



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

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

CERTIFIED MAIL

Application No: 03-13268

DATE: 12/28/2000

Hildreth Manufacturing, LLC
Terry Hildreth
1657 Cascade Dr
Marion, OH 43302

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of \$1400 will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

NWDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT MODIFICATION OF PERMIT TO INSTALL 03-13268

Application Number: 03-13268
APS Premise Number: 0351010090
Permit Fee: **To be entered upon final issuance**
Name of Facility: Hildreth Manufacturing, LLC
Person to Contact: Terry Hildreth
Address: 1657 Cascade Dr
Marion, OH 43302

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1657 Cascade Dr
Marion, Ohio**

Description of proposed emissions unit(s):
Modification of PTI 03-3268, issued 10/6/99, to revise allowable emissions from 0.26 to 1.83 tons/year for Emissions Units P001 and P002.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Hildreth Manufacturing, LLC

Facility ID: 0351010090

PTI Application: 03-13268

Issued: To be entered upon final issuance

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 representative of the Director, upon receipt of a written request and within a reasonable time, any

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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

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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 Environmental Protection Agency if the proposed sources are inadequate 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 prove to be inadequate 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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule

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3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit..

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	1.83

Hildreth Manufacturing, LLC
 PTI # 03-12268
 Issue

Facility ID: 0351010090

Emissions Unit ID: P001

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>
Electric induction furnace #1 with baghouse	OAC rule 3745-31-05(A)(3)	0.0094 lb PE/hr, 0.041 TPY PE
		No visible particulate emissions from the baghouse exhaust stack.
		The requirements of this rule also include compliance with the requirements of 40 CFR Part 61, Subpart C.
		Control requirements (See A.2.c)
	OAC rule 3745-17-07(A)(1)	None (See A.2.a)
	OAC rule 3745-17-11(B)(2)	None (See A.2.b)
	40 CFR Part 61, Subpart C	Emissions shall not exceed 10 grams of beryllium over a 24 hour period (0.022 lb/day, 0.0040 TPY)

2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible particulate emission 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.

Hilda**PTI**Emissions Unit ID: **P001****Issued: To be entered upon final issuance**

- 2.b** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply since the facility is located in Marion county.
- 2.c** The following are control requirements for emissions unit P001: the use of a nitrogen blanket and a baghouse.

B. Operational Restrictions

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittee 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. 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 that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

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 as referenced in 40 CFR Part 52, Subpart C, Section 61.32 and for the allowable mass emission rate for particulate matter.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rates: for beryllium, Method 104 of 40 CFR Part 61, Appendix B and particulate matter, 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.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near 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

Hildt**PTI**Emissions Unit ID: **P001****Issued: To be entered upon final issuance**

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.

Records of emission tests results and other data needed to determine total emissions shall be retained at the source and made available, for inspection by the Administrator, for a minimum of 2 years.

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

- a. Emission Limitation:

0.0094 lb PE/hr, 0.041 TPY PE

Applicable Compliance Method:

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

Compliance with the annual emission limitation will be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 and dividing by 2000).

- b. Emission Limitation:

No visible particulate emissions from the baghouse exhaust stack.

Applicable Compliance Method:

40 CFR Part 60 Appendix A, Method 22

- c. Emission Limitation:

Emissions shall not exceed 10 grams of Be over a 24 hour period (which equates to 0.022 lb/day and 0.004 TPY)

Applicable Compliance Method:

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Facility ID: 0351010090

Emissions Unit ID: **P001**

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

Compliance with the annual emission limitation will be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 and dividing by 2000).

F. Miscellaneous Requirements

None.

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Emissions Unit ID: **P002**

Issued: To be entered upon final issuance

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

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>
Electric induction furnace #2 with baghouse	OAC rule 3745-31-05(A)(3)	0.0094 lb PE/hr, 0.041 TPY PE No visible particulate emissions from the baghouse exhaust stack. The requirements of this rule also include compliance with the requirements of 40 CFR Part 61, Subpart C.
	OAC rule 3745-17-07(A)(1)	Control requirements (See A.2.c) None (See A.2.a)
	OAC rule 3745-17-11(B)(2)	None (See A.2.b)
	40 CFR Part 61, Subpart C	Emissions shall not exceed 10 grams of beryllium over a 24 hour period (0.022 lb/day, 0.0040 TPY)

2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible particulate emission 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.

