the corrective action taken.

(g) You must submit a written notification to the Administrator of the initial classification of your facility as a small foundry as required in §63.10880(f) and (g), as applicable, and for any subsequent reclassification as required in §63.10881(d)(1) or (e), as applicable.

(h) Following the initial determination for an existing affected source as a small foundry, if the annual metal melt production exceeds 20,000 tons during the preceding year, you must comply with the requirements for large foundries by the applicable dates in §63.10881(d)(1)(i) or (d)(1)(ii). Following the initial determination for a new affected source as a small foundry, if you increase the annual metal melt capacity to exceed 10,000 tons, you must comply with the requirements for a large foundry by the applicable dates in §63.10881(e)(1).

(i) You must comply with the following requirements of the General Provisions (40 CFR part 63, subpart A): §§63.1 through 63.5; §63.6(a), (b), (c), and (e)(1); §63.9; §63.10(a), (b)(1), (b)(2)(xiv), (b)(3), (d)(1), (d)(4), and (f); and §§63.13 through 63.16. Requirements of the General Provisions not cited in the preceding sentence do not apply to the owner or operator of a new or existing affected source that is classified as a small foundry.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Electric Arc Furnaces: P904, P905

EU ID	Operations, Property and/or Equipment Description
P904	Gray iron electric arc furnace (north), maximum capacity 3 tons/hour gross melt production (particulate emissions (PE) are stack (emissions vented to and controlled by a baghouse) and fugitive).
P905	Gray iron electric arc furnace (south), maximum capacity 3 tons/hour gross melt production (particulate emissions (PE) are stack (emissions vented to and controlled by a baghouse) and fugitive).

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

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

a. None. See g)(1).

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

a. None. See g)(1).

(3) This administrative modification, requested per application #M0001902, incorporates federally enforceable permit terms in the current FEPTIO (permit #P0104680, application #A0037263) in accordance with Consent Agreement and Final Order docket number CAA-05-2012-0025, dated May 25, 2012 (hereafter called the “CAFO”), requiring installation and operation of a bag leak detection system to continuously monitor operation of a new baghouse, common to two electric arc furnaces (emissions units P904 and P905), and establishment of a site-specific monitoring plan, with associated monitoring, record keeping and reporting requirements, to ensure compliance for the control of particulate emissions from emissions units P904 and P905. This administrative modification does not alter the current FEPTIO synthetic minor potential to emit strategy, nor does it allow for an increase in current permit emission limits.

The federally enforceable conditions established and incorporated in this permit,pursuant to the requirements of the CAFO, are identified below in term b)(2)(d). Other appropriaterequirements for the bag leak detection system, which shall also be federally enforceable,aretaken from Part 63, Subpart ZZZZZ—National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources for a *large foundry*, as defined in § 63.10906, and are identified below in this permit in terms b)(2)(e), c)(4), d)(5) through (8), and e)(6).Per § 63.10906 definition, Babcock & Wilcox Foundry Operations, an existing affected source,is a *small foundry*(metal melt production for calendar year 2008, and for each rolling, 12-month period to present, was less than 20,000 tons),and per definition in §63.2 of Part 63 this facility is not a major source of hazardous air pollutant (HAP) emissions.

Per § 63.10906 definition, *bag leak detection system*means a system that is capable of continuously monitoring relative particulate matter (dust) loadings in the exhaust of a baghouse to detect bag leaks and other upset conditions. A bag leak detection system includes, but is not limited to, an instrument that operates on triboelectric, electrodynamic, light scattering, light transmittance, or other effect to continuously monitor relative particulate matter loadings.

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(A)	Visible PE from each stack serving these emissions units shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-07(B) (applicable only for emissions units located in an area identified in Appendix A of OAC rule 3745-17-08)	Visible PEof fugitive dust from these emissions units shall not exceed twenty percent opacity as a three-minute average.
c.	OAC rule 3745-17-08(B) (applicable only for emissions units located in an area identified in Appendix A of OAC rule 3745-17-08)	Each electric arc furnace shall be hooded and vented to a baghouse. Each furnace and emissions control system shall be operated and maintained in a manner which maximizes the capture and controloffurnaceemissions. A continuous draft shall be maintained through the hood system during charging and electrode removal that is sufficient to minimize or eliminate visible emissions of fugitive dust.
d.	OAC rule 3745-17-11(B)	Stack particulate emissions (PE) shall not exceed 9.5 pounds/hour from P904 & P905, combined (based upon Figure II, which is more stringent than Table I, and an uncontrolled mass rate of emission of 76.2 pounds/hour.)
e.	OAC rule 3745-31-05(D)	Carbon monoxide (CO) emissions from P904 & P905, combined, shall not exceed 36.75 tons/year based upon a rolling, 12-month summation of the monthly emissions. P904 & P905 have been in operation for more than 12 months and, as such, the permittee has existing

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		records to generate the rolling, 12-month summation of the monthly emissions, upon issuance of this permit.
f.	40 CFR Part 63, Subpart ZZZZZ	See numbers 3 through 5 of the "**B. Facility-Wide Terms and Conditions**" above for applicable requirements for this existing small foundry in Subpart ZZZZZ.
g.	40 CFR Part 63,Subpart A	The permittee shall comply with the General Provisions in §§63.1 through 63.16 thatare applicable to this existing small foundry in Subpart ZZZZZ. The complete 40 CFR Part 63 requirements, including the General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR)website: http://ecfr.gpoaccess.gov.

