



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: 03-16356**

**Fac ID: 0351010095**

**DATE: 6/9/2005**

Striker Alchemy, LTD  
John Rogers  
1001 Cheney Avenue  
Marion, OH 43302

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  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: USEPA

NWDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 6/9/2005  
Effective Date: 6/9/2005**

**FINAL PERMIT TO INSTALL 03-16356**

Application Number: 03-16356  
Facility ID: 0351010095  
Permit Fee: **\$5000**  
Name of Facility: Striker Alchemy, LTD  
Person to Contact: John Rogers  
Address: 1001 Cheney Avenue  
Marion, OH 43302

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

**1001 Cheney Avenue  
Marion, Ohio**

Description of proposed emissions unit(s):

**Electric arc furnace, argon oxygen decaurberization, charge handling, pouring and cooling and roadways and parking areas.**

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

## 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

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 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

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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 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**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 ninety (90) 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>
SO <sub>2</sub>	6.00
VOC	6.00
PE	12.53
Fugitive PE	14.29
NO <sub>x</sub>	15.41
CO	85.45
Pb	0.011

**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>
F001 - Paved roadways and parking areas	OAC rule 3745-31-05(A)(3)	9.15 tons fugitive particulate emissions (PE)/yr  no visible particulate emissions except for one minute during any 60-minute period  best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.f)
	OAC rule 3745-17-07(B)	See A.2.g
	OAC rule 3745-17-08(B)	See A.2.h

**2. Additional Terms and Conditions**

- 2.a The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

paved roadways: All

paved parking areas: All

- 2.b The permittee shall employ best available control measures on all paved

roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. . In accordance with the permit application, the permittee maintains that the type of traffic and the nature of the road surface is such that no controls are necessary to comply with all applicable requirements. If at anytime the type of traffic and the nature of the road surface is not sufficient to meet the above applicable requirements, the permittee shall employ best available control measures to ensure compliance..

- 2.c** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.d** The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.e** Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.f** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
- 2.g** This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.h** This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

## **B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

- 1. Except as otherwise provided in this section, the permittee shall perform inspections of the paved roadways and parking areas in accordance with the following frequencies:

<u>Paved Roadways</u>	<u>Minimum Inspection Frequency</u>
All	Once per day of operation

<u>Paved Parking Areas</u>	<u>Minimum Inspection Frequency</u>
All	Once per day of operation

- 2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
- 3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- 4. The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be updated on a calendar quarter basis within 30 days after

the end of each calendar quarter.

#### D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
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. Compliance with the emission limitations in Section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: 9.15 tons fugitive PE/yr

Applicable Compliance Method: This emission limitation was developed by multiplying emission factors from AP-42, Chapter 12.5-4 (10/86), the maximum vehicle miles traveled and dividing by 2000 lbs/ton:

- i. heavy duty trucks:  $(14 \text{ lbs PE/VMT}) (1252.68 \text{ VMT}) (\text{ton}/2000 \text{ lbs}) = 8.77 \text{ tons/yr}$
  - ii. employee parking:  $(0.78 \text{ lb PE/VMT}) (967.80 \text{ VMT}) (\text{ton}/2000 \text{ lbs}) = 0.38 \text{ tons/yr}$
- b. Emission Limitation: no visible particulate emissions except for 1 minutes during any 60-minute period from paved roadways and parking areas

Applicable Compliance Method: Compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

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**Strike**

**PTI A**

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Emissions Unit ID: **F001**

**F. Miscellaneous Requirements**

None

**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>	OAC rule 3745-17-07(A)
P901 - 6.5 tons/hr electric arc furnace with baghouse	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(B)
		OAC rule 3745-17-08(B)
		OAC rule 3745-17-11(B)
		OAC rule 3745-18-06
		40 CFR, Part 60, Subpart AAa

Applicable Emissions  
Limitations/Control Measures

See A.2.e

See A.2.f and A.2.g

2.86 lbs particulate emissions (PE)/hr, 12.53 tons PE/yr from the baghouse serving P901, P902, P903 and P904

