



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
OTTAWA COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 03-16379

Fac ID: 0362000009

DATE: 5/31/2007

Brush Wellman Inc
Troy Kajfasz
14710 W Portage River Rd S
Elmore, OH 43416

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

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

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: 5/31/2007
Effective Date: 5/31/2007

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-16379

Application Number: 03-16379
Facility ID: 0362000009
Permit Fee: **\$100**
Name of Facility: Brush Wellman Inc
Person to Contact: Troy Kajfasz
Address: 14710 W Portage River Rd S
Elmore, OH 43416

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

14710 W Portage River Rd S
Elmore, Ohio

Description of proposed emissions unit(s):

Administrative modification to change fuel from gasoline to propane for P109.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

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the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

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4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to

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the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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7. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

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- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. 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.

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12. 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.

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13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit 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 of state-only enforceable 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 state-only required 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 (i.e., postmarked) quarterly, 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. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

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The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit 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.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

6. 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.

7. Applicability

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

8. Construction Compliance Certification

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. 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>
NOx	1.04
CO	0.187
SO2	0.084
PM10	0.912
VOC	0.055
Be	0.0341

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Brust**PTI A****Modification Issued: 5/31/2007**

Emissions Unit ID: P109

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

The ambient concentration of Be in the vicinity of the facility shall not exceed 0.01 micrograms (ug)/cubic meter, averaged over a 30-day period, as specified in the National Emissions Standard for Hazardous Air Pollutants, 40 CFR 61.32 (b). The permittee shall properly operate and maintain control equipment and implement control measures for all Be emitting emissions units at the facility.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

**Brust
PTI A**

Emissions Unit ID: P109

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OAC rule 3745-21-08 (B)	<u>Applicable Emissions Limitations/Control Measures</u>	0.02 gr PM10/dry standard cubic feet (dscf), and 0.83 ton PM10/year, see A.I.2.h
OAC rule 3745-31-05(A)(3)	0.097 pound nitrogen oxides (NOx)/hour and 0.42 ton NOx/year	0.0076 lb beryllium (Be)/hr and 0.033 ton Be/year
	0.013 pound carbon monoxide (CO)/hour and 0.057 ton CO/year	Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average.
	0.0035 pound volatile organic compounds (VOC)/hour and 0.015 ton VOC/year	See A.I.2.e
	0.01 pound sulfur dioxide (SO2)/hour and 0.044 ton SO2/year	See Section A.I.2.g
		See Section A.I.2.f
OAC rule 3745-17-07(A)	0.0028 pound particulate matter less than 10 microns	See Section A. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS
OAC rule 3745-17-11(B)	(PM10)/hour and 0.012 ton PM10/year (See A.I.2.h)	
40 CFR 61.32(b)	Visible particulate emissions shall not exceed 10% opacity as a 6-minute average, except during start-up and shutdown	
	See A.I.2.a.	
	See A.I.2.b.	
	See A.I.2.b.	
	See A.I.2.c.	
	See See A.I.2.d.	

Modification Issued: 5/31/2007**2. Additional Terms and Conditions**

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-08.
- 2.b** 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.c** This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06 (B).
- 2.d** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 (B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in this permit to install.
- On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, that rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP), however, until the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- 2.e** Best available technology (BAT) control requirements for this emissions unit has been determined to be the use of a cartridge filter with a maximum outlet concentration of 0.02 gr PM10/dscf.
- 2.f** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Ottawa County.
- 2.g** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- 2.h** All emissions of particulate matter are PM10.

II. Operational Restrictions

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Facility ID: 036200000

Emissions Unit ID: P109

1. The permittee shall combust only propane in this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than propane, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. 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 egress point serving the vacuum unit for 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. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than propane was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the egress point serving the vacuum unit for this emissions unit and (b) describe any corrective actions taken to eliminate the visible 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.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
0.097 pounds NOx/hour and 0.42 ton NOx/year (engine emissions)

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying an emission factor of 14 lbs NOx/1000 gal derived from AP-42, Table 1.5-1 (revised 10/96) and a maximum hourly fuel input of 6.96 gal/hour. The annual limitation was established by multiplying the hourly emission rate by 8760 hrs/year and divided by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual limitation will be assumed.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 7 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:
0.013 pounds CO/hour and 0.057 tons CO/year (engine emissions)

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying an emission factor of 1.9 lb CO/1000 gal derived from AP-42, Table 1.5-1 (revised 10/96) and a maximum hourly fuel input of 6.96 gal/hour. The annual limitation was established by multiplying the hourly emission rate by 8760 hrs/year and divided by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual limitation will be assumed.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 10 of 40 CFR Part 60, Appendix A.

