



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
50 West Town Street, Suite 700  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

**CERTIFIED MAIL**

**RE: FINAL PERMIT TO INSTALL**

**OTTAWA COUNTY**

**Application No: 03-17251**

**Fac ID: 0362000009**

**DATE: 7/3/2007**

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

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
40 CFR Part 61, Subpart C	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

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 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



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**Permit To Install  
Terms and Conditions**

**Issue Date: 7/3/2007  
Effective Date: 7/3/2007**

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**FINAL PERMIT TO INSTALL 03-17251**

Application Number: 03-17251

Facility ID: 0362000009

Permit Fee: **\$3500**

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 establish new emission limits reflecting recent stack testing results for the Alloy Expansion Project.**

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

A handwritten signature in cursive script that reads "Chris Korleski".

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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 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.

**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 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.

**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.
  - 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.

#### **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.

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

**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**

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**

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM-10	10.864
NOx	7.36
CO	5.04
VOC	1.77
SO2	0.035
Be	0.043538

**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

### 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, and/or Equipment -(P075) - Furnace Rebuild - (administrative modification of PTI #03-10823 issued 6/14/2001 to establish stack test based PM-10 allowables)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)	<p>Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.49 lb/hr and 2.15 tons per year (TPY) (for emissions units P075, P082 and P083, combined)</p> <p>Beryllium (Be) emissions shall not exceed 0.002 lb/hr and 0.009 TPY (for emissions units P075, P082 and P083, combined)</p> <p>Visible particulate fugitive emissions shall not exceed 0% opacity, as a six minute average, from the building housing emissions units P075, P082, P083, and P086.</p> <p>See A.I.2.a, A.I.2.b and A.I.2.d.</p>
OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 % opacity, as a six minute average, from the baghouse stacks, except as provided by rule.
OAC rule 3745-17-11(B)	See A.I.2.c.
40 CFR 61.32(b)	See Section A. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

#### 2. Additional Terms and Conditions

- 2.a Best available technology (BAT) has been determined to use of a baghouse and high efficiency filter in series and a 0% opacity limit for visible particulate fugitive emissions from the building, as a six minute average.
- 2.b All particulate matter emissions are PM10.

- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).
- 2.d The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

## **II. Operational Restrictions**

None

## **III. 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, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
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 emissions shall be noted in an operations log, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

## **IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports that identify (a) all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA district office or local field office 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 (a) 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 eliminate the visible particulate emissions.

These reports shall be submitted to the appropriate Ohio EPA district office or local field office 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 in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

0.49 lb PM-10/hr, 2.15 tons PM10 /yr (for emissions units P075, P082 and P083, combined).

Applicable Compliance Method:

This emission limitation was established from the worst case hourly emission rate, based on the recent stack test result of 0.49 lb PM-10/hr for the combined stacks. The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 lb/hr limitation 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.

- b. Emission Limitations:

0.002 lb Be/hr, 0.009 ton Be/yr (for emissions units P075, P082 and P083, combined).

Applicable Compliance Method:

This emission limitation was based on a company supplied emission factor. The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 in accordance with Methods 1-4, and 29 or 104 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average from the stack serving this emissions unit.

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

d. Emission Limitation:

Visible particulate fugitive emissions shall not exceed 0% opacity, as a six minute average, from the building housing emissions units P075, P082, P083, and P086.

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

**VI. Miscellaneous Requirements**

1. For the purposes of continuing to evaluate the operational practices/emissions from this facility, the permittee shall notify OEPA if the following circumstances occur:
  - a. of any emergency event where it is necessary to operate with a single particulate control device. This notification shall be included in, and in a format consistent with, the deviation report required by condition IV.1, and,
  - b. if two induction furnaces are proposed to be operated simultaneously. This notification shall include detailed information regarding the proposed operating scenario and startup dates.
2. PTI # 03-17251 supersedes the requirements of PTI # 03-10823.