1.61 tons fugitive PE/yr

1.37 lbs sulfur dioxide (SO<sub>2</sub>)/hr, 6.00 tons SO<sub>2</sub>/yr

1.37 lbs volatile organic compounds (VOC)/hr, 6.00 tons VOC/yr

2.67 lbs nitrogen oxides (NO<sub>x</sub>)/hr, 11.69 tons NO<sub>x</sub>/yr

14.63 lbs carbon monoxide (CO)/hr, 64.08 tons CO/yr

0.0024 lb lead (Pb)/hr, 0.011 tons Pb/yr

Visible PE shall not exceed 20% as a 3-minute average from any building opening

See A.2.a

See A.2.b

See A.2.c

See A.2.d

See A.2.e

## 2. Additional Terms and Conditions

- 2.a Best Available Technology (BAT) for this emissions unit has been determined to be the use of a direct hood, building enclosure and baghouse and also includes compliance with 40 CFR, Part 60, Subpart AAa.
- 2.b The opacity limitation specified by this rule is less stringent than the opacity limitation established pursuant to 40 CFR, Part 60, Subpart AAa.
- 2.c This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.d This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- 2.e The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.f The permittee shall not cause to be discharged into the atmosphere any gases which:
  - i. exit from the baghouse and contain PE in excess of 12 milligrams (mg)/dry standard cubic meter (dscm) [0.0052 gr/dscf];
  - ii. exit from the stack of the baghouse controlling the EAF and exhibit 3% opacity or greater; and
  - iii. exit from the melt shop due solely to the operation of the EAF and exhibit 6% opacity or greater.
- 2.g The permittee shall not cause to be discharged into the atmosphere from the dust handling system any gases which exhibit 10 percent opacity or greater, as a 6-minute average.

## B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained at the appropriate levels (in inches of H<sub>2</sub>O) established during the most recent emission testing that demonstrated that the emissions unit was in compliance.
- 2. The control system fan motor amperes and all damper positions or the volumetric flow rate

through each separately ducted hood shall be maintained at the appropriate levels established during the most recent emission testing that demonstrated that the emissions unit was in compliance.

### **C. Monitoring and/or Recordkeeping Requirements**

1. Observations of the opacity of the visible emissions from the baghouse shall be performed by a certified VE observer as follows:
  - a. Visible emission observations shall be conducted at least once per day when the furnace is operating in the melting and refining period.
  - b. Visible emission observations shall be taken in accordance with Method 9 of 40 CFR, Part 60, Appendix A, and, for at least three 6-minute periods, the opacity shall be recorded for any points(s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of the visible emissions, only one set of three 6- minute observations will be required. In this case, Method 9 observations must be made for the site of highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident.
  - c. Records shall be maintained of any 6- minute average that is in excess of the emission limitation specified in A.2.f.
2. Observations of melt shop opacity shall be performed by a certified visible emission observer as follows:
  - a. Shop opacity observations shall be conducted at least once per day when the furnace is operating in the meltdown and refining period.
  - b. Shop opacity shall be determined as the arithmetic average of 24 consecutive 15-second opacity observations of emissions from the shop taken in accordance with Method 9.
  - c. Shop opacity shall be recorded for any point(s) where visible emission are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of visible emissions, only one observation of shop opacity will be required. In this case, the shop opacity observations must be made for the site of highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident.
3. The permittee shall either: check and record the control system fan motor amperes and damper

Emissions Unit ID: P901

position on a once-per-shift basis; install, calibrate, operate and maintain a monitoring device that continuously records the volumetric flow rate through each separately ducted hood; or install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate at the control device inlet and check and record damper positions on a once-per-shift basis. The monitoring device(s) may be installed in any appropriate location in the exhaust duct such that reproducible flow rate monitoring will result. The flow rate monitoring devices shall have an accuracy of +/-10 percent over their normal operating range and shall be calibrated according to the manufacturer's instructions. The permittee may be required to demonstrate the accuracy of the monitoring devices relative to Methods 1 and 2 of Appendix A of 40 CFR Part 60.

4. When the permittee is required to demonstrate compliance with the VE limitation in section A.2.f.ii and at any other time that the Director (the appropriate Ohio EPA District Office or local air agency) may require, either the control system fan motor amperes and all damper positions or the volumetric flow rate through each separately ducted hood shall be determined during all periods in which a hood is operated for the purpose of capturing emissions from the affected facility subject to C.3.

The permittee may petition the Director for reestablishment of these parameters whenever the permittee can demonstrate to the Administrator's satisfaction that the affected facility operating conditions upon which the parameters were previously established are no longer applicable. The values of these parameters as determined during the most recent demonstration of compliance shall be maintained at the appropriate levels for each applicable period. Operation at other than baseline values may be considered by the Director (the appropriate Ohio EPA District Office or local air agency) to be unacceptable operation and maintenance of the affected facility.