- c. Emission Limitation:
0.0035 pounds VOC/hour and 0.015 ton VOC/year (engine emissions)

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by

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multiplying an emission factor of 0.5 lb VOC/1000 gal derived from AP-42, Table 1.5-1 (revised 10/96) and a maximum hourly fuel input of 6.96 gal/hour. The annual limitation was established by multiplying the hourly emission rate by 8760 hrs/year and divided by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual limitation will be assumed.

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If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 and/or 25A, as applicable, of 40 CFR Part 60, Appendix A.

- d. Emission Limitation:
0.0028 pound PM10/hour and 0.012 ton PM10/year (engine emissions)

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying an emission factor of 0.4 lb/1000 gal derived from AP-42, Table 1.5-1 (revised 10/96) and a maximum hourly fuel input of 6.96 gal/hour. The annual limitation was established by multiplying the hourly emission rate by 8760 hrs/year and divided by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual limitation will be assumed.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- e. Emission Limitation:
0.01 pound SO₂/hour and 0.044 ton SO₂/year (engine emissions)

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying an emission factor of 1.5 lb/1000 gal derived from AP-42, Table 1.5-1 (revised 10/96) and a maximum hourly fuel input of 6.96 gal/hour. The annual limitation was established by multiplying the hourly emission rate by 8760 hrs/year and divided by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual limitation will be assumed.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 6 of 40 CFR Part 60, Appendix A.

- f. Emission Limitations:
0.02 gr PM10 /dscf, 0.83 ton PM10 /year (vacuum emissions)

Applicable Compliance Method:

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Emissions Unit ID: P109

The 0.02 gr PM10/dscf limitation was established in accordance with the manufacturer's guaranteed maximum outlet concentration for the cartridge filter. The annual limitation was established by multiplying the hourly emission rate of 0.19 lb/hr by 8760 hrs/year and divided by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual limitation will be assumed.

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If required, the permittee shall demonstrate compliance by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- g. Emission Limitations:
0.0076 lb Be/hr, 0.033 ton Be/year (vacuum emissions)

Applicable Compliance Method:

Compliance with the hourly Be limitation shall be determined by multiplying the maximum Be content of 4.0 % by the controlled PM10 emission limitation of 0.02 gr/dscf, the cartridge filter's maximum volumetric air flow rate (1,110 acfm), 60 minutes/hour, and dividing by 7000 gr/lb. The annual limitation was established by multiplying the hourly emission rate by 8760 hrs/year and divided by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual limitation will be assumed.

If required, the permittee shall demonstrate compliance with the hourly allowable Be limitation pursuant to Methods 1-4, and 29 or 104 of 40 CFR, Part 60, Appendix A.

- h. Emission Limitation:
Visible PE shall not exceed 10% opacity, as a 6-minute average, except during start-up and shutdown (engine emissions)

Applicable Compliance Method:

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

- i. Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average (vacuum emissions)

Applicable Compliance Method:

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

VI. Miscellaneous Requirements

None

Brust**PTI A****Modification Issued: 5/31/2007**

Emissions Unit ID: P109

B. State Only Enforceable Section**I. 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>
P109 - 52 H.P. - propane fired portable vacuum unit (plant property use only) (administrative modification of PTI # 03-16379 issued on 5/4/06 to change the fuel from gasoline to propane)	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

Operations, Property, <u>and/or Equipment</u>	vacuum unit emissions
P110 - 102 H.P. diesel-fired portable vacuum unit (plant property use only) (administrative modification of PTI # 03-16379 issued on 5/4/06 to remove 21-07, 23-06 terms and update 21-08 terms) engine emissions	

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<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-11 (B)(5)(a)	<u>Applicable Emissions Limitations/Control Measures</u>
OAC rule 3745-31-05 (A)(3)	OAC rule 3745-18-06 (G)	6.22 pounds nitrogen oxides (NOx)/hour
	OAC rule 3745-21-08 (B)	1.34 pounds carbon monoxide (CO)/hour
	OAC rule 3745-31-05(A)(3)	0.49 pound volatile organic compounds (VOC)/hour
		0.41 pound sulfur dioxide (SO2)/hour
		0.44 pound particulate matter less than 10 microns (PM10)/hour (See A.I.2.h)
	OAC rule 3745-31-05(C)	Visible particulate emissions shall not exceed 10% opacity as a 6-minute average, except during start-up and shutdown
	OAC rule 3745-17-07(A)	See A.I.2.a.
OAC rule 3745-31-05(C)	OAC rule 3745-17-11(B)	0.13 tons CO/rolling 12-month period
		0.62 ton NOx/rolling 12-month period
	40 CFR 61.32(b)	0.05 ton VOC/rolling 12-month period
		0.04 ton SO2/rolling 12-month period
		0.04 ton PM10/rolling 12-month period
		See A.I.2.i
OAC rule 3745-17-07 (A)		See A.I.2.b

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See A.I.2.b

See A.I.2.c

See A.I.2.d

0.02 gr PM10/dry
standard cubic feet (dscf),
see A.I.2.h

0.011 lb beryllium(Be)/hr,

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

See Section A.I.2.e

0.03 ton PM10/rolling
12-month period

0.0011 ton Be/rolling
12-month period

See A.I.2.i

See A.I.2.g

See A.I.2.f

See Section A. of Part II -
FACILITY SPECIFIC
TERMS AND
CONDITIONS

2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).

