



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

**Ohio's
2008 Revised Lead Standard
State Implementation Plan
for Fulton County Partial
Nonattainment Area**

**Prepared by:
The Ohio Environmental Protection Agency
Division of Air Pollution Control**

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Section One

Background

The United States Environmental Protection Agency (U.S. EPA) revised the National Ambient Air Quality Standard (NAAQS) for lead on November 12, 2008 (73 FR 66964) with an effective January 12, 2009. It replaced the existing lead standard of 1.5 ug/m³ with a lower standard of 0.15 ug/m³ as a rolling three-month average.

On November 22, 2010 (75 FR 71033), effective December 31, 2010, U.S. EPA promulgated the initial lead nonattainment areas for the revised lead standard across the country. The CAA Amendments requires states with lead nonattainment areas to submit a plan within eighteen months of the effective date of the designations (June 30, 2012) detailing how the lead standard will be attained by December 31, 2015.

This document is the Lead State Implementation Plan (SIP) for the partial Fulton County nonattainment area in the State of Ohio. This partial nonattainment area encompasses emissions from the Bunting Bearings LLC (herein referred to as "Bunting"). Bunting (Ohio EPA facility identification # 0326000015) is located at 200 Van Buren Street, Delta, Ohio, 43515. Figure 1 shows this lead nonattainment area's boundary, the facility location, and the monitoring network within.

Section Two

State Implementation Plan Approval and Clean Air Act Requirements

Section 110 of the CAA delineates general SIP requirements and Part D contains requirements applicable to Subpart 1 nonattainment areas. Section 110 requirements were addressed under Ohio EPA's October 12, 2011 Ohio Lead Infrastructure SIP¹ submittal. This document addresses Part D requirements for the partial Fulton County nonattainment area.

The general Part D nonattainment plan requirements are set forth in Section 172 of the CAA². Section 172(c) specifies that SIPs submitted to meet the Part D requirements must, among other things, include Reasonably Available Control Measures (RACM) (which includes Reasonably Available Control Technology (RACT)), provide for Reasonable Further Progress (RFP), include an emissions inventory, require permits for the construction and operation of major new or modified stationary sources, contain contingency measures, and meet the applicable provisions of Section 110(a)(2)³ of the CAA related to the general implementation of a new or revised NAAQS. The following sections of this document address the Section 172(c) requirements, as specified:

Section Three (monitoring and ambient air quality data)

- Addresses Section 110(a)(2)(B) monitoring

Section Four (emissions inventory)

- Addresses Section 172(c)(3) inventory
- Addresses Section 110(a)(2)(D) interstate transport

Section Five (transportation conformity)

Section Six (attainment demonstration strategy)

- Addresses Section 172(c)(1) RACM/RACT
- Addresses Section 172(c)(6) and Section 110(a)(2)(A) enforceable emission limitations, control measures along with schedules and timetables for compliance

Section Seven (reasonable further progress requirements)

- Addresses Section 172(c)(2) reasonable further progress

Section Eight (contingency measures)

- Section 172(c)(9) contingency measures

Section Nine (public participation)

¹ <http://www.epa.ohio.gov/dapc/SIP/infrastructure.aspx>

² Additional specific plan requirements for lead nonattainment areas are outlined in 40 CFR 51.117.

³ The requirements of Section 172(c)(7) (compliance with Section 110(a)(2)) were addressed as part of Ohio's October 12, 2011 Ohio Lead Infrastructure SIP submittal although some sections are again addressed in this submittal.

In addition to the above, Section 172(c)(4) requires the SIP to expressly identify and quantify the emissions, if any, of any such pollutant or pollutants which will be allowed, in accordance with Section 173(a)(1)(B), from the construction and operation of major new or modified stationary sources in each such area. The plan must demonstrate that the emissions quantified for this purpose will be consistent with the achievement of reasonable further progress and will not interfere with attainment of the lead standard by the applicable attainment date. Section 172(c)(5) requires permits for the construction and operation of new or modified major stationary sources anywhere in the nonattainment area, in accordance with Section 173.

Ohio administers a New Source Review (NSR) permitting program for major and modified sources of lead in nonattainment areas under Ohio's permit program. Permits to install cannot be issued unless the applicant can demonstrate that increased emissions from the new or modified source will not result in a violation of the NAAQS.

Ohio has SIP approved regulations regarding particulate emissions from stationary sources and regarding emissions of fugitive dust. These programs assist in reducing the potential impact on lead concentrations:

- Ohio Administrative Code (OAC) rule 3745-17-08: Restriction of emission of fugitive dust⁴.

This rule was developed to address reasonably available control measures (RACM) requirements as part of Ohio's plan for attaining the total suspended particulate (TSP) standard. This rule prohibits fugitive dust sources from being operated; or any materials handled, transported, or stored; or a building (or its appurtenances) or road to be used, constructed, altered, repaired, or demolished without taking measures or installing RACM to prevent fugitive dust from becoming airborne. The requirements only apply to fugitive dust sources located within specific geographical areas of Ohio⁵ that encompass all or a portion of 44 of the 88 Ohio counties (unless the director of Ohio EPA invokes his/her authority to require submittal, and implementation, of a control program which will bring the fugitive dust source into compliance with the requirements). These 44 areas were selected based upon Ohio EPA modeling results indicating boundaries in which the TSP standard was not being met.

- Ohio Administrative Code (OAC) rule 3745-17-07: Control of visible particulate emissions from stationary sources⁶.

This rule was developed to address reasonably available control technology/reasonably available control measures (RACT/RACM) requirements as part of Ohio's plan for attaining the TSP and PM10 standards. Among other

⁴ <http://www.epa.state.oh.us/dapc/regs/3745-17/17-08.pdf>

⁵ <http://www.epa.state.oh.us/dapc/regs/3745-17/3745-17-08App1.pdf>

⁶ <http://www.epa.state.oh.us/dapc/regs/3745-17/17-07.pdf>

requirements, this rule sets visible emissions (VE) limits for stacks and fugitive dust sources (paved roadways or parking areas, unpaved roadways or parking areas, and material storage piles, material handling operations, coke oven batteries, etc.).

- Ohio Administrative Code (OAC) rule 3745-17-11: Restrictions on particulate emissions from industrial processes⁷.

This rule addresses particulate emissions from various point sources throughout Ohio by limiting the allowable mass rate of emission of particulate matter.

As mentioned above, Ohio EPA has a SIP-approved major and minor NSR program. All new or modified sources must meet Ohio's NSR requirements. The RACM requirements for fugitive dust discussed above are often incorporated into NSR permits for both major and minor sources and also frequently for sources beyond the boundaries of the 44 areas discussed above.

