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

1/7/2013

Certified Mail

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

Jeff Billett
HOBART BROTHERS CO III
8585 Industry Park Drive
Piqua, OH 45356

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

Facility ID: 0855100420
Permit Number: P0112136
Permit Type: Initial Installation
County: Miami

Dear Permit Holder:

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

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

and

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
RAPCA; Indiana

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description:

   Hobart Brothers (Facility ID 0855100420) is located in Piqua (Miami County) Ohio. Hobart Brothers currently operates 23 welding wire draw benches with fabric filters as 12 emissions units P008, P009, P010, P013 – P016, P018 – P021 and P023. Hobart Brothers has applied for a permit to install and operate (PTIO) for a new tubular wire draw bench with vented to an existing fabric filter.

3. Facility Emissions and Attainment Status:

   Miami County is attainment for particulate matter. The potential uncontrolled particulate emissions from the facility are 123 tons per year. There are 12 existing emissions units, consisting of 23 draw benches and five dust collectors that already operate with federally enforceable PTIOs that limit potential particulate emissions 58.4 tons per year.

4. Source Emissions:

   All of the draw benches (new and existing) are equipped with fabric filters that have a design outlet concentration 0.01 grain particulate/dry standard cubic foot (dscf). The particulate emissions from the addition of the new draw bench will be vented to an existing fabric filter identified as DC8. DC8 is a common control device for five other emissions units (P016, P018, P019, P020 and P021). Based on the 0.01 gr/dscf and the air flow rate of the fabric filter (28,000 cubic feet per minute (cfm)) of the fabric filter particulate emissions will be limited to 2.4 pounds per hour and 10.2 tons per year (based on 8,385 maximum annual hours of operation). Therefore, this PTI will be issued as a synthetic minor PTIO to limit potential particulate emissions to 10.2 tons on a rolling 12-month basis.

5. Conclusion:

   By venting particulate emissions to an existing fabric filter that will limit potential particulate emissions to 10.2 tons per year, there will be no increase in the current facility wide potential particulate emissions and the facility will not be subject to Title V operating permit requirements.

6. Please provide additional notes or comments as necessary:

   None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
Particulate	10.2

PUBLIC NOTICE
1/7/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

HOBART BROTHERS CO III
8585 INDUSTRY PARK DRIVE,
Piqua, OH 45356
Miami County
FACILITY DESC.: Welding and Soldering Equipment Manufacturing
PERMIT #: P0112136
PERMIT TYPE: Initial Installation
PERMIT DESC: Initial Installation Permit to Install and Operate for tubular wire draw bench with fabric filter controls.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Andrew Weisman, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280. Ph: (937)225-4435

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
HOBART BROTHERS CO III

Facility ID:	0855100420
Permit Number:	P0112136
Permit Type:	Initial Installation
Issued:	1/7/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install and Operate
for
HOBART BROTHERS CO III

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Authorization

Facility ID:	0855100420
Application Number(s):	A0046251
Permit Number:	P0112136
Permit Description:	Initial Installation Permit to Install and Operate for tubular wire draw bench with fabric filter controls.
Permit Type:	Initial Installation
Permit Fee:	$400.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	1/7/2013
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

HOBART BROTHERS CO III
8585 INDUSTRY PARK DRIVE
Piqua, OH 45356

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0112136
Permit Description: Initial Installation Permit to Install and Operate for tubular wire draw bench with fabric filter controls.

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

Emissions Unit ID:	**P024**
Company Equipment ID:	M31
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Regional Air Pollution Control Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. P024, Tubular wire draw bench M31

Operations, Property and/or Equipment Description:

Tubular wire draw bench with fabric filter (DC8)

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) and OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	The particulate emissions from this emissions unit shall not exceed 0.01 grain per dry standard cubic foot of exhaust. The particulate emissions from this emissions unit shall not exceed 10.2 tons on a rolling 12-month basis. See b)(2) a., b)(2)b., b)(2)c. and c)(1).
b.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving these emissions units shall not exceed 20 percent opacity as a six-minute average.

(2) Additional Terms and Conditions

a. Compliance with the requirements of OAC rule 3745-31-05(D) shall be demonstrated by the use of a fabric filter control device, pressure drop monitoring, record keeping, reporting and compliance with the emissions limits in b)(1)a.

b. The permittee shall implement an operation and maintenance (O&M) plan for this emissions unit and its respective air pollution control system. The O&M plan shall include, but not be limited to, the specific steps taken and/or the specific items checked on a routine basis to ensure optimum operation of the emissions unit and its respective air pollution control system. The O&M plan shall be submitted to the Regional Air Pollution Control Agency upon request.

c. The fabric filter (DC8) is a common control device that receives the exhaust from emissions units P016, P018, P019, P020, P021, and P024. Because the particulate emissions limitations for these emissions units are based on the filter media employed and air flow rate through DC8, the particulate emissions limitations are individual and combined limitations for these emissions units.

c) Operational Restrictions

(1) The filter media used in the fabric filter shall be designed to limit particulate emissions to less than 0.01 grain/dry standard cubic foot of exhaust.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible 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 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 emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions 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.

e) Reporting Requirements

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

a. all exceedances of the rolling, 12-month emission limitation for particulate emissions for this emissions unit and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

(2) The permittee shall submit annual reports which specify the particulate emission rate, in tons, from this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data for each emissions unit in the annual Synthetic Minor Title V Fee Emissions Report.

The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

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

f) Testing Requirements

(1) Compliance with the emission limitation(s) in b)(1) shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

The particulate emissions from this emissions unit shall not exceed 0.01 grain per dry standard cubic foot of exhaust.

<u>Applicable Compliance Method</u>:

Compliance shall be demonstrated based on the design specifications of the filter media used in the fabric filters. If requested, compliance shall be determined by stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using

the methods and procedures specified in U.S. EPA Reference Method 5 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

The particulate emissions from this emissions unit shall not exceed 10.2 tons on a rolling 12-month basis.

Applicable Compliance Method:

The rolling 12-month emission limitations for this emissions unit is based upon the 0.01 grain/dry standard cubic foot of exhaust multiplied by the design flow rate of the fabric filter divided by 7,000 grains/pound and multiplied by 60 minutes/hour. The design air flow rate for this emissions unit and maximum hourly emissions rate are listed in the following table.

Fabric Filter	Flow rate (dscf/minute)	Particulate emissions (pounds/hour)
DC8	28,000	2.40

The rolling 12-month particulate emissions limitations were developed by multiplying the hourly emissions limit by the maximum possible annual hours of operation (8,385 hours/year), divided by 2,000 pounds per ton.

c. Emission Limitation

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average.

Applicable Compliance Method

If required, Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified with U.S. EPA Reference Method 9of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.