**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.

**Operations, Property, and/or Equipment -(P075) - Furnace Rebuild**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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**

None

**VI. Miscellaneous Requirements**

None

### 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, and/or Equipment -(P076) - Walking Reheat Furnace (administrative modification of PTI #03-16208 issued 12/2/2004 to reflect lower burner capacity)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)	<p>Nitrogen oxides (NO<sub>x</sub>) shall not exceed 1.68 pounds/hour and 7.36 tons per year (TPY).</p> <p>Carbon monoxide (CO) shall not exceed 1.15 pounds/hour and 5.04 TPY.</p> <p>Volatile organic compounds (VOC) shall not exceed 0.075 pound/hour and 0.32 TPY.</p> <p>Particulate matter less than 10 microns (PM<sub>10</sub>) shall not exceed 0.026 pound/hour and 0.114 TPY</p> <p>Sulfur dioxide (SO<sub>2</sub>) shall not exceed 0.008 pound/hour and 0.035 tons per year TPY</p> <p>See A.I.2.a and A.I.2.d.</p>
OAC rule 3745-17-07 (A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average.
OAC rule 3745-17-11 (B)	See A.I.2.b.
OAC rule 3745-18-06 (E)	See A.I.2.b.
OAC rule 3745-21-08 (B)	See A.I.2.c.

##### 2. Additional Terms and Conditions

- 2.a Emissions from this emissions unit are attributed solely to natural gas combustion.
- 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** 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.d** The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

## **II. Operational Restrictions**

1. The permittee shall burn only natural gas in this emissions unit.

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

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

## **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

## **V. Testing Requirements**

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

- a. Emission Limitations:  
1.68 pounds nitrogen oxides (NO<sub>x</sub>)/hour and 7.36 TPY.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the established emission factor of 0.12 pounds NO<sub>x</sub>/mmBtu\* and a maximum heat input of 13.968 mmBtu/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.

\* The 0.12 lb NO<sub>x</sub>/mmBTU was determined to be BAT in PTI # 03-9105, issued on August 7, 1996, and this emission factor was used to establish the lb/hr limitation.

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 Limitations:

1.15 pounds carbon monoxide (CO)/hour and 5.04 TPY.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying an emission factor of 84 pounds CO/mm scf derived from AP-42, Table 1.4-1 (revised 7/98) and the maximum natural gas consumption rate of 13,700 cu. ft./hr. 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 Limitations:

0.075 pound volatile organic compounds (VOC)/hour and 0.32 TPY.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying an emission factor of 5.5 pounds OC/mm scf derived from AP-42, Table 1.4-2 (revised 7/98) and the maximum natural gas consumption rate of 13,700 cu. ft./hr. 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 18. 25 or 25A, as appropriate of 40 CFR Part 60, Appendix A.

d. Emission Limitations:

0.026 pound particulate matter less than 10 microns (PM<sub>10</sub>)/hour and 0.114 TPY.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying an emission factor of 1.9 pounds PM-10/mm scf derived from AP-42, Table 1.4-2 (revised 7/98) and the maximum natural gas consumption rate of 13,700 cu. ft./hr. 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 Limitations:  
0.008 pound sulfur dioxide (SO<sub>2</sub>)/hour and 0.035 TPY.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying an emission factor of 0.6 pounds SO<sub>2</sub>/mm scf derived from AP-42, Table 1.4-2 (revised 7/98) and the maximum natural gas consumption rate of 13,700 cu. ft./hr. 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 Limitation:  
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average.

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**

1. PTI # 03-17251 supersedes the requirements of PTI # 03-16208.

**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.

**Operations, Property, and/or Equipment - (P076) - Walking Reheat Furnace**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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**

None

**VI. Miscellaneous Requirements**

None

### 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, and/or Equipment - (P077) - Hot Strip Mill - (administrative modification of PTI #03-11224 issued 5/12/1999 to establish stack test based PM-10 allowables)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 1.27 lb/hr and 5.56 tons per year (TPY).  Beryllium (Be) emissions shall not exceed 0.0032 lb/hr and 0.014 TPY.  See A.I.2.a, A.I.2.b and A.I.2.d.
OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 % opacity, as a six minute average, except as provided by rule.
OAC rule 3745-17-11(B)	See A.I.2.c.
40 CFR 61.32(b)	See Section A. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

##### 2. Additional Terms and Conditions

- 2.a Best available technology (BAT) has been determined to use of a baghouse and high efficiency filter in series.
- 2.b All particulate matter emissions are PM10.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).
- 2.d The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

##### II. Operational Restrictions

None

### III. 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, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

### IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that identify (a) all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA district office or local field office 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 in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:  
1.27 lb PM-10/hr, 5.56 tons PM10 /yr.

Applicable Compliance Method:

This emission limitation was established from the worst case hourly emission rate, based on the recent stack test result of 1.27 lb PM-10/hr for the combined stack. The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 lb/hr limitation 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.

