



Environmental Protection Agency

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

10/29/2012

PHILLIP HENZER  
BUNTING BEARINGS LLC  
1001 HOLLAND PARK BLVD  
HOLLAND, OH 43628

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0326000015  
Permit Number: P0108083  
Permit Type: Initial Installation  
County: Fulton

Certified Mail

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

Dear Permit Holder:

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

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-NWDO





Response to Comments

Table with 2 columns: Field Name and Value. Fields include Facility ID, Facility Name, Facility Description, Facility Address, Permit, and public notice details.

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

Topic: Bunting Bearings was the only commenter on the proposed permit. The company had comments on several specific permit terms with the OEPAs responses below.

- Comment: Incorrect Facility Description.....
Response: OEPA agrees that this was cited in error on the public notice.
Comment: Request to change time period to 24hours.....
Response: The permit reads.....the permittee shall initiate investigation of the baghouse and/or emissions unit(s) within one (1) hour of the first discovery of the alarming incident for possible corrective action.



- Comment: Visible stack PE shall not exceed 0% opacity as a 6 minute average.....

Response: This type of limitation is consistent with other OEPA permits and is established in conjunction with most stack particulate emission limitations. There is no requirement that the company hire a certified visible emissions evaluator to read visible emissions.

- Comment: Testing requirements.....

Response: The permit is consistent with the current OEPA permitting language in that requires testing be done under the “worst case” scenario. This requirement is in place in order to ensure that the emission units are capable of being in compliance at all times. This requirement is not intended to make the company operate equipment in a manner that is impossible/impractical from an operations standpoint. For example, the OEPA is aware that, for all practical purposes, the 7 Casting Machine Tundishs cannot be operated simultaneously. The OEPA has observed and approved previous performance tests at the facility on the tundishs and has not required that they all be operating during the test. As part of any stack test notification, it would be necessary for the company to indicate why the proposed operating scenario meets the definition of worst case. This proposal should address particulate emissions as well as lead emissions.

- Comment: Request to raise the emission limits on baghouse C.....

Response: The emission units that are associated with baghouse C do not place the same demands on the control device as the other emission units at the facility place on their respective control devices, hence the lower limit. In addition, historical stack test data would indicate that this limit is very conservative as compared to the actual emissions measured.

- Comment: Testing schedule.....

Response: This is a ten year permit, and the requirement that the initial test be completed within 3 years was based on when the last performance tests were done at the facility (approximately 3 yrs .ago).



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
BUNTING BEARINGS LLC**

Facility ID:	0326000015
Permit Number:	P0108083
Permit Type:	Initial Installation
Issued:	10/29/2012
Effective:	11/1/2012
Expiration:	11/1/2022





Division of Air Pollution Control
Permit-to-Install and Operate
for
BUNTING BEARINGS LLC

Table of Contents

Authorization ..... 1
A. Standard Terms and Conditions ..... 4
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 5
2. Who is responsible for complying with this permit? ..... 5
3. What records must I keep under this permit? ..... 5
4. What are my permit fees and when do I pay them?..... 5
5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 5
6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 6
7. What reports must I submit under this permit? ..... 6
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? ..... 6
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 6
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 7
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 7
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 7
13. Can I transfer this permit to a new owner or operator?..... 8
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 8
15. What happens if a portion of this permit is determined to be invalid? ..... 8
B. Facility-Wide Terms and Conditions..... 9
C. Emissions Unit Terms and Conditions ..... 11
1. Emissions Unit Group -BGHSA: P020,P021,P022,P023,P024,P025,P029, ..... 12
2. Emissions Unit Group -BGHSB: P014,P015,P016,P017,P018,P019,P028, ..... 19
3. Emissions Unit Group -BGHSC: P005,P006,P007,P008,P009,P010,P011,P013, ..... 26



