



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 03-13728

DATE: 5/14/2002

Semco Inc
Brett Tennar
1025 Pole Lane Rd
Marion, OH 43301-0561

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 5/14/2002
Effective Date: 5/14/2002**

FINAL PERMIT TO INSTALL 03-13728

Application Number: 03-13728
APS Premise Number: 0351010070
Permit Fee: **\$3200**
Name of Facility: Semco Inc
Person to Contact: Brett Tennar
Address: 1025 Pole Lane Rd
Marion, OH 43301-0561

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1025 Pole Lane Rd
Marion, Ohio**

Description of proposed emissions unit(s):

(2) electric induction furnaces, dross removal station, pouring station and cutting/grinding station.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Semco Inc

PTI Application: 03-13728

Issued: 5/14/2002

Facility ID: 0351010070

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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

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Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	0.12
Be	0.004*

*This is a facility wide limit.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P011 - Electric induction furnace with baghouse	OAC rule 3745-31-05(A)(3)	0.0002 gr PE/dscf, 0.0072 lb PE/hr, 0.032 TPY PE
		0.004 TPY Be from the entire facility
		Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average from the baghouse exhaust stack.
		Control requirements (See A.2.a)
		See A.2.b
	OAC rule 3745-17-07(A)	See A.2.c
	OAC rule 3745-17-11(B)	See A.2.d
	40 CFR Part 61, Subpart C	Emissions shall not exceed 10 grams of beryllium over a 24 hour period for the entire facility

2. Additional Terms and Conditions

- 2.a The "Best Available Technology" (BAT) requirement for this emissions unit has been determined to be the use of a baghouse.

- 2.b** The requirements of this rule also include compliance with the requirements of 40 CFR, Part 61, Subpart C.

- 2.c This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.d The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Marion County.

B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on weekly basis.

D. Reporting Requirements

- 1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. Pursuant to the General Provisions of 40 CFR, Part 61, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times for emissions unit P011:
 - a. a notification of the anticipated date of initial startup of the source not more than 60 days nor less than 30 days before that date; and
 - b. a notification of the actual date of initial startup of the source within 15 days after that date.

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Semco

PTI A

Issued: 5/14/2002

Emissions Unit ID: **P011**

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA, Northwest District Office
347 North Dunbridge Road
Bowling Green, Ohio 43302

E. 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 90 days of startup.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for beryllium.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for beryllium, Method 104 of 40 CFR Part 61, Appendix B. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to

Emissions Unit ID: P011

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.0002 gr PE/dscf, 0.0072 lb PE/hr, 0.032 TPY PE

Applicable Compliance Method: The 0.0002 gr PE/dscf limit is the established maximum outlet grain loading concentration for the baghouse. The permittee shall demonstrate compliance with the lbs/hr limit by multiplying the maximum baghouse outlet grain loading concentration of 0.0002 gr/dscf by the baghouse's maximum volumetric air flow rate (4200 acfm). This value is then converted to lbs/hr by multiplying lb/7000 grains and 60 minutes/hour. If required, compliance with the gr PE/dscf and lb/hr limitations shall be demonstrated in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

The TPY limit was established by multiplying the lb/hr limit by a maximum operating schedule of 8760 hours/year and ton/2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- b. Emission Limitation: 0.004 TPY Be from the entire facility

Applicable Compliance Method: The permittee shall demonstrate compliance with the TPY limit by multiplying 10 grams/day by lb/453.6 grams. This value is then converted to TPY by multiplying 365 days/year and ton/2000 lbs.

- c. Emission Limitation: Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average from the baghouse exhaust stack.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 9.