- b. Emission Limitations:  
0.0032 lb Be/hr, 0.014 ton Be/yr.

Applicable Compliance Method:

This emission limitation was based on a company supplied emission factor. The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 in accordance with Methods 1-4, and 29 or 104 of 40 CFR, Part 60, Appendix A.

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average from the stack serving this emissions unit.

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

**VI. Miscellaneous Requirements**

1. PTI # 03-17251 supersedes the requirements of PTI # 03-11224.

**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.

**Operations, Property, and/or Equipment - (P077) - Hot Strip Mill**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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**

None

**VI. Miscellaneous Requirements**

None

### 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, and/or Equipment -(P078) - Cold Rolling Mill No. 2 - (administrative modification of PTI #03-11224 issued 5/12/1999 to establish stack test based PM-10 allowables)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.20 lb/hr and 0.88 tons per year (TPY).  Beryllium (Be) emissions shall not exceed 0.00024 lb/hr and 0.0011 TPY  See A.I.2.a, A.I.2.b and A.I.2.d.
OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 % opacity, as a six minute average, except as provided by rule.
OAC rule 3745-17-11(B)	See A.I.2.c.
40 CFR 61.32(b)	See Section A. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

##### 2. Additional Terms and Conditions

- 2.a Best available technology (BAT) has been determined to use of a baghouse and high efficiency filter in series.
- 2.b All particulate matter emissions are PM10.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).
- 2.d The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

## **II. Operational Restrictions**

None

## **III. 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, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

## **IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports that identify (a) all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA district office or local field office 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 in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitations:  
0.20 lb PM-10/hr, 0.88 tons PM10 /yr.

Applicable Compliance Method:

This emission limitation was established from the worst case hourly emission rate, based on the recent stack test result of 0.20 lb PM-10/hr for the combined stack. The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 lb/hr limitation 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.

- b. Emission Limitations:  
0.00024 lb Be/hr, 0.0011 ton Be/yr.

Applicable Compliance Method:

This emission limitation was based on a company supplied emission factor. The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 in accordance with Methods 1-4, and 29 or 104 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a 6-minute average from the stack serving this emissions unit.

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

## **VI. Miscellaneous Requirements**

1. PTI # 03-17251 supersedes the requirements of PTI # 03-11224.

**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.

**Operations, Property, and/or Equipment -(P078) - Cold Rolling Mill No. 2**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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**

None

**VI. Miscellaneous Requirements**

None

**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, and/or Equipment -(P079) - Aqueous Strip Cleaner**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compounds (VOC) shall not exceed 0.33 lb/hr and 1.45 tons per year (TPY) from solvent cleaning operations.  See sections A.I.2.a and A.I.2.b below.

**2. Additional Terms and Conditions**

- 2.a The hourly VOC emission limitation represents the potential to emit for this emissions unit. Therefore, no additional monitoring, record keeping, or compliance method calculations are necessary to ensure compliance with this emission limitation.
- 2.b Best available technology (BAT) control requirements for this emissions unit has been determined to be the use of a venturi scrubber followed by a mist eliminator. The scrubber shall meet a minimum control efficiency of 99% for VOC emissions.

**II. Operational Restrictions**

None

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

1. The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the scrubber, and the water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the static pressure drop across the scrubber, in inches of water, on a once-per-shift basis;
- b. the scrubber water flow rate, in gallons per minute (gpm), on a once-per-shift basis; and
- c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

Whenever the monitored values for the pressure drop, and water flow rate deviate from the value/ranges specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value/ranges specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop and/or scrubber water flow rate immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The following represent acceptable operating parameters for the scrubber:

The pressure drop across the venturi scrubber shall be maintained between the range of 0.5 and 2.0 inches of water, at all times while the emissions unit is in operation, or as established during the most recent performance test that demonstrated the emissions unit was in compliance.

The venturi scrubber water flow rate shall be maintained at a value of not less than 10 gpm, at all times while the emission units are in operation, or as established during the most recent performance test that demonstrated the emission units were in compliance.

These value/ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value/ranges based upon information obtained during future emission tests that demonstrate compliance with the allowable emission rates specified in the permit for this emissions unit. In addition, approved revisions to the value/ranges will not constitute a relaxation of the monitoring requirements requiring a modification of this permit but may be incorporated into the facility's Title V permit by means of a minor modification.