## Authorization

Facility ID: 0326000015  
Application Number(s): A0041850  
Permit Number: P0108083  
Permit Description: Permits for all furnaces, tundishes, centrifugal machines and other miscellaneous equipment at the facility. Places Federably Enforceable restrictions in accordance with OEPA SIP proposal to achieve compliance with the lead NAAQS. This is a new installation for P028 and P029 only  
Permit Type: Initial Installation  
Permit Fee: \$400.00  
Issue Date: 10/29/2012  
Effective Date: 11/1/2012  
Expiration Date: 11/1/2022  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

BUNTING BEARINGS LLC  
200-208 VAN BUREN  
Delta, OH 43515

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

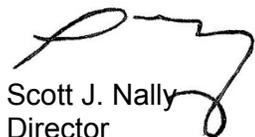
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

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: P0108083  
 Permit Description: Permits for all furnaces, tundishes, centrifugal machines and other miscellaneous equipment at the facility. Places Federably Enforceable restrictions in accordance with OEPA SIP proposal to achieve compliance with the lead NAAQS. This is a new installation for P028 and P029 only

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

**Group Name: BGHSA**

<b>Emissions Unit ID:</b>	<b>P020</b>
Company Equipment ID:	#1 Casting Machine Tundish
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P021</b>
Company Equipment ID:	#3 Casting Machine Tundish
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P022</b>
Company Equipment ID:	#4 Casting Machine Tundish
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P023</b>
Company Equipment ID:	#5 Casting Machine Tundish
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P024</b>
Company Equipment ID:	#6 Casting Machine Tundish
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P025</b>
Company Equipment ID:	#7 Casting Machine Tundish
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P029</b>
Company Equipment ID:	#2 Casting Machine Tundish
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: BGHSB**

<b>Emissions Unit ID:</b>	<b>P014</b>
Company Equipment ID:	#1 Induction Melting Furnace - Continuous Cast
Superseded Permit Number:	03-5823
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P015</b>
Company Equipment ID:	#3 Induction Melting Furnace - Continuous Cast
Superseded Permit Number:	03-5823
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P016</b>
Company Equipment ID:	INDUCTION MELT FURNACE #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

<b>Emissions Unit ID:</b>	<b>P017</b>
Company Equipment ID:	INDUCTION MELT FURNACE #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P018</b>
Company Equipment ID:	INDUCTION MELT FURNACE #6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P019</b>
Company Equipment ID:	#7 Induction Melting Furnace - Continuous Cast
Superseded Permit Number:	03-5823
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P028</b>
Company Equipment ID:	#2 Induction Melting Furnace - Continuous Cast
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: BGHSC**

<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	METAL RECLAIM; 1200 LB/HR
Superseded Permit Number:	03-5079
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	#1 3000 Centrifugal Melt Furnace
Superseded Permit Number:	03-5080
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P007</b>
Company Equipment ID:	#2 3000 Centrifugal Melt Furnace
Superseded Permit Number:	03-5080
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P008</b>
Company Equipment ID:	#1 CENTRIFUGAL CAST MACHINE,HORIZONTAL
Superseded Permit Number:	P0024831
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P009</b>
Company Equipment ID:	#2 CENTRIFUGAL CAST MACHINE, HORIZONTAL
Superseded Permit Number:	P0024832
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P010</b>
Company Equipment ID:	#3 CENTRIFUGAL CAST MACHINE; VERTICAL
Superseded Permit Number:	P0024833
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P011</b>
Company Equipment ID:	#4 CENTRIFUGAL CAST MACHINE; VERTICAL
Superseded Permit Number:	P0024834
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P013</b>
Company Equipment ID:	TRANSPORT LADEL
Superseded Permit Number:	P0024836
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 Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**1. Emissions Unit Group -BGHSA: P020,P021,P022,P023,P024,P025,P029,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P020	#1 Casting Machine Tundish
P021	#3 Casting Machine Tundish
P022	#4 Casting Machine Tundish
P023	#5 Casting Machine Tundish
P024	#6 Casting Machine Tundish
P025	#7 Casting Machine Tundish
P029	#2 Casting Machine Tundish

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p><u>For emissions units P020, P021, P022, P023, P024, P025, and P029, combined:</u></p> <p>Particulate emissions (PE) shall not exceed 1.50 lbs PE/hr and 6.57 tons PE/yr</p> <p>Lead (Pb) emissions shall not exceed 0.150 lb Pb/hr and 0.66 ton Pb/yr.</p> <p>Visible stack PE shall not exceed 0% opacity, as a 6-minute average.</p> <p>See b)(2)a.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)	See b)(2)b.
d.	OAC rule 3745-17-11(B)	See b)(2)c.
e.	OAC rule 3745-17-07(A)	See b)(2)c.