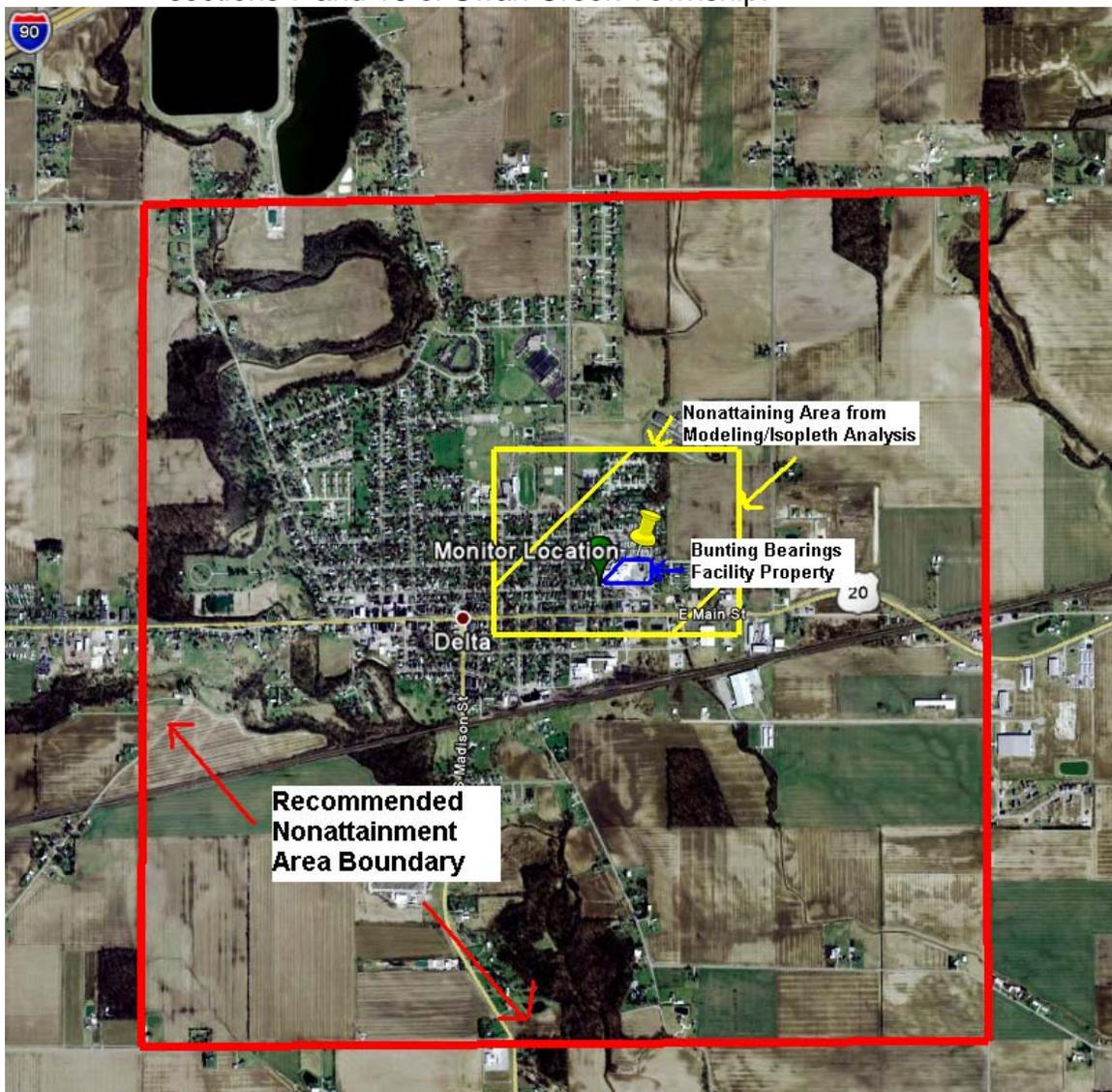
⁷ <http://www.epa.state.oh.us/dapc/regs/3745-17/17-11.pdf>

Section Three

Monitoring and Ambient Air Quality Data

Section 110(a)(2)(B) of the federal CAA requires a monitoring strategy for measuring, characterizing, and reporting lead. The Ohio EPA maintains a comprehensive network of lead air quality monitors throughout Ohio with the primary objective being to determine compliance with the lead NAAQS. Figure 1 shows Fulton County's partial nonattainment area and the location of the designated lead monitor.

Figure 1: Fulton County Partial Lead Nonattainment Area and Monitoring Network: The area enclosed by sections 12 and 13 of York Township and sections 7 and 18 of Swan Creek Township.



In accordance with the CAA Amendments, three complete years of monitoring data are required to demonstrate attainment at a monitoring site. 40 CFR Part 50, Appendix R provides the computation methods for the lead standard. This regulation requires individual samples be analyzed and a monthly mean computed. Compliance with the lead standard is determined over a three-calendar year period. Any one exceedance of a three-month average during this period indicates an exceedance of the lead standard. When this occurs, the area is said to be in attainment.

Table 1 provides a summary of the annual average lead monitoring data for 2006 through 2011 for this area's lead monitoring site. The nonattainment areas' air quality was above the standard consistently in 2006, 2007 and 2008 as can be seen by Table 1. In early 2009 the facility made some housekeeping changes and air quality subsequently began to improve. However, as can be seen in Figure 1, beginning in January 2011, monthly monitor values were observed above the 0.15 ug/m³ standard resulting in a January to March 2011 3-month rolling average in violation of the standard, 0.178 ug/m³. Ohio EPA began communicating with Bunting and performed a site visit on August 9, 2011. During this visit, several housekeeping issues were discovered as will be discussed later in this document. The monitoring data was retrieved from the U.S. EPA Air Quality System (AQS) database (Appendix A). The AQS contains ambient air pollution data collected by U.S. EPA, state, local and tribal air pollution control agencies from thousands of monitoring stations. Data from the AQS is used to assess air quality, assist in attainment/nonattainment designations, evaluate state implementation plans for nonattainment areas, perform modeling for permit review analysis, and manage other air quality management functions.

The AQS database is updated monthly by states and local environmental agencies that operate the monitoring stations. States provide the monitoring data to U.S. EPA as required by the CAA Amendments.

Table 1. Three-Month Rolling Average Lead Data (2006 – 2011) in the Fulton County Partial Nonattainment Area.