5. The permittee shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture systems (i.e., pressure sensors, dampers, and damper switches). These inspections shall include observations of the physical appearance of the equipment (e.g., presence of holes in ductwork or hoods, flow constrictions caused by dents or accumulated dust in ductwork, and fan erosion. Any deficiencies shall be recorded and proper maintenance performed. The permittee may petition the Director (the appropriate Ohio EPA District Office or local air agency) to approve any alternative to monthly operational status inspections that will provide a continuous record of the operation of each emission capture system.
6. The permittee shall properly 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 a once per shift basis.
7. The permittee shall obtain a sample of the EAF baghouse dust on a monthly basis. At a minimum,

Emissions Unit ID: **P901**

the samples shall be analyzed for the magnesium, manganese, lead, zinc, and mercury contents. The results shall be reported in weight percent. This analysis shall be conducted in accordance with U.S. EPA test methods and procedures.

8. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

#### **D. Reporting Requirements**

1. The permittee shall submit semiannual written reports that:
  - a. identify all exceedances of gasses which exit from the stack of the baghouse controlling the EAF and exhibit 3% opacity or greater;
  - b. indicate a period of excess emission for opacity observations of gasses which exit from the melt shop due solely to the operation of the EAF and exhibit 6% opacity or greater. Excess emissions shall be reported in accordance with 40 CFR Part 60.7(c).

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit semiannual written reports that identify operation of control system fan motor amperes at values exceeding + 15 percent of the value established under C.4 or operation at flow rates lower than those established under C.4. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. 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. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit the results of all baghouse dust analyses. The results shall be submitted within 30 days after the analysis is completed.
5. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

#### **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 emissions testing shall be conducted within 3 months following issuance of this permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, NO<sub>x</sub>, CO, SO<sub>2</sub>, VOC and Pb.
  - c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Method 5D of 40 CFR, Part 60, Appendix A; for NO<sub>x</sub>, Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A; for CO, Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A; for SO<sub>2</sub>, Methods 1 through 4 and 6 of 40 CFR, Part 60, Appendix A; for VOC, Methods 1 through 4 and Method 18, 25 or 25A of 40

Emissions Unit ID: **P901**

CFR, Part 60, Appendix A; and Pb, Methods 1 through 4 and 12 or 29 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. Method 5D shall be used for positive-pressure fabric filters to determine the PE concentration and volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 4 hours and 4.50 dscm (160 dscf) and the sampling time shall include an integral number of heats.
  - e. The test runs shall be conducted concurrently, unless inclement weather interferes.
  - f. The tests 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.
2. During the PE testing, the permittee shall obtain the following additional information:
- a. for all heats covered by the test:
    - i. charge weights and materials, and tap weights and materials;
    - ii. heat times, including start and stop times, and a log of process operation, including periods of no operation during testing.
    - iii. control device operation log; and
  - b. The control system fan motor amperes and all damper positions or the volumetric flow rate through each separately ducted hood shall be determined during all periods in which a hood is operated for the purpose of capturing emissions from the affected facility.
3. Concurrent with the PE testing, opacity observations shall be performed to demonstrate compliance with the opacity limitations contained in A.2.f.ii and A.2.f.iii. The opacity testing shall be conducted in accordance with 40 CFR Part 60.8.

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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 tests 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 tests. 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.

The report shall also include all information required by 40 CFR 60.276a(f).

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

- a. Emission Limitation: 2.86 lbs PE/hr, 12.53 tons PE/yr from the baghouse serving P901, P902, P903 and P904

Applicable Compliance Method: The lbs/hr limitation was developed by multiplying the maximum outlet grain concentration of 0.0052 gr/dscf (established under 40 CFR, Part 60, Subpart AAa) by the maximum volumetric air flow (64,242 acfm), the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm and 60 minutes/hr. The permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A (See E.1).

The annual limitation was developed by multiplying the lbs/hr limitation, the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

- b. Emission Limitation: 1.61 tons fugitive PE/yr

Applicable Compliance Method: The annual limitation was developed by multiplying the Factor Information REtrival (FIRE version 6.25, 10-18-04) database (3-03-009-04) emission factor of 11.30 lbs/ton by the maximum annual production rate of 56,940 tons, the capture efficiency of 99.5% and dividing by 2000 lbs/ton.

- c. Emission Limitation: 1.37 lbs SO<sub>2</sub>/hr, 6.00 tons SO<sub>2</sub>

Applicable Compliance Method: The lbs/hr limitation was developed by multiplying the maximum hourly throughput rate of 6.5 tons/hr by the emission factor of 0.21 lb/ton [developed from AP-42, Section 12.5.1 (12/04)]. The permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A (See E.1).