(2) Additional Terms and Conditions

- a. The following federally enforceable emission limitations have been established for the purpose of limiting potential to emit (PTE) of the particulates and lead emissions from the Bunting Bearing's facility, located in Delta Ohio. These emission limitations and control requirements, in conjunction with the Preventative Maintenance Plan specified in condition g)(1), constitute Reasonably Available Control Measures (RACM)\* for this facility:
- i. use of a fabric filtration control system that can achieve a maximum allowable mass emission rates of 1.50 lbs PE/hr\*\* and 0.150 lb Pb/hr. The fabric filtration control system shall consist of a baghouse to control PE and proper hoods/enclosures for the control of fugitive emissions to the fullest extent practical;
  - ii. visible stack PE shall not exceed 0% opacity, as a 6-minute average; and,
  - iii. mass emission rate limitations 6.57 tons PE/yr\*\* and 0.66 ton Pb/yr.
- b. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A).
- c. The emission limitation specified by this rule is less stringent than the established requirements established pursuant to OAC rule 3745-31-05(D).

\*This RACM determination is in accordance with Ohio's 2008 Revised Lead Standard State Implementation Plan (SIP) for the Fulton County PartialNonattainment Area.

\*\* Particulate matter emissions include Pb.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly production records for all lead-containing products, including the production rate of each type of product produced, in tons, and the corresponding lead content, in percent by weight.
- (2) The permittee shall calibrate, maintain, and continuously operate a fabric filter bag leak detection system, in accordance with the system manufacturer's instructions, to monitor

the baghouse performance. For this purpose, the term "fabric filter bag leak detection system" means a system that is capable of continuously monitoring relative particulate emissions (dust) loadings in the exhaust of a baghouse in order 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, light scattering, light transmittance, or other effect to continuously monitor relative particulate emissions loadings. The fabric filter bag leak detection system shall meet the following:

- a. The fabric filter bag leak detection system must be certified by the manufacturer to be capable of detecting particulate emissions.
  - b. The fabric filter bag leak detection system sensor must provide output of relative particulate emissions loading, and the permittee shall continuously monitor and record the output signal from the sensor.
  - c. The fabric filter bag leak detection system must be equipped with an alarm system that will sound when an increase in relative particulate emissions loading is detected over a preset level, and the alarm must be located such that it can be heard by the appropriate plant personnel.
  - d. The initial adjustment of the fabric filter bag leak detection system shall, at a 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 and the alarm delay time. Following the initial adjustment, the permittee shall not adjust the range, averaging period, alarm setpoints, or alarm delay time except as detailed in the operations, maintenance, and monitoring plan. In no event shall the range be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless a responsible official certifies, by a written report, that the baghouse has been inspected and found to be in good operating condition.
- (3) At a minimum, the permittee shall maintain the bag leak detection system in accordance with the following requirements:
- a. keep onsite the necessary parts for routine repairs of the monitoring equipment;
  - b. keep records of all inspections and maintenance performed on the fabric filter bag leak detection system. Records shall include the date and time of each inspection or maintenance activity; the activities performed; and the results of any drift checks and response tests; and
  - c. conduct monthly QA checks and annual instrument set ups of the fabric filter bag leak detection system consistent with the guidance provided in EPA-454/R-98-015: U.S. EPA Fabric Filter Bag Leak Detection Guidance.
- (4) If the fabricfilterbag leak detection system alarms, the permittee shall initiate investigation of the baghouse and/or emissions unit(s) within one (1) hour of the first discovery of the alarming incident for possible corrective action. If corrective action is required, the permittee shall proceed to implement such corrective action, in accordance with the written preventative maintenance plan (PMP) established in g)(1), as soon as

practicable in order to minimize possible exceedances of the emission limitations established in b)(1).