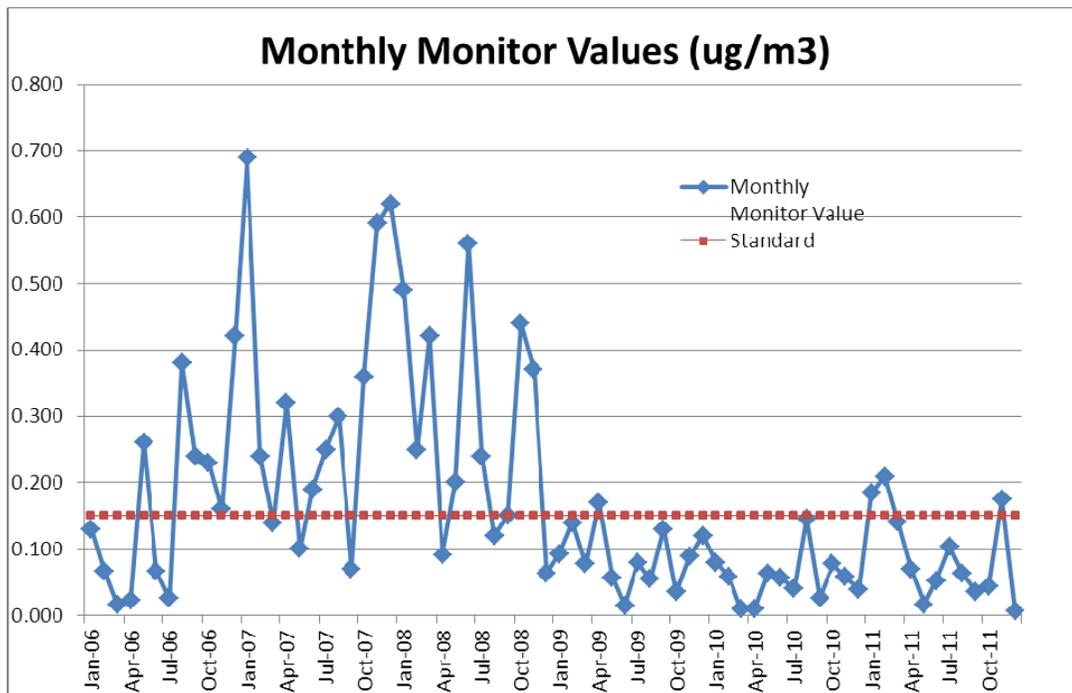
 = Exceeds standard

Site Location City	3-month period	Three-month rolling average (ug/m ³)					
		2006	2007	2008	2009	2010	2011
39-051-0001 Bunting Bearings Facility Delta, OH	Nov -Jan	0.105	0.423	0.567	0.176	0.096	0.094
	Dec -Feb	0.090	0.450	0.453	0.099	0.086	0.144
	Jan -Mar	0.071	0.357	0.387	0.103	0.049	0.178
	Feb-Apr	0.035	0.233	0.254	0.129	0.025	0.140
	Mar-May	0.100	0.186	0.237	0.101	0.027	0.076
	Apr-Jun	0.116	0.203	0.267	0.081	0.043	0.046
	May-July	0.117	0.180	0.317	0.051	0.053	0.058
	Jun-Aug	0.157	0.247	0.290	0.050	0.081	0.073
	July-Sept	0.215	0.205	0.170	0.088	0.070	0.067
	Aug-Oct	0.283	0.242	0.237	0.073	0.083	0.048
	Sept-Nov	0.210	0.339	0.320	0.085	0.054	0.085
Oct-Dec	0.270	0.523	0.291	0.081	0.058	0.075	

 Sites with one or months of a composite analysis missing in any three-month period.

Data source: U.S. EPA Air Quality System (AQS). <http://www.epa.gov/ttn/airs/airsaqs/index.htm>

Figure 2. Monthly Monitor Values (2006 – 2011) in the Fulton County Partial Nonattainment Area.



Section Four

Emissions Inventory

Section 172(c)(3) requires a comprehensive, accurate, current inventory of actual emissions from all sources of lead in the nonattainment area, including such periodic revisions as the Administrator may determine necessary to assure that the requirements of this part are met. Rule 40 CFR 51.117 requires lead emissions to be part of the state's emission inventory for the SIP.

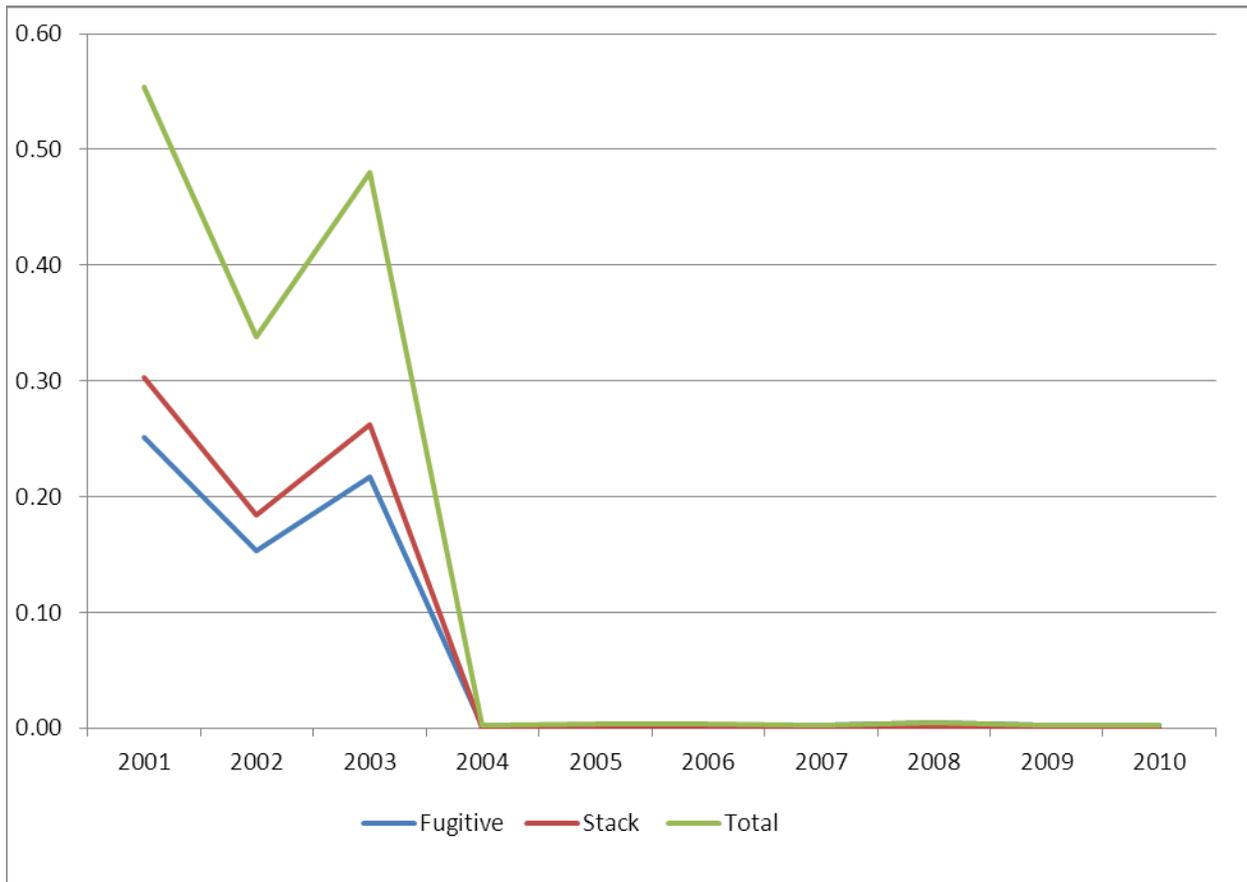
U.S. EPA guidance (2008 Lead (Pb) National Ambient Air Quality Standards (NAAQS) Implementation Questions and Answers, July 8, 2011 (herein referred to as "Q&A Guidance")) recognizes the discrepancy between the 0.5 tpy lead threshold for the Lead Monitoring Rule and the National Emissions Inventory (NEI) reporting threshold of 5 tpy. To resolve this inconsistency, U.S. EPA is considering proposing changes to align the thresholds by changing the Air Emissions Reporting Rule (AERR) in the future. However, given the discrepancy in the rules that currently exists, states are encouraged to voluntarily collect data on smaller lead sources and report the data to EPA for the 2011 NEI. The Q&A Guidance also reiterates that 40 CFR 51.117(e) states: "The point source inventory on which the summary of the baseline for Lead emission inventory is based must contain all sources that emit 0.5 or more tons of lead per year." Ohio must also submit any additional emission inventory information needed to support an attainment demonstration and a Reasonable Further Progress (RFP) plan necessary to ensure expeditious attainment of the NAAQS. Appendix B contains Ohio's complete statewide 2005 through 2008 lead emissions inventory for sources at or above the 0.5 tpy threshold. There are no sources, including Bunting, within this nonattainment area reporting emissions at this level.