- d. Emission Limitation: Emissions shall not exceed 10 grams of beryllium over a 24 hour

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Semco

PTI A

Issued: 5/14/2002

Emissions Unit ID: **P011**

period for the entire facility

Applicable Compliance Method: Compliance with the emission limitation shall be based upon the results of the stack testing required in section E.1 of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P012 - Electric induction furnace with baghouse	OAC rule 3745-31-05(A)(3)	0.0002 gr/dscf, 0.0072 lb PE/hr, 0.032 TPY PE 0.004 TPY Be from the entire facility Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average from the baghouse exhaust stack. Control requirements (See A.2.a) See A.2.b
	OAC rule 3745-17-07(A)	See A.2.c
	OAC rule 3745-17-11(B)	See A.2.d
	40 CFR Part 61, Subpart C	Emissions shall not exceed 10 grams of beryllium over a 24 hour period for the entire facility

2. Additional Terms and Conditions

- 2.a The "Best Available Technology" (BAT) requirement for this emissions unit has been determined to be the use of a baghouse.

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PTI A

Issued: 5/14/2002

Emissions Unit ID: **P012**

- 2.b** The requirements of this rule also include compliance with the requirements of 40 CFR, Part 61, Subpart C.

- 2.c This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.d The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Marion County.

B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on weekly basis.

D. Reporting Requirements

- 1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. Pursuant to the General Provisions of 40 CFR, Part 61, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times for emissions unit P012:
 - a. a notification of the anticipated date of initial startup of the source not more than 60 days nor less than 30 days before that date; and
 - b. a notification of the actual date of initial startup of the source within 15 days after that date.

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA, Northwest District Office
347 North Dunbridge Road
Bowling Green, Ohio 43302

E. 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 90 days of startup.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for beryllium.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for beryllium, Method 104 of 40 CFR Part 61, Appendix B. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to

Emissions Unit ID: P012

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.0002 gr PE/dscf, 0.0072 lb PE/hr, 0.032 TPY PE

Applicable Compliance Method: The 0.0002 gr PE/dscf limit is the established maximum outlet grain loading concentration for the baghouse. The permittee shall demonstrate compliance with the lbs/hr limit by multiplying the maximum baghouse outlet grain loading concentration of 0.0002 gr/dscf by the baghouse's maximum volumetric air flow rate (4200 acfm). This value is then converted to lbs/hr by multiplying lb/7000 grains and 60 minutes/hour. If required, compliance with the gr PE/dscf and lb/hr limitations shall be demonstrated in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

The TPY limit was established by multiplying the lb/hr limit by a maximum operating schedule of 8760 hours/year and ton/2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- b. Emission Limitation: 0.004 TPY Be from the entire facility

Applicable Compliance Method: The permittee shall demonstrate compliance with the TPY limit by multiplying 10 grams/day by lb/453.6 grams. This value is then converted to TPY by multiplying 365 days/year and ton/2000 lbs.

- c. Emission Limitation: Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average from the baghouse exhaust stack.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 9.

- d. Emission Limitation: Emissions shall not exceed 10 grams of beryllium over a 24 hour

Semco Inc

PTI Application: 02 12778

Issued

Facility ID: 0351010070

Emissions Unit ID: **P012**

period for the entire facility

Applicable Compliance Method: Compliance with the emission limitation shall be based upon the results of the stack testing required in section E.1 of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P013 - Pouring station with baghouse	OAC rule 3745-31-05(A)(3)	0.0002 gr/dscf, 0.0073 lb PE/hr, 0.032 TPY PE 0.004 TPY Be from the entire facility Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average from the baghouse exhaust stack. Control requirements (See A.2.a)
	OAC rule 3745-17-07(A)	See A.2.b
	OAC rule 3745-17-11(B)	See A.2.c
	40 CFR Part 61, Subpart C	See A.2.d
		Emissions shall not exceed 10 grams of beryllium over a 24 hour period for the entire facility

2. Additional Terms and Conditions

- 2.a The "Best Available Technology" (BAT) requirement for this emissions unit has been determined to be the use of a baghouse.

- 2.b** The requirements of this rule also include compliance with the requirements of 40 CFR, Part 61, Subpart C.