The permittee shall maintain records of each bag leak detection system alarm, including the date and time of the alarm, the amount of time taken for corrective action to be initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. all periods of time in which the bag leak detection alarm system was triggered; and
  - b. all periods of time (including the date) in which the permittee did not initiate corrective actions, within 1 hour of an alarm from the bag leak detection system.
- (2) 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.

These quarterly 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, unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 years after permit issuance and within 6 months of permit expiration. The testing time frames specified are based on current production rates of lead-containing products at the facility, and these time frames may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
  - b. The emission testing shall be conducted to demonstrate compliance with the mass emission limitations for PE and for Pb.
  - c. The following test methods shall be employed to demonstrate compliance with the above emission limitations:

- i. Methods 1 - 4 of 40 CFR Part 60, Appendix A;
- ii. for Pb - Method 29 of 40 CFR Part 60, Appendix A;
- iii. for PE - Method 5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

- d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office). MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.
  - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).
  - f. Personnel from the Director (the Ohio EPA, Northwest District Office) shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - 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 Director (the Ohio EPA, Northwest District Office) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Director (the Ohio EPA, Northwest District Office).
- (2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitations:  
1.50 lbs PE/hr and 6.57 tons PE/yr

Applicable Compliance Method:

Compliance with the hourly mass emission limitation shall be demonstrated based on the results of emission testing specified in condition f)(1).

The annual limitation was established by multiplying the hourly limitation by the maximum operating schedule of 8,760 hours/year, and then dividing by 2,000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

b. Emission Limitations:

0.150 lb Pb/hr and 0.66 tons Pb/yr

Applicable Compliance Method:

Compliance with the hourly mass emission limitation shall be demonstrated based on the results of emission testing specified in condition f)(1).

The annual limitation was established by multiplying the hourly limitation by the maximum operating schedule of 8,760 hours/year, and then dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the pound per hour limitation, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitation:

Visible stack PE shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be demonstrated according to Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) The permittee shall maintain the existing preventative maintenance plan (PMP) for all the control equipment and operational practices associated with these emissions units. The purpose of the PMP is to reduce the stack and fugitive particulate emissions to the fullest extent practical and PMP shall have a detailed breakdown of any steps taken to achieve this purpose. At a minimum, the PMP shall identify the responsible parties associated with each action, and include (but is not limited to) the following:
  - a. a preventative maintenance schedule for the baghouse and the associated equipment, including maintaining a supply of bags, or any other parts necessary to ensure that the collection/control system will operate properly;
  - b. establish a procedure for the proper handling and storage of the collected baghouse dust;

- c. an inspection schedule and visible emissions checks (where appropriate) for any location that fugitive dust may collect/occur such as roadways, rooftops, building egress points etc.;
- d. procedure(s) for controlling accidental releases; and
- e. establish procedures for addressing a fabric filter bag leak detection system alarm, including shutdown procedures and bag inspection/replacement.

This plan shall be reviewed and updated as necessary and any changes shall be made available for review and approval of the Ohio EPA, Northwest District Office.

- (2) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the fabric filter bag leak detection system monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator range or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

**2. Emissions Unit Group -BGHSB: P014,P015,P016,P017,P018,P019,P028,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P014	#1 Induction Melting Furnace - Continuous Cast
P015	#3 Induction Melting Furnace - Continuous Cast
P016	#4 Induction Melting Furnace - Continuous Cast
P017	#5 Induction Melting Furnace - Continuous Cast
P018	#6 Induction Melting Furnace - Continuous Cast
P019	#7 Induction Melting Furnace - Continuous Cast
P028	#2 Induction Melting Furnace - Continuous Cast

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p><u>For emissions units P014, P015, P016, P017, P018, P019, and P028 combined:</u></p> <p>Particulate Emissions (PE) shall not exceed 1.50 lbs PE/hr and 6.57 tons PE/yr</p> <p>Lead (Pb) emissions shall not exceed 0.150 lb Pb/hr and 0.66 ton Pb/yr.</p> <p>Visible stack PE shall not exceed 0% opacity, as a 6-minute average.</p> <p>See b)(2)a.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)	See b)(2)b.
d.	OAC rule 3745-17-11(B)	See b)(2)c.
e.	OAC rule 3745-17-07(A)	See b)(2)c.