Hilda**PTI**Emissions Unit ID: **P002****Issued: To be entered upon final issuance**

- 2.b** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply since the facility is located in Marion county.
- 2.c** The following are control requirements for emissions unit P002: the use of a nitrogen blanket and a baghouse.

B. Operational Restrictions

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittee 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. 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 that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

E. Testing Requirements

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

Hildreth Manufacturing, LLC
PTI Application 03-12268
Issue

Facility ID: 0351010090

Emissions Unit ID: **P002**

- 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 as referenced in 40 CFR Part 52, Subpart C, Section 61.32 and for the allowable mass emission rate for particulate matter.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rates: for beryllium, Method 104 of 40 CFR Part 61, Appendix B and particulate matter, 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.
- d. The test(s) shall be conducted while the emissions unit is operating at or near 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.

Records of emission tests results and other data needed to determine total emissions shall be

Hilda**PTI**Emissions Unit ID: **P002****Issued: To be entered upon final issuance**

retained at the source and made available, for inspection by the Administrator, for a minimum of 2 years.

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

- a. Emission Limitation:

0.0094 lb PE/hr, 0.041 TPY PE

Applicable Compliance Method:

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

Compliance with the annual emission limitation will be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 and dividing by 2000).

- b. Emission Limitation:

No visible particulate emissions from the baghouse exhaust stack.

Applicable Compliance Method:

40 CFR Part 60 Appendix A, Method 22

- c. Emission Limitation:

Emissions shall not exceed 10 grams of Be over a 24 hour period (which equates to 0.022 lb/day and 0.004 TPY)

Applicable Compliance Method:

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

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Emissions Unit ID: **P002**

Issued: To be entered upon final issuance

Compliance with the annual emission limitation will be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 and dividing by 2000).

F. Miscellaneous Requirements

None.

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

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>
Pouring station with baghouse	OAC rule 3745-31-05(A)(3)	0.22 lb PE/hr, 0.98 TPY PE No visible particulate emissions from the baghouse exhaust stack. The requirements of this rule also include compliance with the requirements of 40 CFR Part 61, Subpart C.
	OAC rule 3745-17-07(A)(1)	See A.2.a
	OAC rule 3745-17-11(B)(2)	See A.2.a
	40 CFR Part 61, Subpart C	Emissions shall not exceed 10 grams of beryllium over a 24 hour period (0.022 lb/day, 0.0040 TPY)

2. Additional Terms and Conditions

- 2.a The emissions limitation based on this applicable rules is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The following are control requirements for emissions unit P003: the use of a baghouse.

Hildt**PTI**Emissions Unit ID: **P003****Issued: To be entered upon final issuance****B. Operational Restrictions**

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittee 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. 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 that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

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 as referenced in 40 CFR Part 52, Subpart C, Section 61.32 and for the allowable mass emission rate for particulate matter.
 - c. The following test method shall be employed to demonstrate compliance with the

Hild**PTI**Emissions Unit ID: **P003****Issued: To be entered upon final issuance**

allowable mass emission rates: for beryllium, Method 104 of 40 CFR Part 61, Appendix B and particulate matter, 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.

- d. The test(s) shall be conducted while the emissions unit is operating at or near 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.

Records of emission tests results and other data needed to determine total emissions shall be retained at the source and made available, for inspection by the Administrator, for a minimum of 2 years.

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

- a. Emission Limitation:

0.22 lb PE/hr, 0.98 TPY PE

Applicable Compliance Method:

Hildreth Manufacturing, LLC

PTI Application 03-12268

Issue

Facility ID: 0351010090

Emissions Unit ID: P003

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

Compliance with the annual emission limitation will be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 and dividing by 2000).

b. Emission Limitation:

No visible particulate emissions from the baghouse exhaust stack.