The annual limitation was developed by multiplying the lbs/hr limitation, the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

- d. Emission Limitation: 1.37 lbs VOC/hr, 6.00 tons VOC/yr

Applicable Compliance Method: The lbs/hr limitation was developed by multiplying the maximum hourly throughput rate of 6.5 tons/hr by the emission factor of 0.21 lb/ton [developed from AP-42, Section 12.5.1 (12/04)]. The permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 1-4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A (See E.1).

The annual limitation was developed by multiplying the lbs/hr limitation, the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

- e. Emission Limitation: 2.67 lbs NOx/hr, 11.69 tons NOx/yr

Applicable Compliance Method: The lbs/hr limitation was developed by multiplying the maximum hourly throughput rate of 6.5 tons/hr by the emission factor of 0.41 lb/ton [developed from AP-42, Section 12.5.1 (12/04)]. The permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A (See E.1).

The annual limitation was developed by multiplying the lbs/hr limitation, the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

- f. Emission Limitation: 14.63 lbs CO/hr, 64.08 tons CO/yr

Applicable Compliance Method: The lbs/hr limitation was developed by multiplying the maximum hourly throughput rate of 6.5 tons/hr by the emission factor of 2.25 lbs/ton [developed from AP-42, Section 12.5.1 (12/04)]. The permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A (See E.1).

The annual limitation was developed by multiplying the lbs/hr limitation, the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

- g. Emission Limitation: 0.0024 lb Pb/hr, 0.011 tons Pb/yr

Applicable Compliance Method: The lbs/hr limitation was developed by multiplying the maximum hourly throughput rate of 6.5 tons/hr by the emission factor of 0.000375 lb/ton [developed from AP-42, Section 12.5.1 (12/04)]. The permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 1-4 and 12 or 29 of 40 CFR, Part 60, Appendix A (See E.1).

The annual limitation was developed by multiplying the lbs/hr limitation, the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

- h. Emission Limitation: Visible PE shall not exceed 20% as a 3-minute average from any

building opening

Applicable Compliance Method: If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- i. Emission Limitation: 0.0052 gr/dscf

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Method 5D of 40 CFR, Part 60, Appendix A (See E.1).

- j. Emission Limitation: 3% opacity from the exit of the EAF baghouse

Applicable Compliance Method: The permittee shall demonstrate compliance with the visible emissions limitation above pursuant to Method 9 of 40 CFR, Part 60, Appendix A.

- k. Emission Limitation: 6% opacity from the exits of the melt shop due solely to the operation of the EAF

Applicable Compliance Method: The permittee shall demonstrate compliance with the visible emissions limitation above pursuant to Method 9 of 40 CFR, Part 60, Appendix A.

## 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>	40 CFR, Part 60, Subpart AAa
P902 - 6.5 tons/hr argon oxygen decaurberization with baghouse	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-07(B)	
	OAC rule 3745-17-08(B)	
	OAC rule 3745-17-11(B)	

**Strike**

**PTI A**

**Issued: 6/9/2005**

Emissions Unit ID: **P902**

Applicable Emissions  
Limitations/Control Measures

0.0052 gr of particulate emissions (PE)/dscf, 2.86 lbs PE/hr, 12.53 tons PE/yr from the baghouse serving P901, P902, P903 and P904

1.61 tons fugitive PE/yr

0.85 lb nitrogen oxides (NO<sub>x</sub>)/hr, 3.72 tons NO<sub>x</sub>/yr

4.88 lbs carbon monoxide (CO)/hr, 21.37 tons CO/yr

Visible particulate emissions shall not exceed 20% opacity as a 3-minute average from any building opening

See A.2.a

See A.2.b

See A.2.c

See A.2.d

See A.2.e

See A.2.f and A.2.g

## 2. Additional Terms and Conditions

- 2.a Best Available Technology (BAT) for this emissions unit has been determined to be the use of a direct hood, building enclosure and baghouse and also includes compliance with 40 CFR, Part 60, Subpart AAa.
- 2.b The opacity limitation specified by this rule is less stringent than the opacity limitation established pursuant to 40 CFR, Part 60, Subpart AAa.
- 2.c This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.d This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- 2.e The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.f The permittee shall not cause to be discharged into the atmosphere any gases which:
  - i. exit from the baghouse and contain PE in excess of 12 milligrams (mg)/dry standard cubic meter (dscm) [0.0052 gr/dscf];
  - ii. exit from the stack of the baghouse controlling the EAF and exhibit 3% opacity or greater; and
  - iii. exit from the melt shop due solely to the operation of the EAF and exhibit 6% opacity or greater.
- 2.g The permittee shall not cause to be discharged into the atmosphere from the dust handling system any gases which exhibit 10 percent opacity or greater, as a 6-minute average.