(2) Additional Terms and Conditions

- a. The following federally enforceable emission limitations have been established for the purpose of limiting potential to emit (PTE) of the particulate and Lead emissions from the Bunting Bearing's facility, located in Delta Ohio. These emission limitations and control requirements, in conjunction with the Preventative Maintenance Plan specified in condition g)(1), constitute Reasonably Available Control Measures (RACM)\* for this facility:
  - i. use of a fabric filtration control system that can achieve a maximum allowable mass emission rates of 1.50 lbs PE/hr\*\* and 0.150 lb Pb/hr. The fabric filtration control system shall consist of a baghouse to control PE and proper hoods/enclosures for the control of fugitive emissions to the fullest extent practical;
  - ii. visible stack PE shall not exceed 0% opacity, as a 6-minute average; and,
  - iii. mass emission rate limitations 6.57 tons PE/yr\*\* and 0.66 ton Pb/yr.
- b. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A). For this emissions group, OAC rule 3745-31-05(A) is only applicable to emissions unit P028.
- c. The emission limitation specified by this rule is less stringent than the established requirements established pursuant to OAC rule 3745-31-05(D).

\*This RACM determination is in accordance with Ohio's 2008 Revised Lead Standard State Implementation Plan (SIP) for the Fulton County Partial Nonattainment Area.

\*\* Particulate matter emissions include Pb.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly production records for all lead-containing products, including the production rate of each type of product produced, in tons, and the corresponding lead content, in percent by weight.

- (2) The permittee shall calibrate, maintain, and continuously operate a fabric filter bag leak detection system, in accordance with the system manufacturer's instructions, to monitor the baghouse performance. For this purpose, the term "fabric filter bag leak detection system" means a system that is capable of continuously monitoring relative particulate emissions (dust) loadings in the exhaust of a baghouse in order 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, light scattering, light transmittance, or other effect to continuously monitor relative particulate emissions loadings. The fabric filter bag leak detection system shall meet the following:
- a. The fabric filter bag leak detection system must be certified by the manufacturer to be capable of detecting particulate emissions.
  - b. The fabric filter bag leak detection system sensor must provide output of relative particulate emissions loading, and the permittee shall continuously monitor and record the output signal from the sensor.
  - c. The fabric filter bag leak detection system must be equipped with an alarm system that will sound when an increase in relative particulate emissions loading is detected over a preset level, and the alarm must be located such that it can be heard by the appropriate plant personnel.
  - d. The initial adjustment of the fabric filter bag leak detection system shall, at a 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 and the alarm delay time. Following the initial adjustment, the permittee shall not adjust the range, averaging period, alarm setpoints, or alarm delay time except as detailed in the operations, maintenance, and monitoring plan. In no event shall the range be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless a responsible official certifies, by a written report, that the baghouse has been inspected and found to be in good operating condition.
- (3) At a minimum, the permittee shall maintain the bag leak detection system in accordance with the following requirements:
- a. keep onsite the necessary parts for routine repairs of the monitoring equipment;
  - b. keep records of all inspections and maintenance performed on the fabric filter bag leak detection system. Records shall include the date and time of each inspection or maintenance activity; the activities performed; and the results of any drift checks and response tests; and
  - c. conduct monthly QA checks and annual instrument set ups of the fabric filter bag leak detection system consistent with the guidance provided in EPA-454/R-98-015: U.S. EPA Fabric Filter Bag Leak Detection Guidance.
- (4) If the fabric filter bag leak detection system alarms, the permittee shall initiate investigation of the baghouse and/or emissions unit(s) within one (1) hour of the first discovery of the alarming incident for possible corrective action. If corrective action is required, the permittee shall proceed to implement such corrective action, in accordance

with the written preventative maintenance plan (PMP) established in g)(1), as soon as practicable in order to minimize possible exceedances of the emission limitations established in b)(1).