Applicable Compliance Method:

40 CFR Part 60 Appendix A, Method 22

c. Emission Limitation:

Emissions shall not exceed 10 grams of Be over a 24 hour period (which equates to 0.022 lb/day and 0.004 TPY)

Applicable Compliance Method:

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

Compliance with the annual emission limitation will be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 and dividing by 2000).

F. Miscellaneous Requirements

None.

Hildt**PTI**Emissions Unit ID: **P004****Issued: To be entered upon final issuance****PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]****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>
Dross removal with baghouse	OAC rule 3745-31-05(A)(3)	0.015 lb PE/hr, 0.066 TPY PE No visible particulate emissions from the baghouse exhaust stack. The requirements of this rule also include compliance with the requirements of 40 CFR Part 61, Subpart C. Control requirements (See A.2.c)
	OAC rule 3745-17-07(A)(1)	None (See A.2.a)
	OAC rule 3745-17-11(B)(2)	None (See A.2.b)
	40 CFR Part 61, Subpart C	Emissions shall not exceed 10 grams of beryllium over a 24 hour period (0.022 lb/day, 0.0040 TPY)

2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible particulate emission 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.

Hildreth Manufacturing, LLC

PTI Application 03-12268

Issue

Facility ID: 0351010090

Emissions Unit ID: P004

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply since the facility is located in Marion county.

2.c The following are control requirements for emissions unit P004: the use of a baghouse.

B. Operational Restrictions

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittee 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. 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 that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

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.

Hild**PTI**Emissions Unit ID: **P004****Issued: To be entered upon final issuance**

- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for beryllium as referenced in 40 CFR Part 52, Subpart C, Section 61.32 and for the allowable mass emission rate for particulate matter.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rates: for beryllium, Method 104 of 40 CFR Part 61, Appendix B and particulate matter, 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.
- d. The test(s) shall be conducted while the emissions unit is operating at or near 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.

Records of emission tests results and other data needed to determine total emissions shall be retained at the source and made available, for inspection by the Administrator, for a minimum of 2

Hildreth Manufacturing, LLC
PTI Application 03-12268
Issue

Facility ID: 0351010090

Emissions Unit ID: P004

years.

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

a. Emission Limitation:

0.015 lb PE/hr, 0.066 TPY PE

Applicable Compliance Method:

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

Compliance with the annual emission limitation will be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 and dividing by 2000).

b. Emission Limitation:

No visible particulate emissions from the baghouse exhaust stack.

Applicable Compliance Method:

40 CFR Part 60 Appendix A, Method 22

c. Emission Limitation:

Emissions shall not exceed 10 grams of Be over a 24 hour period (which equates to 0.022 lb/day and 0.004 TPY)

Applicable Compliance Method:

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

Compliance with the annual emission limitation will be assumed as long as compliance

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PTI /

Emissions Unit ID: **P004**

Issued: To be entered upon final issuance

with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 and dividing by 2000).

F. Miscellaneous Requirements

None.

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PTI

Emissions Unit ID: P005

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**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>
Crucible clean-out with baghouse	OAC rule 3745-31-05(A)(3)	0.0060 lb PE/hr, 0.026 TPY PE No visible particulate emissions from the baghouse exhaust stack. The requirements of this rule also include compliance with the requirements of 40 CFR Part 61, Subpart C. Control requirements (See A.2.c)
	OAC rule 3745-17-07(A)(1)	None (See A.2.a)
	OAC rule 3745-17-11(B)(2)	None (See A.2.b)
	40 CFR Part 61, Subpart C	Emissions shall not exceed 10 grams of beryllium over a 24 hour period (0.022 lb/day, 0.0040 TPY)

2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible particulate emission 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.

Hilda**PTI**Emissions Unit ID: **P005****Issued: To be entered upon final issuance**

- 2.b** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply since the facility is located in Marion county.
- 2.c** The following are control requirements for emissions unit P005: the use of a baghouse.

B. Operational Restrictions

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittee 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. 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 that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

E. Testing Requirements

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

Hildreth Manufacturing, LLC

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Issue

Facility ID: 0351010090

Emissions Unit ID: **P005**

- 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 as referenced in 40 CFR Part 52, Subpart C, Section 61.32 and for the allowable mass emission rate for particulate matter.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rates: for beryllium, Method 104 of 40 CFR Part 61, Appendix B and particulate matter, 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.
- d. The test(s) shall be conducted while the emissions unit is operating at or near 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.