2. The permittee shall collect and record the following information each month for each cleaning solvent employed in emissions unit P079:
  - a. the name and identification of each cleaning solvent employed;
  - b. the number of gallons of each cleaning solvent employed;
  - c. the volatile organic compound content of each cleaning solvent, as employed, in pounds per gallon;
  - d. the total controlled volatile organic compound emission rate for all coatings, in lbs per month, calculated using the overall control efficiency; and
  - e. the annual year-to-date volatile organic compound emissions from all cleaning solvent (sum of d for each month to date from January to December).

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment (scrubber) during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the scrubber was outside of the acceptable range;
  - b. each period of time when the scrubber water flow rate deviated from the acceptable value;
  - c. an identification of each incident of deviation described in (a) and/or (b) where prompt corrective action, that would bring the pressure drop and/or water flow rate into compliance with the acceptable range/value, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) and/or (b) where proper records were not maintained for the investigation and/or the corrective action.

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 also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

## **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation  
0.33 lb VOC/hr and 1.45 ton VOC/yr from solvent cleaning operations.

### Applicable Compliance Method

The hourly emission limitation represents the potential to emit\* for this emissions unit. Therefore, no additional monitoring, record keeping, or compliance method calculations are necessary to ensure compliance with this emission limitation.

\* The potential to emit for this emissions unit is based on the use of cleaning solvent cleaning (make-up solvent) with a maximum VOC content of 0.843 pounds per gallon and a maximum usage rate of 33 gallons per hour, and a control efficiency of 99 % for the scrubber.

Compliance with the annual emission limitation shall be demonstrated through the record keeping requirements specified in section A.III.2.

## **VI. Miscellaneous Requirements**

None

**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.

**Operations, Property, and/or Equipment -(P079) - Aqueous Strip Cleaner**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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**

None

**VI. Miscellaneous Requirements**

None

### 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, and/or Equipment - (P080) - Strip Annealing/Pickling - (administrative modification of PTI #03-11224 issued 5/12/1999 to establish stack test based PM-10 allowables)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)	Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.12 lb/hr and 0.53 tons per year (TPY) (for emissions units P080 and P081, combined).  See A.I.2.a and A.I.2.d.
OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 % opacity, as a six minute average, except as provided by rule.
OAC rule 3745-17-11(B)	See A.I.2.b and A.I.2.c.

##### 2. Additional Terms and Conditions

- 2.a Best available technology (BAT) control requirements for this emissions unit has been determined to be the use of a caustic scrubber, and a shared acid scrubber with emissions unit P081. Both of the scrubbers shall meet a minimum control efficiency of 80% for PM10.
- 2.b All particulate matter emissions are PM10.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).
- 2.d The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

##### II. Operational Restrictions

None

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

1. The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across each scrubber, and the water flow rate while the emissions units are in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the static pressure drop across the scrubber, in inches of water, on a once-per-shift basis;
- b. the scrubber water flow rate, in gallons per minute (gpm), on a once-per-shift basis; and
- c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

Whenever the monitored values for the pressure drop, and water flow rate deviate from the value/ranges specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value/ranges specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop and/or scrubber water flow rate immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The following represent acceptable operating parameters for each scrubber:

The pressure drop across the caustic scrubber shall be maintained between the range of 0.5 and 3.5 inches of water, and 1.0 - 4.5 inches of water for the acid scrubber, at all times while the emissions unit is in operation, or as established during the most recent performance test that demonstrated the emissions unit was in compliance.

The caustic scrubber water flow rate shall be maintained at a value of not less than 20 gpm, and not less than 70 gpm for the acid scrubber, at all times while the emissions

units are in operation, or as established during the most recent performance test that demonstrated the emission units were in compliance.

These value/ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value/ranges based upon information obtained during future emission tests that demonstrate compliance with the allowable emission rates specified in the permit for this emissions unit. In addition, approved revisions to the value/ranges will not constitute a relaxation of the monitoring requirements requiring a modification of this permit but may be incorporated into the facility's Title V permit by means of a minor modification.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment (scrubber) during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the caustic scrubber was outside of the acceptable range;
  - b. each period of time when the pressure drop across the acid scrubber was outside of the acceptable range;
  - c. each period of time when the caustic scrubber water flow rate deviated from the acceptable value;
  - d. each period of time when the acid scrubber water flow rate deviated from the acceptable value;
  - e. an identification of each incident of deviation described in (a) and/or (b) where prompt corrective action, that would bring the pressure drop and/or water flow rate into compliance with the acceptable range/value, was determined to be necessary and was not taken; and
  - f. an identification of each incident of deviation described in (a) and/or (b) where proper records were not maintained for the investigation and/or the corrective action.