The permittee shall maintain records of each bag leak detection system alarm, including the date and time of the alarm, the amount of time taken for corrective action to be initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.

e) Reporting Requirements

(1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

- a. all periods of time in which the bag leak detection alarm system was triggered; and
- b. all periods of time (including the date) in which the permittee did not initiate corrective actions, within 1 hour of an alarm from the bag leak detection system.

(2) 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.

These quarterly 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, unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

f) Testing Requirements

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

- a. The emission testing shall be conducted within 3 years after permit issuance and within 6 months of permit expiration. The testing time frames specified are based on current production rates of lead containing products at the facility, and these time frames may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
- b. The emission testing shall be conducted to demonstrate compliance with the mass emission limitations for PE and for Pb.

- c. The following test methods shall be employed to demonstrate compliance with the above emission limitations:
  - i. Methods 1 - 4 of 40 CFR Part 60, Appendix A;
  - ii. for Pb - Method 29 of 40 CFR Part 60, Appendix A;
  - iii. for PE - Method 5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

- d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office). MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.
  - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).
  - f. Personnel from the Director (the Ohio EPA, Northwest District Office) shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - 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 Director (the Ohio EPA, Northwest District Office) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Director (the Ohio EPA, Northwest District Office).
- (2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

1.50 lbs PE/hr and 6.57 tons PE/yr

Applicable Compliance Method:

Compliance with the hourly mass emission limitation shall be demonstrated based on the results of the emission testing specified in condition f)(1).

The annual limitation was established by multiplying the hourly limitation by the maximum operating schedule of 8,760 hours/year, and then dividing by 2,000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

b. Emission Limitations:

0.150 lb Pb/hr and 0.66 tons Pb/yr

Applicable Compliance Method:

Compliance with the hourly mass emission limitation shall be demonstrated based on the results of the emission testing specified in condition f)(1).

The annual limitation was established by multiplying the hourly limitation by the maximum operating schedule of 8,760 hours/year and then dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the pound per hour limitation, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitation:

Visible stack PE shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be demonstrated according to Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) The permittee shall maintain the existing preventative maintenance plan (PMP) for all the control equipment/operational practices associated with these emissions units. The purpose of the PMP is to reduce the stack and fugitive particulate emissions to the fullest extent practical. The PMP shall have a detailed breakdown of any steps taken for maintaining the equipment as well as the schedule for doing so. At a minimum, the PMP shall the plan shall identify the responsible parties associated with each action, and include (but is not limited to) the following:

a. a preventative maintenance schedule for the baghouse and the associated equipment;

- b. establish a procedure for the proper handling and storage of the collected baghouse dust;
- c. an inspection schedule and visible emissions checks (where appropriate) for any location that fugitive dust may collect/occur such as roadways, rooftops, building egress points etc.;
- d. procedure(s) for controlling accidental releases; and
- e. establish procedures for addressing a fabric filter bag leak detection system alarm, including shutdown procedures and bag inspection/replacement.

This plan shall be reviewed and updated as necessary and any changes shall be made available for review and approval of the Ohio EPA, Northwest District Office.

- (2) The permittee shall maintain the existing written quality assurance procedures to assess and document the continuing functioning and accuracy of the particulate emissions monitor and any alarm transmission units. The permittee shall follow the recommendations in the U.S. EPA's document number EPA-454/R-98-015 (Fabric Filter Bag Leak Detection Guidance) in developing and maintaining the quality assurance procedures for the monitor. These procedures shall be reviewed and updated as necessary and any changes shall be made available for review and approval of the Ohio EPA, Northwest District Office.