Bunting is below NEI reporting thresholds and only reports lead emission data through the Toxics Release Inventory (TRI). Table 2 summarizes historical lead emissions for Bunting reported under the TRI program. Figure 2 shows the reporting of lead has trended downward since 2001.

Table 2. Bunting TRI Data (2001 – 2010).

	LEAD COMPOUNDS (TPY)		
	Fugitive	Stack	Total
2001	0.25	0.30	0.55
2002	0.15	0.18	0.34
2003	0.22	0.26	0.48
2004	0.0020	0.00050	0.0025
2005	0.0030	0.00050	0.0035
2006	0.0030	0.00050	0.0035
2007	0.0025	0.00050	0.0030
2008	0.0045	0.00050	0.0050
2009	0.0025	0.00050	0.0030
2010	0.0025	0.00050	0.0030

Figure 3. Bunting TRI Data (2001 – 2010) Trends in Tons Per Year.



Ohio EPA's October 12, 2011 Ohio Lead Infrastructure SIP⁸ submittal discusses sources of lead emissions in relation to potential interstate transport (Section 110(a)(2)(D)). U.S. EPA has stated that lead emissions do not generally transport over long distances. Ohio EPA found that there are no significant sources of lead emissions in close proximity to Ohio's borders that could contribute to nonattainment in another state.

As part of the review for the new lead standard, U.S. EPA analyzed sources of lead across the country, primarily based upon the 2002 National NEI. Point source emissions account for about 66% of the national lead emissions in the 2002 NEI. The point source emissions are roughly split between combustion and industrial processes, while mobile and nonroad sources (emissions associated with general aviation aircraft leaded fuel) account for 29%. While lead is not added to jet fuel that is used in commercial aircraft, military aircraft, or other turbine engine aircraft, currently lead is still added to aviation gasoline used in most piston-engine aircraft and some types of race cars (which use alkyl-lead additives to boost octane). Currently, there are two main types of leaded aviation gasoline that differ in lead content (1.12 grams lead per liter (g Pb/L) vs. 0.56 g Pb/L) with the majority used being comprised of the lower lead content aviation gasoline. In 2002 approximately 280 million gallons of aviation gasoline were supplied nationwide contributing an estimated 491 tons of lead to the air and comprising 29% of the national lead inventory.

Only point sources emissions, specifically from Bunting are addressed as a part of this submittal. This nonattainment area does not contain any additional sources of lead emissions that warrant inclusion in this analysis.

In Ohio, major point sources in all counties are required to submit air emissions information annually, in accordance with U.S. EPA's AERR. Ohio EPA prepares a new periodic inventory for lead every three years. These lead inventories will be prepared for future years as necessary to comply with the inventory reporting requirements established in the CFR.

⁹ U.S. EPA's "Review of the National Ambient Air Quality Standard for Lead: Policy Assessment of Scientific and Technical Information," November 2007.

Section Five

Transportation Conformity

Transportation conformity is required under CAA Section 176(c) (42 U.S.C. 7506(c)) to ensure that federally supported highway and transit project activities are consistent with (“conform to”) the purpose of the SIP. Transportation conformity applies to areas that are designated nonattainment, and those areas redesignated to attainment after 1990 (“maintenance areas” with plans developed under CAA section 175A) for transportation-related criteria pollutants. In light of the elimination of Pb additives from gasoline, transportation conformity does not apply to the lead NAAQS (73 FR 67043).