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- 2.b** 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.c** This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06 (B).
- 2.d** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 (B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, that rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP), however, until the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.e** Best available technology (BAT) control requirements for this emissions unit has been determined to be the use of a cartridge filter with a maximum outlet concentration of 0.02 gr PM10/dscf.
- 2.f** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Ottawa County.
- 2.g** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- 2.h** All emissions of particulate matter are PM10.
- 2.i** The emissions of CO and NO_x from this emissions unit shall not exceed 0.13 ton CO per rolling 12-month period and 0.62 ton NO_x per rolling 12-month period. The emission limitations are based on an annual hours of operation restriction (see A.II.2).

The 0.13 ton CO per rolling 12-month period and the 0.62 ton NO_x per rolling

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12-month period are federally enforceable limitations established for purposes of limiting potential to emit to avoid Prevention of Significant Deterioration (PSD) applicability.

The annual hours of operation restriction also effectively restricts emissions of PM10, SO2, VOC, and Be.

II. Operational Restrictions

1. The permittee shall combust only fuel oil number 2 in this emissions unit.

The oil combusted in this emissions unit shall only be fuel oil number 2, as defined by the American Society for Testing and Materials in ASTM D396-78, 89, 90, 92, 96, or 98,

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"Standard Specification for Fuel Oils". The sulfur content of the distillate oil shall contain no more than 0.5 weight percent sulfur.

2. The maximum annual hours of operation for emissions unit P110 shall not exceed 200 hours per year, based upon a rolling 12-month summation of the operating hours. To ensure enforceability during the first 12 calendar months of operation, following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

Month(s)	Maximum Allowable Hours of Operation
1	40
1-2	55
1-3	70
1-4	85
1-5	100
1-6	115
1-7	130
1-8	145
1-9	150
1-10	165
1-11	180
1-12	200

After the first 12 calendar months of operation, following the issuance of this permit, compliance with the annual hours of operation limitation shall be based upon a rolling, 12-month summation of the operating hours.

III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than fuel oil number 2, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the hours of operation;
 - b. beginning after the first 12 calendar months of operation, following issuance of

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this permit, the rolling, 12-month summation of the hours of operation.

Also, during the first 12 calendar months of operation, following issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month;

- c. the calculated month emission rate for CO using the following equation:

CO emissions in tons = (hours of operation) x (potential hourly CO emissions) x (1 ton/2000 lbs) = (A.III.2.a) x (1.34 lbs CO/hr) (1 ton/2000 lbs)

- d. the calculated month emission rate for NO_x using the following equation:

NO_x emissions in tons = (hours of operation) x (potential hourly NO_x emissions) x (1 ton/2000 lbs) = (A.III.2.a) x (6.22 lbs NO_x/hr) (1 ton/2000 lbs)

- e. beginning after the first 12 calendar months of operation, following issuance of this permit,

- i. the rolling, 12-month summation of the emission rate for CO, in tons;
- ii. the rolling, 12-month summation of the emission rate for NO_x, in tons;

Also, during the first 12 calendar months of operation, following issuance of this permit, the permittee shall record the cumulative CO emissions for each calendar month and the cumulative NO_x emissions for each calendar month.

3. 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 egress point serving the vacuum unit for 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. any corrective actions taken to eliminate the visible emissions.
4. The permittee shall use records of fuel supplier certification to demonstrate compliance with the operational restriction in section A.II.1. Records of fuel supplier certification shall include the following information:

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- a. The name of the oil supplier; and
- b. A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in A.II.1 above.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which identify any exceedances of the sulfur content fuel restriction specified in Section A.II.1.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than fuel oil number 2 was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling 12-month period limitation on hours of operation;
 - b. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative hours of operation;
 - c. the rolling 12-month emission limitation for CO.
 - d. the rolling 12-month emission limitation for NOx.

These reports shall be submitted in accordance with the reporting requirements specified in General Terms and Conditions of this permit.

4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the egress point serving the vacuum unit for this emissions unit and (b) describe any corrective actions taken to eliminate the visible 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.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
6.22 pounds NOx/hour and 0.62 ton NOx/rolling 12-month period (engine emissions)

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Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying an emission factor of 4.41 pounds NO_x/mmBtu derived from AP-42, Table 3.3-1 (revised 10/96) and a maximum heat input of 1.41 mmBtu/hour. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 7 of 40 CFR Part 60, Appendix A.