**3. Emissions Unit Group -BGHSC: P005,P006,P007,P008,P009,P010,P011,P013,**

EU ID	Operations, Property and/or Equipment Description
P005	Crusher - Ball Mill for Metal Reclamation
P006	#1 3000 Centrifugal Melt Furnace
P007	#2 3000 Centrifugal Melt Furnace
P008	#1 Horizontal Centrifugal Casting Machine
P009	#2 Horizontal Centrifugal Casting Machine
P010	#3 Vertical Centrifugal Casting Machine
P011	#4 Vertical Centrifugal Casting Machine
P013	Centrifugal Transport Ladle

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. None.
- (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<p><u>For emissions units P005, P006, P007, P008, P009, P010, P011, and P013 combined:</u></p> <p>Particulate Emissions (PE) shall not exceed 0.75 lb PE/hr and 3.29 tons PE/yr</p> <p>Lead (Pb) emissions shall not exceed 0.075 lb Pb/hr and 0.33 ton Pb/yr.</p> <p>Visible stack PE shall not exceed 0% opacity, as a 6-minute average.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)	See b)(2)b.
d.	OAC rule 3745-17-11(B)	See b)(2)c.
e.	OAC rule 3745-17-07(A)	See b)(2)c.

(2) Additional Terms and Conditions

- a. The following federally enforceable emission limitations have been established for the purpose of limiting potential to emit (PTE) of the particulate and Lead emissions from the Bunting Bearing’s facility, located in Delta Ohio. These emission limitations and control requirements, in conjunction with the Preventative Maintenance Plan specified in condition g)(1), constitute Reasonably Available Control Measures (RACM)\* for this facility:
  - i. use of a fabric filtration control system that can achieve a maximum allowable mass emission rates of 0.75 lb PE/hr\*\* and 0.075 lb Pb/hr. The fabric filtration control system shall consist of a baghouse to control PE and proper hoods/enclosures for the control of fugitive emissions to the fullest extent practical;
  - ii. visible stack PE shall not exceed 0% opacity, as a 6-minute average; and,
  - iii. mass emission rate limitations 3.29 tons PE/yr\*\* and 0.33 ton Pb/yr.
- b. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A).
- c. The emission limitation specified by this rule is less stringent than the established requirements established pursuant to OAC rule 3745-31-05(D).

\*This RACM determination is in accordance with Ohio’s 2008 Revised Lead Standard State Implementation Plan (SIP) for the Fulton County PartialNonattainment Area.

\*\* Particulate matter emissions include Pb.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly production records for all lead-containing products, including the production rate of each type of product produced, in tons, and the corresponding lead content, in percent by weight.

- (2) The permittee shall calibrate, maintain, and continuously operate a fabric filter bag leak detection system, in accordance with the system manufacturer's instructions, to monitor the baghouse performance. For this purpose, the term "fabric filter bag leak detection system" means a system that is capable of continuously monitoring relative particulate emissions (dust) loadings in the exhaust of a baghouse in order 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, light scattering, light transmittance, or other effect to continuously monitor relative particulate emissions loadings. The fabric filter bag leak detection system shall meet the following:
- a. The fabric filter bag leak detection system must be certified by the manufacturer to be capable of detecting particulate emissions.
  - b. The fabric filter bag leak detection system sensor must provide output of relative particulate emissions loading, and the permittee shall continuously monitor and record the output signal from the sensor.
  - c. The fabric filter bag leak detection system must be equipped with an alarm system that will sound when an increase in relative particulate emissions loading is detected over a preset level, and the alarm must be located such that it can be heard by the appropriate plant personnel.
  - d. The initial adjustment of the fabric filter bag leak detection system shall, at a 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 and the alarm delay time. Following the initial adjustment, the permittee shall not adjust the range, averaging period, alarm setpoints, or alarm delay time except as detailed in the operations, maintenance, and monitoring plan. In no event shall the range be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless a responsible official certifies, by a written report, that the baghouse has been inspected and found to be in good operating condition.
- (3) At a minimum, the permittee shall maintain the bag leak detection system in accordance with the following requirements:
- a. keep onsite the necessary parts for routine repairs of the monitoring equipment;
  - b. keep records of all inspections and maintenance performed on the fabric filter bag leak detection system. Records shall include the date and time of each inspection or maintenance activity; the activities performed; and the results of any drift checks and response tests; and
  - c. conduct monthly QA checks and annual instrument set ups of the fabric filter bag leak detection system consistent with the guidance provided in EPA-454/R-98-015: U.S. EPA Fabric Filter Bag Leak Detection Guidance.
- (4) If the fabric filter bag leak detection system alarms, the permittee shall initiate investigation of the baghouse and/or emissions unit(s) within one (1) hour of the first discovery of the alarming incident for possible corrective action. If corrective action is required, the permittee shall proceed to implement such corrective action, in accordance

with the written preventative maintenance plan (PMP) established in g)(1), as soon as practicable in order to minimize possible exceedances of the emission limitations established in b)(1).