Records of emission tests results and other data needed to determine total emissions shall be retained at the source and made available, for inspection by the Administrator, for a minimum of 2

Hild**PTI**Emissions Unit ID: **P005****Issued: To be entered upon final issuance**

years.

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

a. Emission Limitation:

0.0060 lb PE/hr, 0.026 TPY PE

Applicable Compliance Method:

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

Compliance with the annual emission limitation will be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 and dividing by 2000).

b. Emission Limitation:

No visible particulate emissions from the baghouse exhaust stack.

Applicable Compliance Method:

40 CFR Part 60 Appendix A, Method 22

c. Emission Limitation:

Emissions shall not exceed 10 grams of Be over a 24 hour period (which equates to 0.022 lb/day and 0.004 TPY)

Applicable Compliance Method:

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

Hildreth Manufacturing, LLC

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Issue

Facility ID: 0351010090

Emissions Unit ID: **P005**

Compliance with the annual emission limitation will be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 and dividing by 2000).

F. Miscellaneous Requirements

None.

Hildt**PTI**Emissions Unit ID: **P006****Issued: To be entered upon final issuance****PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]****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>
Shakeout operation with baghouse	OAC rule 3745-31-05(A)(3)	0.072 lb PE/hr, 0.32 TPY PE No visible particulate emissions from the baghouse exhaust stack. The requirements of this rule also include compliance with the requirements of 40 CFR Part 61, Subpart C. Control requirements (See A.2.c)
	OAC rule 3745-17-07(A)(1)	None (See A.2.a)
	OAC rule 3745-17-11(B)(2)	None (See A.2.b)
	40 CFR Part 61, Subpart C	Emissions shall not exceed 10 grams of beryllium over a 24 hour period (0.022 lb/day, 0.0040 TPY)

2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible particulate emission 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.

Hilda**PTI**Emissions Unit ID: **P006****Issued: To be entered upon final issuance**

- 2.b** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply since the facility is located in Marion county.
- 2.c** The following are control requirements for emissions unit P006: the use of a baghouse.

B. Operational Restrictions

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittee 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. 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 that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

E. Testing Requirements

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

Hildreth Manufacturing, LLC

PTI Application 03-12268

Issue

Facility ID: 0351010090

Emissions Unit ID: **P006**

- 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 as referenced in 40 CFR Part 52, Subpart C, Section 61.32 and for the allowable mass emission rate for particulate matter.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rates: for beryllium, Method 104 of 40 CFR Part 61, Appendix B and particulate matter, 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.
- d. The test(s) shall be conducted while the emissions unit is operating at or near 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.

Records of emission tests results and other data needed to determine total emissions shall be retained at the source and made available, for inspection by the Administrator, for a minimum of 2

Hild**PTI****Issued: To be entered upon final issuance**Emissions Unit ID: **P006**

years.

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

a. Emission Limitation:

0.072 lb PE/hr, 0.32 TPY PE

Applicable Compliance Method:

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

Compliance with the annual emission limitation will be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 and dividing by 2000).

b. Emission Limitation:

No visible particulate emissions from the baghouse exhaust stack.

Applicable Compliance Method:

40 CFR Part 60 Appendix A, Method 22

c. Emission Limitation:

Emissions shall not exceed 10 grams of Be over a 24 hour period (which equates to 0.022 lb/day and 0.004 TPY)

Applicable Compliance Method:

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

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Emissions Unit ID: **P006**

Issued: To be entered upon final issuance

Compliance with the annual emission limitation will be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 and dividing by 2000).

F. Miscellaneous Requirements

None.