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.

#### **V. Testing Requirements**

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

**Brush Wellman Inc**  
**PTI Application: 03-17251**  
**Issued: 7/3/2007**

**Facility ID: 036200009**  
Emissions Unit ID: P080

- a. Emission Limitations:  
0.12 lb/hr and 0.53 tons per year (TPY) (for emissions units P080 and P081, combined).

Applicable Compliance Method:

This emission limitation was established from the worst case hourly emission rate, based on the recent stack test result of 0.12 lb PM-10/hr for the combined stacks. The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 lb/hr limitation 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.

- b. Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a 6-minute average from the stack serving this emissions unit.

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

**VI. Miscellaneous Requirements**

None

**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.

**Operations, Property, and/or Equipment - (P080) - Strip Annealing/Pickling**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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**

None

**VI. Miscellaneous Requirements**

None

### 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, and/or Equipment - (P081) - Strip Finish Pickling - (administrative modification of PTI #03-11224 issued 5/12/1999 to establish stack test based PM-10 allowables)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)	Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.12 lb/hr and 0.53 tons per year (TPY) (for emissions units P080 and P081, combined).  See A.I.2.a and A.I.2.d.
OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 % opacity, as a six minute average, except as provided by rule.
OAC rule 3745-17-11(B)	See A.I.2.b and A.I.2.c.

##### 2. Additional Terms and Conditions

- 2.a Best available technology (BAT) control requirements for this emissions unit has been determined to be the use of a caustic scrubber, and a shared acid scrubber with emissions unit P080. Both of the scrubbers shall meet a minimum control efficiency of 80% for PM10.
- 2.b All particulate matter emissions are PM10.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).
- 2.d The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

##### II. Operational Restrictions

None

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

1. The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across each scrubber, and the water flow rate while the emissions units are in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the static pressure drop across the scrubber, in inches of water, on a once-per-shift basis;
- b. the scrubber water flow rate, in gallons per minute (gpm), on a once-per-shift basis; and
- c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

Whenever the monitored values for the pressure drop, and water flow rate deviate from the value/ranges specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value/ranges specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop and/or scrubber water flow rate immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The following represent acceptable operating parameters for the scrubber:

The pressure drop across the caustic scrubber shall be maintained between the range of 0.5 and 3.5 inches of water, and 1.0 - 4.5 inches of water for the acid scrubber, at all times while the emissions unit is in operation, or as established during the most recent performance test that demonstrated the emissions unit was in compliance.

The caustic scrubber water flow rate shall be maintained at a value of not less than 10 gpm, and not less than 70 gpm for the acid scrubber, at all times while the emissions

units are in operation, or as established during the most recent performance test that demonstrated the emissions units were in compliance.

These value/ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value/ranges based upon information obtained during future emission tests that demonstrate compliance with the allowable emission rates specified in the permit for this emissions unit. In addition, approved revisions to the value/ranges will not constitute a relaxation of the monitoring requirements requiring a modification of this permit but may be incorporated into the facility's Title V permit by means of a minor modification.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment (scrubber) during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the caustic scrubber was outside of the acceptable range;
  - b. each period of time when the pressure drop across the acid scrubber was outside of the acceptable range;
  - c. each period of time when the caustic scrubber water flow rate deviated from the acceptable value;
  - d. each period of time when the acid scrubber water flow rate deviated from the acceptable value;
  - e. an identification of each incident of deviation described in (a) and/or (b) where prompt corrective action, that would bring the pressure drop and/or water flow rate into compliance with the acceptable range/value, was determined to be necessary and was not taken; and
  - f. an identification of each incident of deviation described in (a) and/or (b) where proper records were not maintained for the investigation and/or the corrective action.

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.

#### **V. Testing Requirements**

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

- a. Emission Limitations:  
0.12 lb/hr and 0.53 tons per year (TPY) (for emissions units P080 and P081, combined).

Applicable Compliance Method:

This emission limitation was established from the worst case hourly emission rate, based on the recent stack test result of 0.12 lb PM-10/hr for the combined stacks. The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 lb/hr limitation 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.