- 2.c This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.d The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Marion County.

B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on weekly basis.

D. Reporting Requirements

- 1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. Pursuant to the General Provisions of 40 CFR, Part 61, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times for emissions unit P013:
 - a. a notification of the anticipated date of initial startup of the source not more than 60 days nor less than 30 days before that date; and
 - b. a notification of the actual date of initial startup of the source within 15 days after that date.

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Semco Inc

PTI Application: 02 12778

Issued

Facility ID: 0351010070

Emissions Unit ID: P013

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA, Northwest District Office
347 North Dunbridge Road
Bowling Green, Ohio 43302

E. 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 90 days of startup.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for beryllium.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for beryllium, Method 104 of 40 CFR Part 61, Appendix B. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.0002 gr PE/dscf, 0.0073 lb PE/hr, 0.032 TPY PE

Applicable Compliance Method: The 0.0002 gr PE/dscf limit is the established maximum outlet grain loading concentration for the baghouse. The permittee shall demonstrate compliance with the lbs/hr limit by multiplying the maximum baghouse outlet grain loading concentration of 0.0002 gr/dscf by the baghouse's maximum volumetric air flow rate (4275 acfm). This value is then converted to lbs/hr by multiplying lb/7000 grains and 60 minutes/hour. If required, compliance with the gr PE/dscf and lb/hr limitations shall be demonstrated in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

The TPY limit was established by multiplying the lb/hr limit by a maximum operating schedule of 8760 hours/year and ton/2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- b. Emission Limitation: 0.004 TPY Be from the entire facility

Applicable Compliance Method: The permittee shall demonstrate compliance with the TPY limit by multiplying 10 grams/day by lb/453.6 grams. This value is then converted to TPY by multiplying 365 days/year and ton/2000 lbs.

- c. Emission Limitation: Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average from the baghouse exhaust stack.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 9.

- d. Emission Limitation: Emissions shall not exceed 10 grams of beryllium over a 24 hour period for the entire facility

Applicable Compliance Method: Compliance with the emission limitation shall be based

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upon the results of the stack testing required in section E.1 of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P014 - Dross removal station with baghouse	OAC rule 3745-31-05(A)(3)	0.0002 gr/dscf, 0.0026 lb PE/hr, 0.011 TPY PE
		0.004 TPY Be from the entire facility
		Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average from the baghouse exhaust stack.
		Control requirements (See A.2.a)
		See A.2.b
	OAC rule 3745-17-07(A)	See A.2.c
	OAC rule 3745-17-11(B)	See A.2.d
	40 CFR Part 61, Subpart C	Emissions shall not exceed 10 grams of beryllium over a 24 hour period for the entire facility

2. Additional Terms and Conditions

- 2.a The "Best Available Technology" (BAT) requirement for this emissions unit has been determined to be the use of a baghouse.

- 2.b The requirements of this rule also include compliance with the requirements of 40 CFR, Part 61, Subpart C.
- 2.c This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.d The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Marion County.

B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on weekly basis.

D. Reporting Requirements

- 1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. Pursuant to the General Provisions of 40 CFR, Part 61, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times for emissions unit P014:
 - a. a notification of the anticipated date of initial startup of the source not more than 60 days nor less than 30 days before that date; and

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- b. a notification of the actual date of initial startup of the source within 15 days after that date.

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA, Northwest District Office
347 North Dunbridge Road
Bowling Green, Ohio 43302

E. 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 90 days of startup.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for beryllium.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for beryllium, Method 104 of 40 CFR Part 61, Appendix B. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.0002 gr PE/dscf, 0.0026 lb PE/hr, 0.011 TPY PE

Applicable Compliance Method: The 0.0002 gr PE/dscf limit is the established maximum outlet grain loading concentration for the baghouse. The permittee shall demonstrate compliance with the lbs/hr limit by multiplying the maximum baghouse outlet grain loading concentration of 0.0002 gr/dscf by the baghouse's maximum volumetric air flow rate (1500 acfm). This value is then converted to lbs/hr by multiplying lb/7000 grains and 60 minutes/hour. If required, compliance with the gr PE/dscf and lb/hr limitations shall be demonstrated in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