(2) Additional Terms and Conditions

a. Per Engineering Guide #31, P904 & P905 meet the criteria for similar emissions units and shall be grouped together to establish the hourly PE limitation. Therefore, a combined P904 & P905 maximum capacity of 6 tons/hour of gross melt production, multiplied by an uncontrolled emission factor of 12.7 pounds of PE/ton of gross melt production (AP-42, 5th edition 1/95, Table 12.10-3), yields an uncontrolled mass rate of emission (UMRE) of PE from P904 & P905, combined, of 76.2 pounds/hour, and from Curve P-1 of Figure II, a maximumallowableemissionrate of 9.5 pounds/hour of PE.

b. The permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final federally enforceable permit-to-install and operate (FEPTIO) prior to making any change to equipment, change in the method of operation, or any other change to either or both of these emissions units that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 of any type of air contaminant not previously emitted.

c. The emissions from this emissions unit shall be vented to abaghouse at all times the emissions unit is in operation.

d. Pursuant to CAFOItems40 through 43 ("Environmentally Beneficial Activities"), the permittee shall comply with the following federally enforceable requirements:

i. Install and operate a bag leak detection system on the new baghouse serving both emissions units P904 and P905, as specified in this administrative modification application #M0001902, tomonitor the

operation of the baghouse. The bag leak detection system shall provide information to help assure the baghouse, when operating, is operating in a manner consistent with good air pollution control practices to minimize emissions by maximizing the capture and control of furnace emissions.

ii. The bag leak detection system must provide a continuous record of select parameters which will demonstrate the proper operation of the new baghouse.

iii. Develop a site-specific monitoring plan that addresses:

(a) Initial and periodic adjustment of the bag leak detection system, including how the “leak” set-point will be established;

(b) Operation of the bag leak detection system, including quality assurance procedures; and

(c) How the bag leak detection system output shall be recorded, stored and used to determine compliance with applicable emission limits.

iv. Operate and maintain the bag leak detection system according to the site-specific monitoring plan and manufacturer’s recommendations, instructions and operating manuals.

v. Notify U.S. EPA and Akron Regional AQMD when the installation of the new baghouse and bag leak detection system is complete.

e. In addition to meeting CAFO requirements above in term b)(2)(d), the permittee shall comply with the following requirements for the bag leak detection system:

i. The system must be certified by the manufacturer to be capable of detecting emissions of particulate matter at concentrations of 10 milligrams per actual cubic meter (0.00044 grains per actual cubic foot) or less.

ii. The bag leak detection system sensor must provide output of relative particulate matter loadings and the owner or operator shall continuously record the output from the bag leak detection system using a strip chart recorder, data logger, or other means.

iii. The system must be equipped with an alarm that will sound when an increase in relative particulate loadings is detected over the alarm set point established in the operation and maintenance plan, and the alarm must be located such that it can be heard by the appropriate plant personnel.

iv. The initial adjustment of the system must, at minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points.

If the system is equipped with an alarm delay time feature, you also must adjust the alarm delay time.

v. Following the initial adjustment, do not adjust the sensitivity or range, averaging period, alarm set point, or alarm delay time. Except, once per quarter, you may adjust the sensitivity of the bag leak detection system to account for seasonable effects including temperature and humidity according to the procedures in the site-specific monitoring plan required by term d)(6).

vi. For negative pressure baghouses, induced air baghouses, and positive pressure baghouses that are discharged to the atmosphere through a stack, the bag leak detector sensor must be installed downstream of the baghouse and upstream of any wet scrubber.

vii. Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

c) Operational Restrictions

(1) The maximum annual production rate of P904 & P905, combined, shall not exceed 14,000 tons of gross melt production, based upon a rolling, 12-month summation of the monthly production rates. P904 & P905 have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the monthly production rates, upon issuance of this permit.

(2) The permittee shall employ the baghouse serving these emissions units at all times the emissions unit(s)is/are in operation.

(3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop, in inches of water, across the baghouse shall be based upon the manufacturer’s recommendations, with any modifications deemed necessary by the permittee, until such time as any required emission testing is conducted that establishes an appropriate range or limit for the pressure drop while the emissions unit demonstratescompliance with the applicable PE limitation(s).

(4) In addition to meeting CAFO requirements above in term b)(2)(d), the permitteemustemploy the bag leak detection system, as required by this permit, at all times the baghouse is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall document when thebaghouse serving these emissions units was not in service when the emissions unit(s) was/were in operation.

(2) The permittee shall properly install, operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouseon a weekly 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.

Whenever the monitored value for the pressure drop deviates from the limit or range 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:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

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

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

k. 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 or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. 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(s). 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 anadministrative modification.