## B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained at the appropriate levels (in inches of H<sub>2</sub>O) established during the most recent emission testing that demonstrated that the emissions unit was in compliance.
- 2. The control system fan motor amperes and all damper positions or the volumetric flow rate through each separately ducted hood shall be maintained at the appropriate levels established

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**Facility ID: 0351010095**

Emissions Unit ID: **P902**

during the most recent emission testing that demonstrated that the emissions unit was in compliance.

**C. Monitoring and/or Recordkeeping Requirements**

1. Observations of the opacity of the visible emissions from the baghouse shall be performed by a certified VE observer as follows:
  - a. Visible emission observations shall be conducted at least once per day when the furnace is operating in the melting and refining period.
  - b. Visible emission observations shall be taken in accordance with Method 9 of 40 CFR, Part 60, Appendix A, and, for at least three 6-minute periods, the opacity shall be recorded for any point(s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of the visible emissions, only one set of three 6- minute observations will be required. In this case, Method 9 observations must be made for the site of highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident.
  - c. Records shall be maintained of any 6- minute average that is in excess of the emission limitation specified in A.2.f.
2. Observations of melt shop opacity shall be performed by a certified visible emission observer as follows:
  - a. Shop opacity observations shall be conducted at least once per day when the furnace is operating in the meltdown and refining period.
  - b. Shop opacity shall be determined as the arithmetic average of 24 consecutive 15-second opacity observations of emissions from the shop taken in accordance with Method 9.
  - c. Shop opacity shall be recorded for any point(s) where visible emission are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of visible emissions, only one observation of shop opacity will be required. In this case, the shop opacity observations must be made for the site of highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident.
3. The permittee shall either: check and record the control system fan motor amperes and damper position on a once-per-shift basis; install, calibrate, operate and maintain a monitoring device that continuously records the volumetric flow rate through each separately ducted hood; or install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate at the control device inlet and check and record damper positions on a once-per-shift basis. The

monitoring device(s) may be installed in any appropriate location in the exhaust duct such that reproducible flow rate monitoring will result. The flow rate monitoring devices shall have an accuracy of +/-10 percent over their normal operating range and shall be calibrated according to the manufacturer's instructions. The permittee may be required to demonstrate the accuracy of the monitoring devices relative to Methods 1 and 2 of Appendix A of 40 CFR Part 60.

4. When the permittee is required to demonstrate compliance with the VE limitation in section A.2.f.ii and at any other time that the Director (the appropriate Ohio EPA District Office or local air agency) may require, either the control system fan motor amperes and all damper positions or the volumetric flow rate through each separately ducted hood shall be determined during all periods in which a hood is operated for the purpose of capturing emissions from the affected facility subject to C.3.

The permittee may petition the Director for reestablishment of these parameters whenever the permittee can demonstrate to the Administrator's satisfaction that the affected facility operating conditions upon which the parameters were previously established are no longer applicable. The values of these parameters as determined during the most recent demonstration of compliance shall be maintained at the appropriate levels for each applicable period. Operation at other than baseline values may be considered by the Director (the appropriate Ohio EPA District Office or local air agency) to be unacceptable operation and maintenance of the affected facility.

5. The permittee shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture systems (i.e., pressure sensors, dampers, and damper switches). These inspections shall include observations of the physical appearance of the equipment (e.g., presence of holes in ductwork or hoods, flow constrictions caused by dents or accumulated dust in ductwork, and fan erosion. Any deficiencies shall be recorded and proper maintenance performed. The permittee may petition the Director (the appropriate Ohio EPA District Office or local air agency) to approve any alternative to monthly operational status inspections that will provide a continuous record of the operation of each emission capture system.
6. The permittee shall properly 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 a once per shift basis.
7. The permittee shall obtain a sample of the EAF baghouse dust on a monthly basis. At a minimum, the samples shall be analyzed for the magnesium, manganese, lead, zinc, and mercury contents. The results shall be reported in weight percent. This analysis shall be conducted in accordance with U.S. EPA test methods and procedures.

8. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

#### **D. Reporting Requirements**

1. The permittee shall submit semiannual written reports that:
  - a. identify all exceedances of gasses which exit from the stack of the baghouse controlling the EAF and exhibit 3% opacity or greater;
  - b. indicate a period of excess emission for opacity observations of gasses which exit from the melt shop due solely to the operation of the EAF and exhibit 6% opacity or greater. Excess emissions shall be reported in accordance with 40 CFR Part 60.7(c).

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-

month period.

2. The permittee shall submit semiannual written reports that identify operation of control system fan motor amperes at values exceeding + 15 percent of the value established under C4 or operation at flow rates lower than those established under C.4. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. 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. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit the results of all baghouse dust analyses. The results shall be submitted within 30 days after the analysis is completed.
5. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

#### **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 emissions testing shall be conducted within 3 months following issuance of this permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, NO<sub>x</sub>, CO, SO<sub>2</sub>, VOC and Pb.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Method 5D of 40 CFR, Part 60, Appendix A; for NO<sub>x</sub>, Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A; and for CO, Methods 1 through 4 and 10 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. Method 5D shall be used for positive-pressure fabric filters to determine the PE concentration and volumetric flow rate of the effluent gas. The sampling time and sample

- volume for each run shall be at least 4 hours and 4.50 dscm (160 dscf) and the sampling time shall include an integral number of heats.
- e. The test runs shall be conducted concurrently, unless inclement weather interferes.
  - f. The tests 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.
2. During the PE testing, the permittee shall obtain the following additional information:
- a. for all heats covered by the test:
    - i. charge weights and materials, and tap weights and materials;
    - ii. heat times, including start and stop times, and a log of process operation, including periods of no operation during testing.
    - iii. control device operation log; and
  - b. The control system fan motor amperes and all damper positions or the volumetric flow rate through each separately ducted hood shall be determined during all periods in which a hood is operated for the purpose of capturing emissions from the affected facility.
3. Concurrent with the PE testing, opacity observations shall be performed to demonstrate compliance with the opacity limitations contained in A.2.f.ii and A.2.f.iii. The opacity testing shall be conducted in accordance with 40 CFR Part 60.8.

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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 tests 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 tests. 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.

The report shall also include all information required by 40 CFR 60.276a(f).

4. Compliance with the emission limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: 2.86 lbs PE/hr, 12.53 tons PE/yr from the baghouse serving P901, P902, P903 and P904

Applicable Compliance Method: The lbs/hr limitation was developed by multiplying the maximum outlet grain concentration of 0.0052 gr/dscf (established under 40 CFR, Part 60, Subpart AAa) by the maximum volumetric air flow (64,242 acfm), the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm and 60 minutes/hr. The permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A (See E.1).

The annual limitation was developed by multiplying the lbs/hr limitation, the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

- b. Emission Limitation: 1.61 tons fugitive PE/yr

Applicable Compliance Method: The annual limitation was developed by multiplying the Factor Information REtrival (FIRE version 6.25, 10-18-04) database (3-03-009-04) emission factor of 11.30 lbs/ton by the maximum annual production rate of 56,940 tons, the capture efficiency of 99.5% and dividing by 2000 lbs/ton.

- c. Emission Limitation: 0.85 lb NOx/hr, 3.72 tons NOx/yr

Applicable Compliance Method: The lbs/hr limitation was developed by multiplying the maximum hourly throughput rate of 6.5 tons/hr by the emission factor of 0.13 lb/ton [developed from AP-42, Section 12.5.1 (12/04)]. The permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with

Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A (See E.1).

The annual limitation was developed by multiplying the lbs/hr limitation, the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

- d. Emission Limitation: 4.88 lbs CO/hr, 21.37 tons CO/yr

Applicable Compliance Method: The lbs/hr limitation was developed by multiplying the maximum hourly throughput rate of 6.5 tons/hr by the emission factor of 0.75 lbs/ton [developed from AP-42, Section 12.5.1 (12/04)]. The permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A (See E.1).

The annual limitation was developed by multiplying the lbs/hr limitation, the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

- e. Emission Limitation: Visible PE shall not exceed 20% as a 3-minute average from any building opening

Applicable Compliance Method: If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- f. Emission Limitation: 0.0052 gr/dscf

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 5D of 40 CFR, Part 60, Appendix A (See E.1).

- g. Emission Limitation: 3% opacity from the exit of the EAF baghouse

Applicable Compliance Method: The permittee shall demonstrate compliance with the visible emissions limitation above pursuant to Method 9 of 40 CFR, Part 60, Appendix A.