Section Six

Reasonably Available Control Measures

Section 172(c)(1) requires plan provisions provide for implementation of Reasonably Available Control Measures (RACM) as expeditiously as practicable (including such reductions in emissions from existing sources in the area as may be obtained through the adoption, at a minimum, of Reasonably Available Control Technology (RACT)) and provide for attainment of the national primary ambient air quality standards. In March 2012, U.S. EPA issued guidance entitled “Implementation of the 2008 Lead National Ambient Air Quality Standards: Guide to Developing Reasonably Available Control Measures (RACM) for Controlling Lead Emissions” (herein referred to as “RACM Guidance”). The RACM Guidance states that “most sources that will be required to implement RACM will be in the source categories focused on by this document – Secondary Lead Smelting, Lead Acid Battery Manufacturing, Iron and Steel Foundries, and Iron and Steel Mills. However, there might be some sources in other source categories that will be required to implement RACM for controlling lead emissions.” The RACM Guidance provides basic steps that States can use in determining what constitutes RACM. Ohio EPA has performed a RACM analysis (Appendix C) for Bunting and has determined that existing controls and practices constitutes RACM, and that those existing controls and practices along with additional housekeeping and preventative maintenance practices being implemented by Bunting to address the 2011 exceedances will ensure attainment of the standard. These measures are discussed in greater detail under the Control Measures, Means or Techniques heading of the Attainment Demonstration Strategy portion of this section.¹⁰

Section 172(c)(6) requires plan provisions include enforceable emission limitations, and such other control measures, means or techniques, as well as schedules and timetables for compliance, as may be necessary or appropriate to provide for attainment by the applicable attainment date (December 31, 2015). U.S. EPA’s Q&A Guidance states:

Control measures for the 2008 NAAQS need to be in place as expeditiously as practicable. In order for control measures to result in three years of monitored clean data by the attainment date, areas designated in the first round of designations (effective December 31, 2010, and requiring attainment demonstrations that show that the area will attain the standard as expeditiously as practicable, but no later than December 31, 2015) would need to have all necessary controls in place no later than November 1, 2012. EPA will consider on a case-by-case basis the approvability of attainment demonstration SIPs where control measures are scheduled to be operational after November 1, 2012.

¹⁰ The RACM Guidance erroneously identified Northstar Bluescope Steel as necessitating a RACM analysis. However, this source is not located in the nonattainment area. This error been communicated to U.S. EPA.

Section 172(c)(6) requirements are discussed in greater detail under the Attainment Demonstration Strategy portion of this section.

Attainment Demonstration Strategy

Background

Bunting manufactures continuous cast and centrifugal cast products in copper based alloys (typically bronze) which contain various percentages of lead. The lead component is integral in most of Bunting's products in that it adds machineability to the characteristics of bronze. A typical process flow would include the melting of the metal, the addition of alloys in the appropriate percentages, the pouring and casting of the material into various shapes, and after cooling, the machining of the material into the desired product.

As seen under Table 1 and Figure 1 above, monitored values remained consistently high until early 2009 when housekeeping changes were made. In 2011, three-month rolling averages began to increase slightly again with an exceedance of the 3-month average occurring in the January to March 2011 period. In 2011, Ohio EPA began working with Bunting staff to determine the cause of the exceedance of the standard.

Ohio EPA performed a site visit on August 9, 2011. Bunting has three baghouse locations (A, B and C) with a roadway in between. The monitor location is also along this roadway (Figure 3). During this visit, several housekeeping issues were discovered. Baghouse dust was visible on the exterior of the baghouse components, collection bags and on the ground around the collection bags. Improperly connected collection bags were also noted. Bunting also reported that earlier in the year a leak around the auger on baghouse B was identified. This was allowing dust that was collected in the baghouse to spill out on the ground instead of discharging into the collection bag. They were unsure of how long the leak occurred. And lastly, it is believed that Bunting's procedure for collection bag replacement and storage may also be a source of fugitive lead emission. Collection bags are removed and loaded on a forklift which transports the bag along the roadway crossing by the air monitor identified in Figure 3 and Figure 4 and into Plant #2 via the parking area on the east end for final storage. The bags are not contained and dust could be generated from those bags during this process. Appendix D contains a Bunting September 27, 2011 memo identifying potential issues that could have caused an exceedance and procedures to be implemented in the future.

Figure 4. Bunting Site Map.