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

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>
Core clean-out with baghouse	OAC rule 3745-31-05(A)(3)	0.031 lb PE/hr, 0.14 TPY PE No visible particulate emissions from the baghouse exhaust stack. The requirements of this rule also include compliance with the requirements of 40 CFR Part 61, Subpart C.
	OAC rule 3745-17-07(A)(1)	None (See A.2.a)
	OAC rule 3745-17-11(B)(2)	None (See A.2.b)
	40 CFR Part 61, Subpart C	Emissions shall not exceed 10 grams of beryllium over a 24 hour period (0.022 lb/day, 0.0040 TPY)

2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible particulate emission 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.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10

Hilda**PTI**Emissions Unit ID: **P007****Issued: To be entered upon final issuance**

lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply since the facility is located in Marion county.

2.c The following are control requirements for emissions unit P007: the use of a baghouse.

B. Operational Restrictions

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittee 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. 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 that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

E. Testing Requirements

Hildt**PTI**Emissions Unit ID: **P007****Issued: To be entered upon final issuance**

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 as referenced in 40 CFR Part 52, Subpart C, Section 61.32 and for the allowable mass emission rate for particulate matter.
 - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rates: for beryllium, Method 104 of 40 CFR Part 61, Appendix B and particulate matter, 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.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near 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.

Records of emission tests results and other data needed to determine total emissions shall be retained at the source and made available, for inspection by the Administrator, for a minimum of 2

Hildreth Manufacturing, LLC
PTI
Issue

Facility ID: 0351010090

Emissions Unit ID: **P007**

years.

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

a. Emission Limitation:

0.031 lb PE/hr, 0.014 0.14 TPY PE

Applicable Compliance Method:

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

Compliance with the annual emission limitation will be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 and dividing by 2000).

- b. Emission Limitation: No visible particulate emissions from the baghouse exhaust stack.

Applicable Compliance Method: 40 CFR Part 60 Appendix A, Method 22

c. Emission Limitation:

Emissions shall not exceed 10 grams of Be over a 24 hour period (which equates to 0.022 lb/day and 0.004 TPY)

Applicable Compliance Method:

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

Compliance with the annual emission limitation will be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 and dividing by 2000).

F. Miscellaneous Requirements

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None.

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Emissions Unit ID: **P008**

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

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>
Two grinders and two cut-off machines with baghouse	OAC rule 3745-31-05(A)(3)	0.050 lb PE/hr, 0.22 TPY PE No visible particulate emissions from the baghouse exhaust stack. The requirements of this rule also include compliance with the requirements of 40 CFR Part 61, Subpart C. Control requirements (See A.2.c)
	OAC rule 3745-17-07(A)(1)	None (See A.2.a)
	OAC rule 3745-17-11(B)(2)	None (See A.2.b)
	40 CFR Part 61, Subpart C	Emissions shall not exceed 10 grams of beryllium over a 24 hour period (0.022 lb/day, 0.0040 TPY)

2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible particulate emission 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.

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2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply since the facility is located in Marion county.

2.c The following are control requirements for emissions unit P008: the use of a baghouse.

B. Operational Restrictions

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittee 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. 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 that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

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.

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- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for beryllium as referenced in 40 CFR Part 52, Subpart C, Section 61.32 and for the allowable mass emission rate for particulate matter.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rates: for beryllium, Method 104 of 40 CFR Part 61, Appendix B and particulate matter, 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.
- d. The test(s) shall be conducted while the emissions unit is operating at or near 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.

Records of emission tests results and other data needed to determine total emissions shall be retained at the source and made available, for inspection by the Administrator, for a minimum of 2

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years.

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

a. Emission Limitation:

0.050 lb PE/hr, 0.22 TPY PE

Applicable Compliance Method:

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

Compliance with the annual emission limitation will be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 and dividing by 2000).

b. Emission Limitation:

No visible particulate emissions from the baghouse exhaust stack.

Applicable Compliance Method:

40 CFR Part 60 Appendix A, Method 22

c. Emission Limitation:

Emissions shall not exceed 10 grams of Be over a 24 hour period (which equates to 0.022 lb/day and 0.004 TPY)

Applicable Compliance Method:

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

Compliance with the annual emission limitation will be assumed as long as compliance

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with the hourly emission limitation is maintained (the annual emission limitation is based upon multiplying the hourly emission limitation by 8760 and dividing by 2000).

F. Miscellaneous Requirements

None.