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- h. Emission Limitation: 6% opacity from the exits of the melt shop due solely to the operation of the EAF

Applicable Compliance Method: The permittee shall demonstrate compliance with the visible emissions limitation above pursuant to Method 9 of 40 CFR, Part 60, Appendix A.

**F. Miscellaneous Requirements**

None

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PTI A

Issued: 6/9/2005

Emissions Unit ID: P903

**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>
P903 - Charge handling	OAC rule 3745-31-05(A)(3)	0.0052 gr of particulate emissions (PE)/dscf, 2.86 lbs PE/hr, 12.53 tons PE/yr from the baghouse serving P901, P902, P903 and P904  0.50 tons fugitive PE/yr  Visible particulate emissions shall not exceed 20% opacity as a 3-minute average from any building opening  See A.2.a, A.2.b and A.2.c
	OAC rule 3745-17-07(A)	See A.2.d
	OAC rule 3745-17-07(B)	See A.2.e
	OAC rule 3745-17-08(B)	See A.2.f
	OAC rule 3745-17-11(B)	See A.2.d

**2. Additional Terms and Conditions**

- 2.a Best Available Technology (BAT) for this emissions unit has been determined to be the use of a building enclosure with all egress openings closed during operation and general ventilation to baghouse and also includes compliance with 40 CFR, Part 60, Subpart AAa.

- 2.b** The permittee shall not cause to be discharged into the atmosphere any gases which:
- i. exit from the stack of the baghouse controlling the EAF and exhibit 3% opacity or greater; and
  - ii. exit from the melt shop due solely to the operation of the EAF and exhibit 6% opacity or greater.
- 2.c** The permittee shall not cause to be discharged into the atmosphere from the dust handling system any gases which exhibit 10 percent opacity or greater, as a 6-minute average.
- 2.d** This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.e** This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- 2.f** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

## **B. Operational Restrictions**

1. The permittee shall keep all egress openings in the building closed during the operation of this emission unit.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain daily records that indicate whether or not the egress openings were closed during the operation of this emission unit. If the records indicate that the egress openings were not closed, the permittee shall maintain records that show how long the egress openings were not closed and reasons why the egress openings did not remain closed during operation.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

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

#### **D. Reporting Requirements**

1. The permittee shall also submit quarterly written reports of any deviations (excursions) from the restriction to keep all egress opening closed during operation. If no deviations occurred during a quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that year. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous quarter.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

#### **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 emissions testing shall be conducted within 3 months following issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE.
- c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Method 5D 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. Method 5D shall be used for positive-pressure fabric filters to determine the PE concentration and volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 4 hours and 4.50 dscm (160 dscf) and the sampling time shall include an integral number of heats.
- e. The test runs shall be conducted concurrently, unless inclement weather interferes.
- f. The tests 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 tests 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 tests. 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.

Emissions Unit ID: P903

The report shall also include all information required by 40 CFR 60.276a(f).

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

- a. Emission Limitation: 0.0052 gr/dscf, 2.86 lbs PE/hr, 12.53 tons PE/yr from the baghouse serving P901, P902, P903 and P904

Applicable Compliance Method: The 0.0052 gr/dscf limitation is the established BAT maximum outlet concentration. The lbs/hr limitation was developed by multiplying the maximum outlet grain concentration of 0.0052 gr/dscf by the maximum volumetric air flow (64,242 acfm), the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm and 60 minutes/hr. The permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 5D of 40 CFR, Part 60, Appendix A (See E.1).

The annual limitation was developed by multiplying the lbs/hr limitation, the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

- b. Emission Limitation: 0.50 tons fugitive PE/yr

Applicable Compliance Method: The annual limitation was developed by multiplying the emission factor of 0.07 lb/ton [from "An Inventory of Foundry Emissions by Bernard S. Gutow] by the maximum annual production rate of 56,940 tons, the control efficiency of 75% [for the building enclosure] and dividing by 2000 lbs/ton.

- c. Emission Limitation: Visible PE shall not exceed 20% as a 3-minute average from any building opening

Applicable Compliance Method: If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- d. Emission Limitation: 3% opacity from the exit of the EAF baghouse

Applicable Compliance Method: The permittee shall demonstrate compliance with the visible emissions limitation above pursuant to Method 9 of 40 CFR, Part 60, Appendix A.

- e. Emission Limitation: 6% opacity from the exits of the melt shop due solely to the operation of the EAF

Applicable Compliance Method: The permittee shall demonstrate compliance with the visible emissions limitation above pursuant to Method 9 of 40 CFR, Part 60, Appendix A.