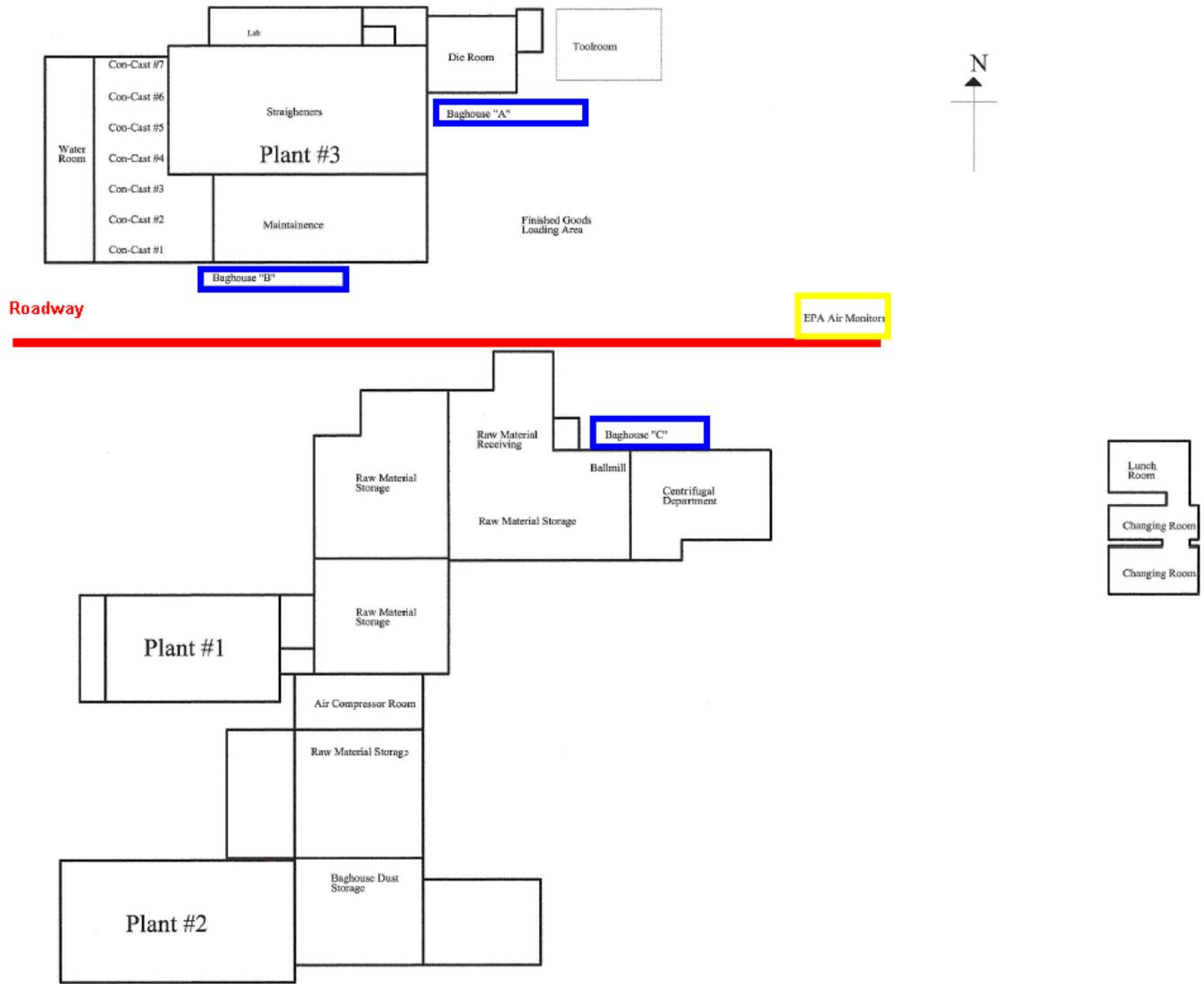
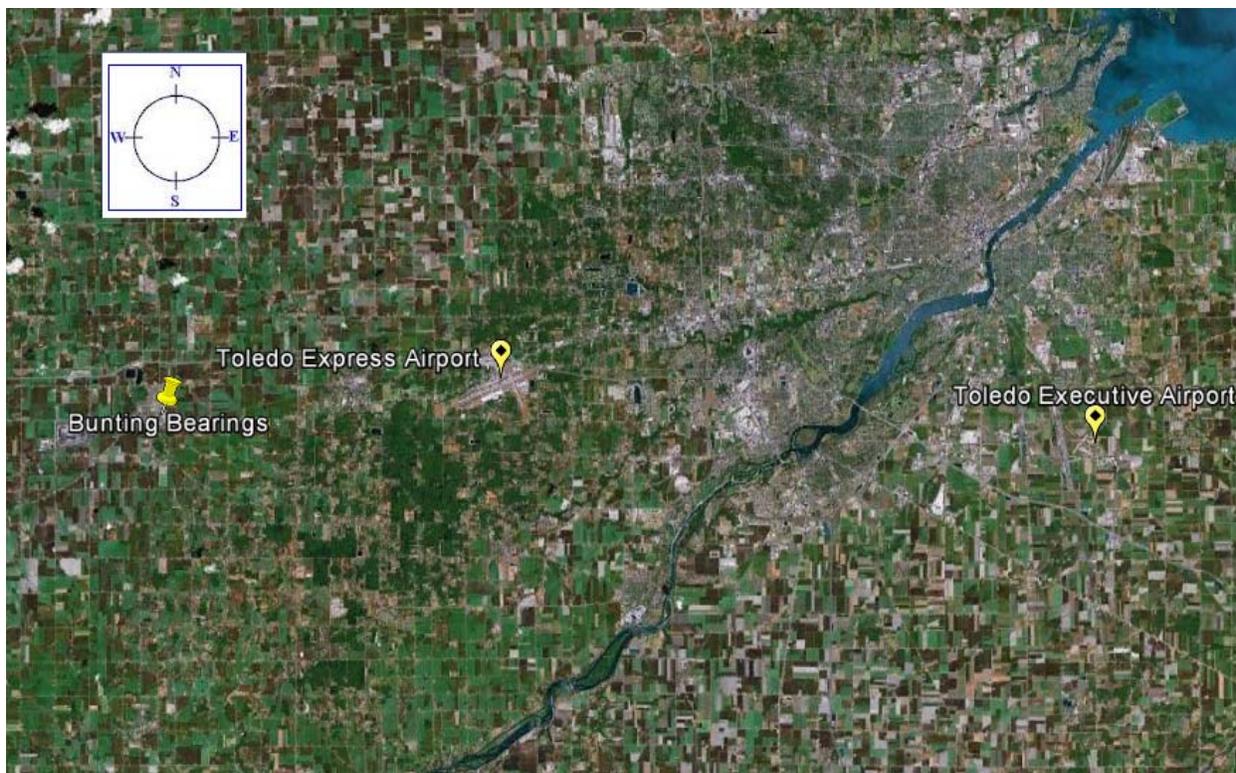


Figure 5. Bunting Arial Site Map.



As can be seen from Figure 3 and 4 above, a westerly, west-south-west or west-north-west wind would most likely lead to violations of the lead standard when maintenance or housekeeping issues occur at the baghouses. Two meteorological stations were used to analyze monitoring data trends: Toledo Express Airport located east of Bunting and Toledo Executive Airport located even further to the east (Figure 5).

Figure 6. Meteorological Station Locations.



Daily monitor values for 2011 were plotted against daily wind direction counts for both meteorological stations as depicted in Figures 6 and 7 below.

Figure 7. Toledo Express Airport Daily Wind Counts vs. the Standard.