(3) The permittee shall perform daily checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions of fugitive dust from non stack egress points (i.e., building windows, doors, roof monitors, etc.) serving these emissions units. The presence or absence of any visible particulate emissions of fugitive dust shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

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

d. the total duration of any visible particulate emissions of fugitive dust 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.

(4) The permittee shall maintain the following monthly records for P904 & P905, combined, for each month of operations:

a. the gross melt production, in tons/month;

b. the calculated monthly CO emissions, in tons/month;

c. the rolling, 12-month summation of the monthly gross melt productionrates, in tons; and

d. the rolling, 12-month summation of the calculated monthly CO emissions rates, in tons.

(5) In addition to meeting CAFO requirements above in term b)(2)(d), the permitteemustdocument all periods of time when the bag leak detection system was not in service when the baghouse was in operation.

(6) In addition to meeting CAFO requirements above in term b)(2)(d), the permitteemust prepare a site-specific monitoring plan for each bag leak detection system. You must operate and maintain each bag leak detection system according to the plan at all times. Each plan must address all of the following items:

a. Installation of the bag leak detection system.

b. Initial and periodic adjustment of the bag leak detection system including how the alarm set-point will be established.

c. Operation of the bag leak detection system including quality assurance procedures.

d. Maintenance of the bag leak detection system including a routine maintenance schedule and spare parts inventory list.

e. How the bag leak detection system output will be recorded and stored.

f. Procedures for determining what corrective actions are necessary in the event of a bag leak detection alarm as required in term d)(7).

(7) In addition to meeting CAFO requirements above in term b)(2)(d), in the event that a bag leak detection system alarm is triggered, you must initiate corrective action to determine the cause of the alarm within 1 hour of the alarm, initiate corrective action to correct the cause of the problem within 24 hours of the alarm, and complete corrective action as soon as practicable, but no later than 10 calendar days from the date of the alarm. You must record the date and time of each valid alarm, the time you initiated corrective action, the correction action taken, and the date on which corrective action was completed. Corrective actions may include, but are not limited to:

a. Inspecting the bag house for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in emissions.

b. Sealing off defective bags or filter media.

c. Replacing defective bags or filter media or otherwise repairing the control device.

d. Sealing off a defective baghouse department.

e. Cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system.

f. Shutting down the process producing the particulate emissions.

(8) In addition to meeting CAFO requirements above in term b)(2)(d), the permitteemust keep records for bag leak detection systems as follows:

a. Records of the bag leak detection system output;

b. Records of bag leak detection system adjustments, including the date and time of the adjustment, the initial bag leak detection system settings, and the final bag leak detection system settings; and

c. The date and time of all bag leak detection system alarms, and for each valid alarm, the time you initiated corrective action, the corrective action taken, and the date on which corrective action was completed.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. CO emissions from P904 & P905, combined, shall not exceed 36.75 tons/year based upon a rolling, 12-month summation of the monthly emissions.

ii. The maximum annual production rate of P904 & P905, combined, shall not exceed 14,000 tons of gross melt production, based upon a rolling, 12-month summation of the monthly production rates.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the baghouse serving this emissions unit was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(3) above:

a. all days during which any visible particulate emissions of fugitive dust were observed from non stack egress points (i.e., building windows, doors, roof monitors, etc.) serving these emissions units; and

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

(5) The permittee shall identify in the annual PER the following information concerning the operations of the baghouse during the 12-month reporting period for this emissions unit, in accordance with the requirements in term number d)(2) above:

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

b. an identification of each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;

d. an identification of each incident of deviation described in “a” 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; and

e. anidentificationof each incident when the baghouse was not in service while the emissions unit was in operation

(6) In addition to meeting CAFO requirements above in term b)(2)(d), the permitteemustidentify the following information in the annual PER in accordance with the monitoring requirements for the bag leak detection system in terms d)(5) and d)(8) above:

a. all periods of time when the bag leak detection system was not in service when the baghouse was in operation; and

b. the date and time of all bag leak detection system alarms, and for each valid alarm, the time you initiated corrective action, the corrective action taken, and the date on which corrective action was completed.

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 PE from each stack serving these emissions units shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

<u>Applicable Compliance Method</u>:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

c. Emission Limitation:

Stack particulate emissions (PE) shall not exceed 9.5 pounds/hour from P904 & P905, combined.

Applicable Compliance Method:

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

d. Emission Limitation: 36.75 tons/year of CO from P904 & P905, combined, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method: Compliance shall be demonstrated by thefollowing equation:

Y=REW

Where,

Y = the rolling, 12-month summation of the CO emissions, in tons;

R = the rolling, 12-month summation of the monthly production rates for P904 & P905, combined;

E = 5.25 pounds of CO/ton of gross melt production (AP-42, 5th edition 1/95, Table 12.10-5);and

W = 1 ton/2000 pounds.

g) Miscellaneous Requirements

(1) Pursuant to OAC rule 3745-31-05(D), all the terms and conditions of this permit are federally enforceable requirements.