- b. Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a 6-minute average from the stack serving this emissions unit.

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

**VI. Miscellaneous Requirements**

None

**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.

**Operations, Property, and/or Equipment - (P081) - Strip Finish Pickling**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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**

None

**VI. Miscellaneous Requirements**

None

### 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, and/or Equipment -(P082) - Alloy Induction Furnace No. 7 - (administrative modification of PTI #03-10823 issued 6/14/2001 to establish stack test based PM-10 allowables)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)	<p>Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.49 lb/hr and 2.15 tons per year (TPY) (for emissions units P075, P082 and P083, combined).</p> <p>Beryllium (Be) emissions shall not exceed 0.002 lb/hr and 0.009 TPY (for emissions units P075, P082 and P083, combined).</p> <p>Visible particulate fugitive emissions shall not exceed 0% opacity, as a six minute average, from the building housing emissions units P075, P082, P083, and P086.</p> <p>See A.I.2.a, A.I.2.b and A.I.2.d.</p>
OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 % opacity, as a six minute average, from the baghouse stacks, except as provided by rule.
OAC rule 3745-17-11(B)	See A.I.2.c.
40 CFR 61.32(b)	See Section A. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

#### 2. Additional Terms and Conditions

- 2.a Best available technology (BAT) has been determined to use of a baghouse and high efficiency filter in series and a 0% opacity limit for visible particulate fugitive emissions from the building, as a six minute average.
- 2.b All particulate matter emissions are PM10.

- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).
- 2.d The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

## **II. Operational Restrictions**

None

## **III. 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, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- 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 emissions shall be noted in an operations log, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

## **IV. Reporting Requirements**

- 1. The permittee shall submit semiannual written reports that identify (a) all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA district office or local field office 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 (a) 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 eliminate the visible particulate emissions.

These reports shall be submitted to the appropriate Ohio EPA district office or local field office 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 in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

0.49 lb PM-10/hr, 2.15 tons PM10 /yr (for emissions units P075, P082 and P083, combined).

Applicable Compliance Method:

This emission limitation was established from the worst case hourly emission rate, based on the recent stack test result of 0.49 lb PM-10/hr for the combined stacks. The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 lb/hr limitation 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.

- b. Emission Limitations:

0.002 lb Be/hr, 0.009 ton Be/yr (for emissions units P075, P082 and P083, combined).

Applicable Compliance Method:

This emission limitation was based on a company supplied emission factor. The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 in accordance with Methods 1-4, and 29 or 104 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average from the stack serving this emissions unit.

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

d. Emission Limitation:

Visible particulate fugitive emissions shall not exceed 0% opacity, as a six minute average, from the building housing emissions units P075, P082, P083, and P086.

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

**VI. Miscellaneous Requirements**

1. For the purposes of continuing to evaluate the operational practices/emissions from this facility, the permittee shall notify OEPA if the following circumstances occur:
  - a. of any emergency event where it is necessary to operate with a single particulate control device. This notification shall be included in, and in a format consistent with, the deviation report required by condition IV.1, and,
  - b. if two induction furnaces are proposed to be operated simultaneously. This notification shall include detailed information regarding the proposed operating scenario and startup dates.
2. PTI # 03-17251 supersedes the requirements of PTI # 03-10823.

**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.

**Operations, Property, and/or Equipment - (P082) - Alloy Induction Furnace No. 7**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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**

None

**VI. Miscellaneous Requirements**

None

### 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, and/or Equipment -(P083) - Alloy Induction Furnace No. 8 - (administrative modification of PTI #03-10823 issued 6/14/2001 to establish stack test based PM-10 allowables)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)	<p>Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.49 lb/hr and 2.15 tons per year (TPY) (for emissions units P075, P082 and P083, combined).</p> <p>Beryllium (Be) emissions shall not exceed 0.002 lb/hr and 0.009 TPY (for emissions units P075, P082 and P083, combined).</p> <p>Visible particulate fugitive emissions shall not exceed 0% opacity, as a six minute average, from the building housing emissions units P075, P082, P083, and P086.</p> <p>See A.I.2.a, A.I.2.b and A.I.2.</p>
OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 % opacity, as a six minute average, from the baghouse stacks, except as provided by rule.
OAC rule 3745-17-11(B)	See A.I.2.c.
40 CFR 61.32(b)	See Section A. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

#### 2. Additional Terms and Conditions

- 2.a Best available technology (BAT) has been determined to use of a baghouse and high efficiency filter in series and a 0% opacity limit for visible particulate fugitive emissions from the building, as a six minute average.
- 2.b All particulate matter emissions are PM10.

- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).
- 2.d The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

## **II. Operational Restrictions**

None

## **III. 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, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- 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 emissions shall be noted in an operations log, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

## **IV. Reporting Requirements**

- 1. The permittee shall submit semiannual written reports that identify (a) all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA district office or local field office 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 (a) 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 eliminate the visible particulate emissions.

These reports shall be submitted to the appropriate Ohio EPA district office or local field office 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 in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

0.49 lb PM-10/hr, 2.15 tons PM10 /yr (for emissions units P075, P082 and P083, combined).

Applicable Compliance Method:

This emission limitation was established from the worst case hourly emission rate, based on the recent stack test result of 0.49 lb PM-10/hr for the combined stacks. The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 lb/hr limitation 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.

- b. Emission Limitations:

0.002 lb Be/hr, 0.009 ton Be/yr (for emissions units P075, P082 and P083, combined).

Applicable Compliance Method:

This emission limitation was based on a company supplied emission factor. The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 in accordance with Methods 1-4, and 29 or 104 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average from the stack serving this emissions unit.

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

d. Emission Limitation:

Visible particulate fugitive emissions shall not exceed 0% opacity, as a six minute average, from the building housing emissions units P075, P082, P083, and P086.

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

**VI. Miscellaneous Requirements**

1. For the purposes of continuing to evaluate the operational practices/emissions from this facility, the permittee shall notify OEPA if the following circumstances occur:
  - a. of any emergency event where it is necessary to operate with a single particulate control device. This notification shall be included in, and in a format consistent with, the deviation report required by condition IV.1, and,
  - b. if two induction furnaces are proposed to be operated simultaneously. This notification shall include detailed information regarding the proposed operating scenario and startup dates.
2. PTI # 03-17251 supersedes the requirements of PTI # 03-10823.

**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.

**Operations, Property, and/or Equipment - (P083) - Alloy Induction Furnace No. 8**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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**

None

**VI. Miscellaneous Requirements**

None

### 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, and/or Equipment - (P086) - Cast Shop No. 2 Vacuum - (administrative modification of PTI #03-10823 issued 6/14/2001 to establish stack test based PM-10 and Be allowables)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)	<p>Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.042 lb/hr and 0.18 tons per year (TPY).</p> <p>Beryllium (Be) emissions shall not exceed 0.0027 lb/hr and 0.012 TPY.</p> <p>Visible particulate fugitive emissions shall not exceed 0% opacity, as a six minute average, from the building housing emissions units P075, P082, P083, and P086.</p> <p>See A.I.2.a, A.I.2.b and A.I.2.d.</p>
OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 % opacity, as a six minute average, from the baghouse stacks, except as provided by rule.
OAC rule 3745-17-11(B)	See A.I.2.c.
40 CFR 61.32(b)	See Section A. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

##### 2. Additional Terms and Conditions

- 2.a Best available technology (BAT) has been determined to use of a baghouse and high efficiency filter in series and a 0% opacity limit for visible particulate fugitive emissions from the building, as a six minute average.
- 2.b All particulate matter emissions are PM10.

- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).
- 2.d The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

## **II. Operational Restrictions**

None

## **III. 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, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- 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 emissions shall be noted in an operations log, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

## **IV. Reporting Requirements**

- 1. The permittee shall submit semiannual written reports that identify (a) all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA district office or local field office 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 (a) 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 eliminate the visible particulate emissions.

These reports shall be submitted to the appropriate Ohio EPA district office or local field office 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 in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:  
0.042 lb PM-10/hr, 0.18 tons PM10 /yr.

Applicable Compliance Method:

This emission limitation was established from the worst case hourly emission rate, based on the recent stack test result of 0.042 lb PM-10/hr. The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 lb/hr limitation 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.

- b. Emission Limitations:  
0.0027 lb Be/hr, 0.012 ton Be/yr.

Applicable Compliance Method:

This emission limitation was established from the worst case hourly emission rate, based on the recent stack test result of 0.0027 lb Be/hr. The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 in accordance with Methods 1-4, and 29 or 104 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a 6-minute average from the stack serving this emissions unit.