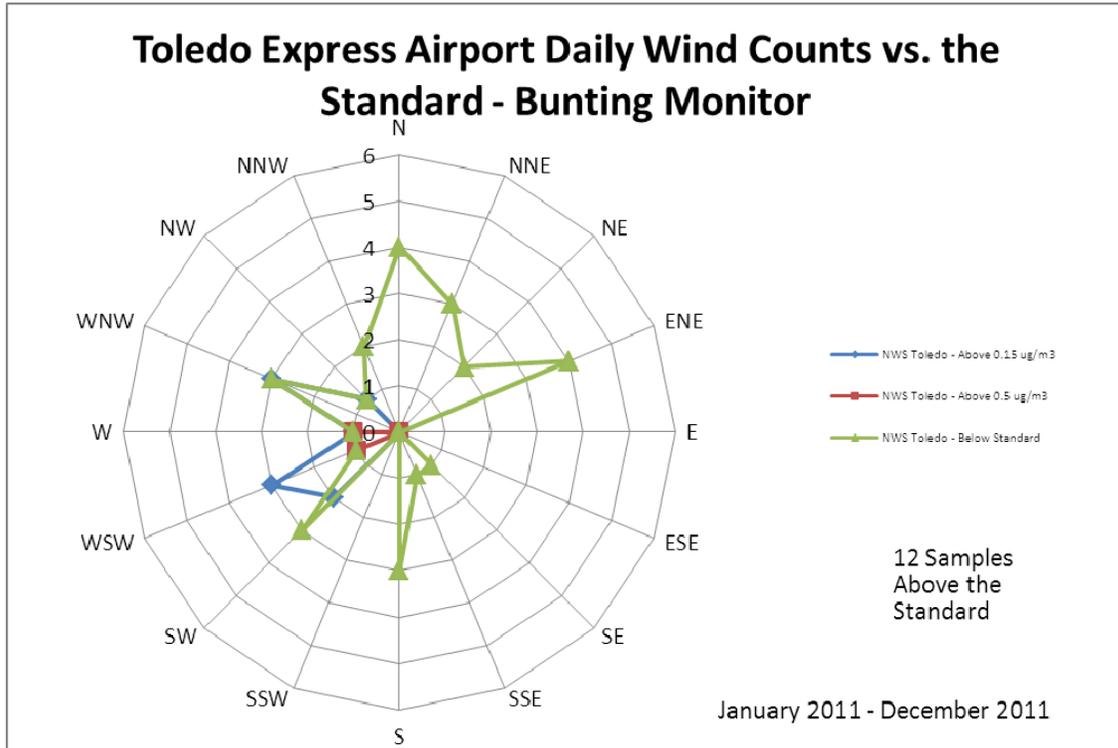
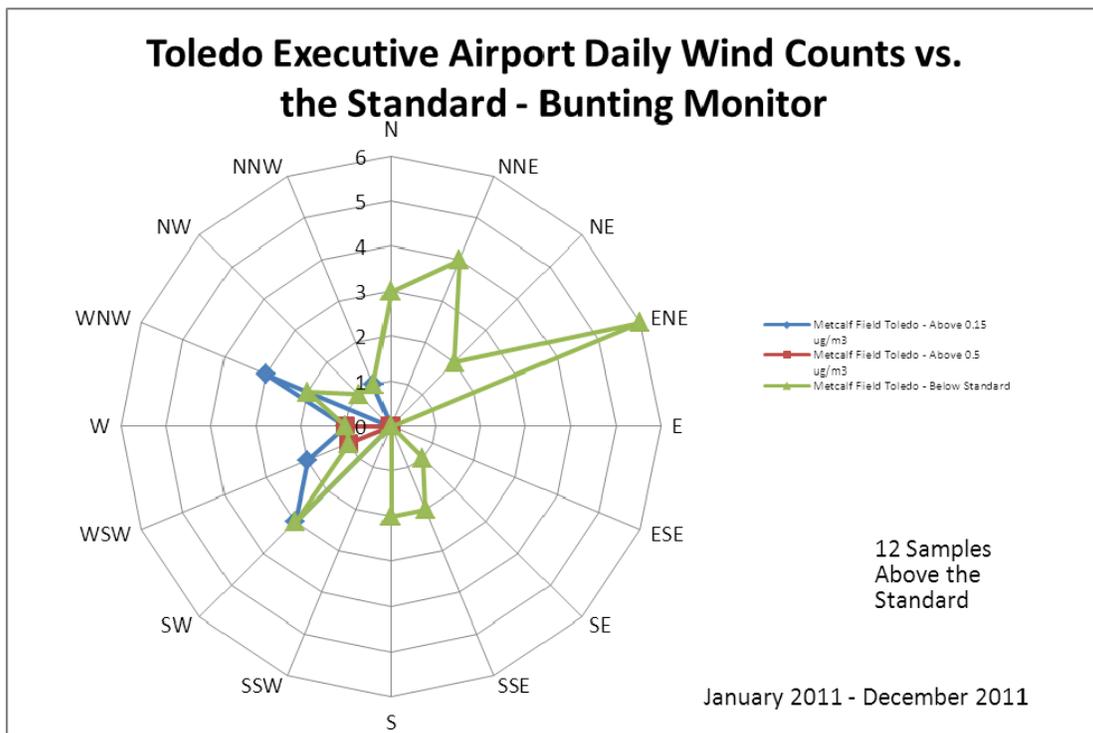


Figure 8. Toledo Executive Airport Daily Wind Counts vs. the Standard.



As depicted in Figures 6 and 7 above, higher monitored days are predominantly associated with winds coming out of the west, west-south-west or west-north-west where winds pass by the baghouse and roadway area before reaching the monitor. Note that only weekday monitoring was used as part of this analysis. Bunting operations, including baghouses, are shutdown on Friday evenings and baghouses are restarted at midnight on Sundays to allow startup of operations to resume on Mondays.

As can be seen from Table 3 below, for all days where the monitor recorded over 0.15 ug/m³ in 2011 (12), wind directions were predominantly from the westerly directions, weather conditions were predominantly clear or overcast, and production was occurring. In addition, in 50% of those days, collection bags on baghouses were changed within no more than 2 days of monitoring.

Table 3. Bunting 2011: Comparison of Daily Monitor Values over 0.15 ug/m³, Wind Direction, Weather Conditions, Baghouse Collection Bag Changes and Production.

Date (2011)	Total BH Dust Collected (pounds)	Monitor (ug/m ³)	Predominant Wind Direction	Predominant Weather Conditions	Production (pounds)
1/20	1160		W	SNOW	54251
1/21		0.539	W	OVERCAST	28918
1/27		0.324	SW	SNOW	37437
2/8		0.385	W	OVERCAST	41449
2/14		0.370	W	OVERCAST	30361
3/8	3266				7583
3/10		0.378	WNW	OVERCAST	32631
3/15	1188				33823
3/16		0.274	WSW	OVERCAST	28907
4/21		0.188	W	CLEAR	22708
6/7	1600				36023
6/8		0.161	SW	CLEAR	35322
7/26		0.300	WSW	CLEAR	32569
8/1	1346	0.268	W	CLEAR	21828
11/11		0.530	W	OVERCAST	29394
11/16	5734				19340
11/17		0.232	SW	CLEAR	29977

As can be seen in Appendix D, Bunting began clean up procedures and implementing improved bag change procedures in October 2011. Two daily exceedances occurred in November as Bunting was in the early stages of implementing the new procedures. However, since that time, January 2012 data¹¹ has also been below the standard

¹¹ Only January data is available at this time due to the time necessary to analyze filters. 2012 data is not quality assured at this time.

ranging from 0.0154 to 0.115 ug/m³. Additional discussion about Bunting's strategy to maintain compliance with the lead standard can be found in the Control Measures, Means or Techniques section below.

Modeling

Per U.S. EPA's Q&A Guidance, "modeling for attainment demonstrations is used to show that a nonattainment area will be in attainment by the attainment date. The modeling is used to show the effectiveness of control measures on the sources. For attainment modeling, maximum allowable or federally enforceable permit limits should be the basis of the model input emissions, as described in Section 8.1 and Table 8-1 of Appendix W and the Guideline for Air Quality Models."

Two dispersion modeling analyses were performed for this SIP analysis. One was an analysis relevant to the 2011 period, prior to implementing better maintenance and housekeeping procedures (base case). Ohio EPA's analysis demonstrates the level of lead emissions that had to have occurred during a representative period when the facility was not being maintained properly. The second analysis demonstrates when the equipment is functioning properly and maintained properly, Bunting's federally enforceable permit limits will provide for attainment of the standard (future case).