The TPY limit was established by multiplying the lb/hr limit by a maximum operating schedule of 8760 hours/year and ton/2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- b. Emission Limitation: 0.004 TPY Be from the entire facility

Applicable Compliance Method: The permittee shall demonstrate compliance with the TPY limit by multiplying 10 grams/day by lb/453.6 grams. This value is then converted to TPY by multiplying 365 days/year and ton/2000 lbs.

- c. Emission Limitation: Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average from the baghouse exhaust stack.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 9.

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- d. Emission Limitation: Emissions shall not exceed 10 grams of beryllium over a 24 hour period for the entire facility

Applicable Compliance Method: Compliance with the emission limitation shall be based upon the results of the stack testing required in section E.1 of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P015 - Cutting/grinding station with baghouse	OAC rule 3745-31-05(A)(3)	0.0002 gr/dscf, 0.0038 lb PE/hr, 0.017 TPY PE
		0.004 TPY Be from the entire facility
		Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average from the baghouse exhaust stack.
		Control requirements (See A.2.a)
		See A.2.b
	OAC rule 3745-17-07(A)	See A.2.c
	OAC rule 3745-17-11(B)	See A.2.d
	40 CFR Part 61, Subpart C	Emissions shall not exceed 10 grams of beryllium over a 24 hour period for the entire facility

2. Additional Terms and Conditions

- 2.a The "Best Available Technology" (BAT) requirement for this emissions unit has been determined to be the use of a baghouse.

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- 2.b** The requirements of this rule also include compliance with the requirements of 40 CFR, Part 61, Subpart C.

- 2.c This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.d The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Marion County.

B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on weekly basis.

D. Reporting Requirements

- 1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. Pursuant to the General Provisions of 40 CFR, Part 61, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times for emissions unit P015:
 - a. a notification of the anticipated date of initial startup of the source not more than 60 days nor less than 30 days before that date; and
 - b. a notification of the actual date of initial startup of the source within 15 days after that date.

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Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA, Northwest District Office
347 North Dunbridge Road
Bowling Green, Ohio 43302

E. 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 90 days of startup.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for beryllium.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for beryllium, Method 104 of 40 CFR Part 61, Appendix B. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to

ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.0002 gr PE/dscf, 0.0038 lb PE/hr, 0.017 TPY PE

Applicable Compliance Method: The 0.0002 gr PE/dscf limit is the established maximum outlet grain loading concentration for the baghouse. The permittee shall demonstrate compliance with the lbs/hr limit by multiplying the maximum baghouse outlet grain loading concentration of 0.0002 gr/dscf by the baghouse's maximum volumetric air flow rate (2200 acfm). This value is then converted to lbs/hr by multiplying lb/7000 grains and 60 minutes/hour. If required, compliance with the gr PE/dscf and lb/hr limitations shall be demonstrated in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

The TPY limit was established by multiplying the lb/hr limit by a maximum operating schedule of 8760 hours/year and ton/2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- b. Emission Limitation: 0.004 TPY Be from the entire facility

Applicable Compliance Method: The permittee shall demonstrate compliance with the TPY limit by multiplying 10 grams/day by lb/453.6 grams. This value is then converted to TPY by multiplying 365 days/year and ton/2000 lbs.

- c. Emission Limitation: Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average from the baghouse exhaust stack.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance in accordance with 40 CFR, Part 60, Appendix A, Method 9.

- d. Emission Limitation: Emissions shall not exceed 10 grams of beryllium over a 24 hour

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Emissions Unit ID: **P015**

period for the entire facility

Applicable Compliance Method: Compliance with the emission limitation shall be based upon the results of the stack testing required in section E.1 of this permit.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.