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

- d. Emission Limitation:

**Brush Wellman Inc**

**PTI Application: 03-17251**

**Issued: 7/3/2007**

**Facility ID: 0362000009**

Emissions Unit ID: P086

Visible particulate fugitive emissions shall not exceed 0% opacity, as a six minute average, from the building housing emissions units P075, P082, P083, and P086.

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

**VI. Miscellaneous Requirements**

1. PTI # 03-17251 supersedes the requirements of PTI # 03-10823.

**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.

**Operations, Property, and/or Equipment -(P086) - Cast Shop No. 2 Vacuum**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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**

None

**VI. Miscellaneous Requirements**

None

### 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, and/or Equipment - (P087) - Finish Building Vacuum - (administrative modification of PTI #03-10823 issued 6/14/2001 to establish stack test based PM-10 allowables)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.042 lb/hr and 0.18 tons per year (TPY)  Beryllium (Be) emissions shall not exceed 0.0000087 lb/hr and 0.000038 TPY  See A.I.2.a, A.I.2.b and A.I.2.d.
OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 % opacity, as a six minute average, except as provided by rule.
OAC rule 3745-17-11(B)	See A.I.2.c.
40 CFR 61.32(b)	See Section A. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

##### 2. Additional Terms and Conditions

- 2.a Best available technology (BAT) has been determined to use of a baghouse and high efficiency filter in series.
- 2.b All particulate matter emissions are PM10.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).
- 2.d The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

## **II. Operational Restrictions**

None

## **III. 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, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

## **IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports that identify (a) all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA district office or local field office 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 in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitations:  
0.042 lb PM-10/hr, 0.18 tons PM10 /yr.

Applicable Compliance Method:

This emission limitation was established from the worst case hourly emission rate, based on the recent stack test result of 0.042 lb PM-10/hr of an identical source (P086). The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 lb/hr limitation 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.

- b. Emission Limitations:  
0.0000087 lb Be/hr, 0.000038 ton Be/yr.

Applicable Compliance Method:

This emission limitation was based on a company supplied emission factor. The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 in accordance with Methods 1-4, and 29 or 104 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a 6-minute average from the stack serving this emissions unit.

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

## **VI. Miscellaneous Requirements**

1. PTI # 03-17251 supersedes the requirements of PTI # 03-10823.

**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.

**Operations, Property, and/or Equipment - (P087) - Finish Building Vacuum**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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**

None

**VI. Miscellaneous Requirements**

None

### 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, and/or Equipment - (P088) - Finish Building Slab Mill No.2 - (administrative modification of PTI #03-11224 issued 5/12/1999 to establish stack test based PM-10 allowables)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.29 lb/hr and 1.27 tons per year (TPY).  Beryllium (Be) emissions shall not exceed 0.0017 lb/hr and 0.0074 TPY.  See A.I.2.a, A.I.2.b and A.I.2.d.
OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20 % opacity, as a six minute average, except as provided by rule.
OAC rule 3745-17-11(B)	See A.I.2.c.
40 CFR 61.32(b)	See Section A. of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

##### 2. Additional Terms and Conditions

- 2.a Best available technology (BAT) has been determined to use of a baghouse and high efficiency filter in series.
- 2.b All particulate matter emissions are PM10.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).
- 2.d The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

## II. Operational Restrictions

None

## III. 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, as well as the date and time the daily check was performed. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

## IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that identify (a) all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA district office or local field office 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 in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitations:  
0.29 lb PM-10/hr, 1.27 tons PM10 /yr.

Applicable Compliance Method:

This emission limitation was established from the three run average hourly emission rate, based on the recent stack test result of 0.25 lb PM-10/hr plus a 15% safety factor. The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 lb/hr limitation 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.

- b. Emission Limitations:  
0.0017 lb Be/hr, 0.0074 ton Be/yr.

Applicable Compliance Method:

This emission limitation was based on a company supplied emission factor. The annual limitation was established by multiplying 8760 hours/year and 1 ton/2000 lbs. 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 in accordance with Methods 1-4, and 29 or 104 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a 6-minute average from the stack serving this emissions unit.

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."

## **VI. Miscellaneous Requirements**

1. PTI # 03-17251 supersedes the requirements of PTI # 03-11224.

**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.

**Operations, Property, and/or Equipment - (P088) - Finish Building Slab Mill No.2**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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**

None

**VI. Miscellaneous Requirements**

None