The permittee shall maintain records of each bag leak detection system alarm, including the date and time of the alarm, the amount of time taken for corrective action to be initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. all periods of time in which the bag leak detection alarm system was triggered; and
  - b. all periods of time (including the date) in which the permittee did not initiate corrective actions, within 1 hour of an alarm from the bag leak detection system.
- (2) 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.

These quarterly 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, unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 years after permit issuance and within 6 months of permit expiration. The testing time frames specified are based on current production rates of lead containing products at the facility, and these time frames may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
  - b. The emission testing shall be conducted to demonstrate compliance with the mass emission limitations for PE and for Pb.

- c. The following test methods shall be employed to demonstrate compliance with the above emission limitations:
  - i. Methods 1 - 4 of 40 CFR Part 60, Appendix A;
  - ii. for Pb - Method 29 of 40 CFR Part 60, Appendix A;
  - iii. for PE - Method 5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

- d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office). MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.
  - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).
  - f. Personnel from the Director (the Ohio EPA, Northwest District Office) shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - 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 Director (the Ohio EPA, Northwest District Office) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Director (the Ohio EPA, Northwest District Office).
- (2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

0.75 lb PE/hr and 3.29 tons PE/yr

Applicable Compliance Method:

Compliance with the hourly mass emission limitation shall be demonstrated based on the results of the emission testing specified in condition f)(1).

The annual limitation was established by multiplying the hourly limitation by the maximum operating schedule of 8,760 hours/year, and then dividing by 2,000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

b. Emission Limitations:

0.075 lb Pb/hr and 0.33 tons Pb/yr

Applicable Compliance Method:

Compliance with the hourly mass emission limitation shall be demonstrated based on the results of the emission testing specified in condition f)(1).

The annual limitation was established by multiplying the hourly limitation by the maximum operating schedule of 8,760 hours/year and then dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the pound per hour limitation, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitation:

Visible stack PE shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be demonstrated according to Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) The permittee shall maintain the existing preventative maintenance plan (PMP) for all the control equipment/operational practices associated with these emissions units. The purpose of the PMP is to reduce the stack and fugitive particulate emissions to the fullest extent practical. The PMP shall have a detailed breakdown of any steps taken for maintaining the equipment as well as the schedule for doing so. At a minimum, the PMP shall the plan shall identify the responsible parties associated with each action, and include (but is not limited to) the following:

a. a preventative maintenance schedule for the baghouse and the associated equipment;

- b. establish a procedure for the proper handling and storage of the collected baghouse dust;
- c. an inspection schedule and visible emissions checks (where appropriate) for any location that fugitive dust may collect/occur such as roadways, rooftops, building egress points etc.;
- d. procedure(s) for controlling accidental releases; and
- e. establish procedures for addressing a fabric filter bag leak detection system alarm, including shutdown procedures and bag inspection/replacement.

This plan shall be reviewed and updated as necessary and any changes shall be made available for review and approval of the Ohio EPA, Northwest District Office.

- (2) The permittee shall maintain the existing written quality assurance procedures to assess and document the continuing functioning and accuracy of the particulate emissions monitor and any alarm transmission units. The permittee shall follow the recommendations in the U.S. EPA's document number EPA-454/R-98-015 (Fabric Filter Bag Leak Detection Guidance) in developing and maintaining the quality assurance procedures for the monitor. These procedures shall be reviewed and updated as necessary and any changes shall be made available for review and approval of the Ohio EPA, Northwest District Office.