**F. Miscellaneous Requirements**

None

**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>
P904 - Continuous ingot casting	OAC rule 3745-31-05(A)(3)	0.0052 gr of particulate emissions (PE)/dscf, 2.86 lbs PE/hr, 12.53 tons PE/yr from the baghouse serving P901, P902, P903 and P904  1.42 tons fugitive PE/yr  Visible particulate emissions shall not exceed 20% opacity as a 3-minute average from any building opening  See A.2.a, A.2.b and A.2.c
	OAC rule 3745-17-07(A)	See A.2.d
	OAC rule 3745-17-07(B)	See A.2.e
	OAC rule 3745-17-08(B)	See A.2.f
	OAC rule 3745-17-11(B)	See A.2.d

**2. Additional Terms and Conditions**

- 2.a Best Available Technology (BAT) for this emissions unit has been determined to be the use of a building enclosure with all egress openings closed during operation and general ventilation to baghouse and also includes compliance with 40 CFR, Part 60, Subpart AAa.

- 2.b** The permittee shall not cause to be discharged into the atmosphere any gases which:
- i. exit from the stack of the baghouse controlling the EAF and exhibit 3% opacity or greater; and
  - ii. exit from the melt shop due solely to the operation of the EAF and exhibit 6% opacity or greater.
- 2.c** The permittee shall not cause to be discharged into the atmosphere from the dust handling system any gases which exhibit 10 percent opacity or greater, as a 6-minute average.
- 2.d** This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.e** This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- 2.f** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**B. Operational Restrictions**

1. The permittee shall keep all egress openings in the building closed during the operation of this emission unit.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain daily records that indicate whether or not the egress openings were closed during the operation of this emission unit. If the records indicate that the egress openings were not closed, the permittee shall maintain records that show how long the egress openings were not closed and reasons why the egress openings did not remain closed during operation.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;

- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

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

#### **D. Reporting Requirements**

1. The permittee shall also submit quarterly written reports of any deviations (excursions) from the restriction to keep all egress opening closed during operation. If no deviations occurred during a quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that year. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous quarter.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

#### **E. Testing Requirements**

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

**Emissions Unit ID: P904**

- a. The emissions testing shall be conducted within 3 months following issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE.
- c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Method 5D 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. Method 5D shall be used for positive-pressure fabric filters to determine the PE concentration and volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 4 hours and 4.50 dscm (160 dscf) and the sampling time shall include an integral number of heats.
- e. The test runs shall be conducted concurrently, unless inclement weather interferes.
- f. The tests 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 tests 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 tests. 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.

The report shall also include all information required by 40 CFR 60.276a(f).

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

- a. Emission Limitation: 0.0052 gr/dscf, 2.86 lbs PE/hr, 12.53 tons PE/yr from the baghouse serving P901, P902, P903 and P904

Applicable Compliance Method: The 0.0052 gr/dscf limitation is the established BAT maximum outlet concentration. The lbs/hr limitation was developed by multiplying the maximum outlet grain concentration of 0.0052 gr/dscf by the maximum volumetric air flow (64,242 acfm), the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm and 60 minutes/hr. The permittee shall demonstrate compliance with the hourly limitation by emissions testing conducted in accordance with Methods 5D of 40 CFR, Part 60, Appendix A (See E.1).

The annual limitation was developed by multiplying the lbs/hr limitation, the maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

- b. Emission Limitation: 1.42 tons fugitive PE/yr

Applicable Compliance Method: The annual limitation was developed by multiplying the emission factor of 0.20 lb/ton [developed from "Air Emissions from Permanent Mold Casting of Ductile Iron Pipe by McKinley (1994)] by the maximum annual production rate of 56,940 tons, the control efficiency of 75% [for the building enclosure] and dividing by 2000 lbs/ton.

- c. Emission Limitation: Visible PE shall not exceed 20% as a 3-minute average from any building opening

Applicable Compliance Method: If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- d. Emission Limitation: 3% opacity from the exit of the EAF baghouse

Applicable Compliance Method: The permittee shall demonstrate compliance with the visible emissions limitation above pursuant to Method 9 of 40 CFR, Part 60, Appendix A.

- e. Emission Limitation: 6% opacity from the exits of the melt shop due solely to the operation of the EAF

Applicable Compliance Method: The permittee shall demonstrate compliance with the visible emissions limitation above pursuant to Method 9 of 40 CFR, Part 60, Appendix A.

**F. Miscellaneous Requirements**

None