The base case analysis evaluated a reasonable estimate of maximum actual emissions to determine the contribution of fugitive emissions from poor maintenance and housekeeping at Bunting that contribute to the highest monitored concentrations. For this analysis, Ohio EPA selected the 3-month period of January to March 2011, when the highest three-month rolling average of 0.178 ug/m³ occurred. Bunting does not currently have acceptable federally enforceable permit limits to ensure compliance with the lead standard. As part of the base case analysis, Ohio EPA used stack test data for particulate emissions to determine a reasonable lead emissions rate to apply to each unit with potential lead emissions.

The future case analysis evaluated the existing controls, new federally enforceable permit limits that will be applied, and the absence of fugitive emissions resulting from poor housekeeping and maintenance. Bunting has developed a Preventative Maintenance Plan (Appendix E) intended to ensure the potential for fugitive emissions of lead around the baghouses will be minimized to de minimus levels, if not eliminated, in the future. Dispersion modeling was used to validate that the control strategies and permit limits will provide for attainment of the standard.

This dispersion modeling analysis was performed using the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) modeling system.

Appendix F contains the full modeling analyses and documentation.

Enforceable Emission Limitations

Bunting will be issued a federally enforceable permit-to-install and operate (FEPTIO) prior to November 2012. Table 4 identifies lead sources (emissions units), corresponding control devices and federal enforceable permit limits that will be incorporated into their FEPTIO for lead.

Control Measures, Means or Techniques

All lead processes at Bunting are currently controlled by three baghouses. Because of maintenance and housekeeping issues, Bunting has made several changes (as discussed above and in their September 27, 2011 memo). In addition, Bunting will be implementing a comprehensive Preventative Maintenance Plan (Appendix E) to ensure proper housekeeping and adequate operation of all baghouses. Bunting's FEPTIO will require a Preventative Maintenance Plan and that Ohio EPA is notified of any changes to such Preventative Maintenance Plan.

Ohio EPA has performed a RACM analysis (Appendix C) for Bunting and has determined that existing controls and practices, along with those practices being implemented by Bunting to address the 2011 exceedances as part of their Preventative Maintenance Plan, and the new FEPTIO emissions limits constitutes RACM.

Table 4. Bunting Sources of Lead, Control Devices, and Federally Enforceable Permit Limits.

Emission Unit	Description of Source Emissions	Control Device	Permit Limit (pound/hour)
P014 through P019, P028	Induction Furnaces #1-7	Baghouse B	1.50 particulate emissions, 0.150 lead combined limit
P020 through P025, P029	Tundish's #1-7	Baghouse A	1.50 particulate emissions, 0.150 lead combined limit
P005	Ball Crusher	Baghouse C	0.750 particulate emissions, 0.0750 lead combined limit
P006 and P007	Centrifugal Furnaces #1 and 2		
P008 through P011	Centrifugal Machines #1-4		
P013	Centrifugal Transport Ladle		

Schedules and Timetables for Compliance

In accordance with U.S. EPA's Q&A Guidance, Bunting will be issued a federally enforceable permit-to-install and operate (FEPTIO) with the above emissions limitations and requirement for the Preventative Maintenance Plan by November 1, 2012. U.S. EPA's Q&A Guidance states:

Control measures for the 2008 NAAQS need to be in place as expeditiously as practicable. In order for control measures to result in three years of monitored clean data by the attainment date, areas designated in the first round of designations (effective December 31, 2010, and requiring attainment demonstrations that show that the area will attain the standard as expeditiously as practicable, but no later than December 31, 2015) would need to have all necessary controls in place no later than November 1, 2012.....

Section Seven

Reasonable Further Progress

Section 172(c)(2) requires plan provisions require reasonable further progress (RFP). U.S. EPA's Q&A Guidance states:

Demonstrating reasonable further progress requires adherence to an ambitious compliance schedule. The schedule is expected to provide for periodic yields in significant emissions reductions or linear progress when appropriate. The U. S. Environmental Protection Agency (EPA) recommends that SIPs for Lead nonattainment areas provide a detailed schedule for compliance of reasonably available control measures (RACM), including reasonably available control technology (RACT), and accurately indicate the corresponding annual emission reductions to be achieved. Expeditious implementation of RACM and RACT by the sources in the nonattainment areas helps to ensure attainment of the standard by the attainment date.

As identified in above, Bunting's existing controls will be maintained, new emissions limits will be established, and implementation of the Preventative Maintenance Plan will be completed by no later than November 1, 2012. Bunting has been working with Ohio EPA to ensure an ambitious compliance schedule.

Section Eight

Contingency Measures

Section 172(c)(9) requires plan provisions provide for the implementation of specific measures to be undertaken if the area fails to make reasonable further progress, or to attain the national primary ambient air quality standard by the attainment date. Such measures shall be included in the plan revision as contingency measures to take effect in any such case without further action by the State or the Administrator. U.S. EPA's Q&A Guidance states:

EPA thinks a reasonable guide to the amount of emissions reduction that a single measure or group of measures should achieve for contingency purposes would be equal to the amount represented by annual average RFP in the attainment plan. For example, if the attainment plan provides for 1 tpy of Lead reductions over a 5-year attainment horizon, the recommended target for contingency measures would be at least 0.2 tpy.

Additional controls or reductions in lead emissions from Bunting's actual processes were not necessary in this area in order to attain the lead standard or show RFP. Rather, exceedances were associated with maintenance and housekeeping issues associated with the existing baghouses. However, Ohio will consider necessary contingency measures from a list of measures deemed appropriate and effective at the time the selection is made. The selection of measures will be based on cost-effectiveness, emission reduction potential, economic and social considerations or other factors that Ohio EPA deems appropriate

Ohio EPA will solicit input from all interested and affected persons in the maintenance area prior to selecting appropriate contingency measures. Because it is not possible at this time to determine what measures will be appropriate at an unspecified time in the future, the list of contingency measures outlined below is not comprehensive. Some of the contingency measures that were evaluated and would be considered are as follows:

- Additional lead reduction control devices the emissions units identified in Table 4 above
- Improvements to the Preventative Maintenance Plan
- Additional upgrades to existing control devices
- Limitations on hours of operation

No contingency measure will be implemented without providing the opportunity for public participation during which the relative costs and benefits of individual measures, at the time they are under consideration, can be evaluated.

Section Nine

Public Participation

Ohio published notification for a public hearing and solicitation for public comment concerning the draft SIP in a widely distributed county publication on May 15, 2012.

The public hearing to receive comments on the SIP was held on June 14, 2012, at the Wauseon Public Library, 117 E. Elm St., Wauseon, OH 43567. The public comment period closed on June 14, 2012. Appendix G includes a copy of the public notice, transcript from the public hearing, and the response to comments.