Compliance with the annual emission limitation shall be determined by the monitoring and record keeping in section A.III.2.e.

b. Emission Limitation:

1.34 pounds CO/hour and 0.13 tons CO/rolling 12-month period (engine emissions)

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying an emission factor of 0.95 pound CO/mmBtu derived from AP-42, Table 3.3-1 (revised 10/96) and a maximum heat input of 1.41 mmBtu/hour. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 10 of 40 CFR Part 60, Appendix A.

Compliance with the annual emission limitation shall be determined by the monitoring and record keeping in section A.III.2.e.

c. Emission Limitation:

0.49 pounds VOC/hour and 0.05 ton VOC/rolling 12-month period (engine emissions)

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying an emission factor of 0.35 pound VOC/mmBtu derived from AP-42, Table 3.3-1 (revised 10/96) and a maximum heat input of 1.41 mmBtu/hour. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 and/or 25A, as applicable, of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly

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limitation by the maximum hours of operation restriction of 200 hours/rolling 12-month period, and then dividing by 2000 pounds/ton. Therefore provided compliance is shown with the hourly emission limitation and the annual hours of operation restriction, compliance with the annual limitation will be assumed.

- d. Emission Limitation:
0.44 pound PM10/hour and 0.04 ton PM10/rolling 12-month period (engine emissions)

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying an

emission factor of 0.31 pound PM10/mmBtu derived from AP-42, Table 3.3-1 (revised 10/96) and a maximum heat input of 1.41 mmBtu/hour. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The annual emission limitation was established by multiplying the hourly limitation by the maximum hours of operation restriction of 200 hours/rolling 12-month period, and then dividing by 2000 pounds/ton. Therefore provided compliance is shown with the hourly emission limitation and the annual hours of operation restriction, compliance with the annual limitation will be assumed.

- e. Emission Limitation:
0.41 pound SO2/hour and 0.04 ton SO2/rolling 12-month period (engine emissions)

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying an emission factor of 0.29 pound SO2/mmBtu derived from AP-42, Table 3.3-1 (revised 10/96) and a maximum heat input of 1.41 mmBtu/hour. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 6 of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly limitation by the maximum hours of operation restriction of 200 hours/rolling 12-month period, and then dividing by 2000 pounds/ton. Therefore provided compliance is shown with the hourly emission limitation and the annual hours of operation restriction, compliance with the annual limitation will be assumed.

- f. Emission Limitations:
0.02 gr PM10 /dscf, 0.03 ton PM10 /rolling 12-month period (vacuum emissions)

Applicable Compliance Method:

The 0.02 gr PM10/dscf limitation was established in accordance with the

manufacturer's guaranteed maximum outlet concentration for the cartridge filter. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The annual emission limitation was established by multiplying the maximum cartridge filter outlet concentration of 0.02 gr/dscf, the cartridge filter's maximum volumetric air flow rate (1,600 acfm), 60 minutes/hour, lb/7000 gr, a maximum hours of operation restriction of 200 hours/rolling 12-month period, and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the maximum outlet concentration and the annual hours of operation restriction, compliance with the annual limitation will be assumed.

- g. Emission Limitations:
0.011 lb Be/hr, 0.0011 ton Be/rolling 12-month period (vacuum emissions)

Applicable Compliance Method:

Compliance with the hourly Be limitation shall be determined by multiplying the maximum Be content of 4.0 % by the controlled PM10 emission limitation of 0.02 gr/dscf, the cartridge filter's maximum volumetric air flow rate (1,600 acfm), 60 minutes/hour, and dividing by 7000 gr/lb. If required, the permittee shall demonstrate compliance with the hourly allowable Be limitation pursuant to Methods 1-4, and 29 or 104 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly limitation by the maximum hours of operation restriction of 200 hours/rolling 12-month period, and then dividing by 2000 pounds/ton. Therefore provided compliance is shown with the hourly emission limitation and the annual hours of operation restriction, compliance with the annual limitation will be assumed.

- h. Emission Limitation:
Visible PE shall not exceed 10% opacity, as a 6-minute average, except during start-up and shutdown (engine emissions)

Applicable Compliance Method:

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

- i. Emission Limitation:

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Visible particulate emissions shall not exceed 0% opacity, as a 6-minute average (vacuum emissions)

Applicable Compliance Method:

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

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. 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>
P110 - 102 H.P. diesel-fired vacuum unit (plant property use only) (administrative modification of PTI # 03-16379 issued on 5/4/06 to remove 21-07 and 23-06 terms and update 21-08 terms)	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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None

VI. Miscellaneous Requirements

None