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

6/19/2013

Certified Mail

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

Jeff Mount
Kenton Iron Products Vision Drive Facility
347 Vine Street
Kenton, OH 43326

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

Facility ID: 0333010042
Permit Number: P0114423
Permit Type: Initial Installation
County: Hardin

Dear Permit Holder:

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

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

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Michael W. Ahern

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

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

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description:

   This permit serves to allow for the installation of a new VMX1 mixer (emissions unit F009) at Kenton Iron Products in Kenton, Ohio. The new mixer will replace emissions unit F008 during the July shutdown and will operate in conjunction with the existing carousel and rollover equipment. Potential emissions from the new mixer equate to 46.52 tons of VOC/year and 10.25 tons of PM10/year. Kenton Iron Products has requested federally enforceable limitations on the potential to emit VOC and PM10 from this mixer to avoid Title V permitting requirements.

3. Facility Emissions and Attainment Status:

   Kenton Iron Products is a non-Title V facility located in Hardin County. Hardin County is considered attainment for all criteria pollutants.

4. Source Emissions:

   The potential to emit of the new mixer will result in 46.52 tons of VOC/year and 10.25 tons of PM10/year. Restricting the annual sand throughput to 40,000 tons per year for this emissions unit will limit emissions to 23.60 tons of VOC/rolling 12-month period and 5.20 tons of PM10/rolling 12-month period.

5. Conclusion:

   Restricting the annual sand throughput for emissions unit F009 will effectively limit the VOC and PM10 emissions, thus allowing Kenton Iron Products to avoid Title V permitting requirements.

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
VOC	23.60
PM10	5.20

PUBLIC NOTICE
6/19/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

Kenton Iron Products Vision Drive Facility
13917 Vision Drive,
Kenton, OH 43326
Hardin County
FACILITY DESC.: Iron Foundries
PERMIT #: P0114423
PERMIT TYPE: Initial Installation
PERMIT DESC: Installation of a new VMX1 mixer with existing carousel and rollover equipment

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Kenton Iron Products Vision Drive Facility

Facility ID:	0333010042
Permit Number:	P0114423
Permit Type:	Initial Installation
Issued:	6/19/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install and Operate
for
Kenton Iron Products Vision Drive Facility

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Authorization

Facility ID:	0333010042
Application Number(s):	A0047745
Permit Number:	P0114423
Permit Description:	Installation of a new VMX1 mixer with existing carousel and rollover equipment
Permit Type:	Initial Installation
Permit Fee:	$1,000.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	6/19/2013
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

Kenton Iron Products Vision Drive Facility
13917 Vision Drive
Kenton, OH 43326

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

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0114423
Permit Description: Installation of a new VMX1 mixer with existing carousel and rollover equipment

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

Emissions Unit ID:	**F009**
Company Equipment ID:	Mold Making
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None

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

      (1) None

C. Emissions Unit Terms and Conditions

1. F009, Mold Making

Operations, Property and/or Equipment Description:

Mixer VMX1 with Existing Carousel and Rollover Equipment

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

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

a. None

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

a. b)(1)a., b)(2)a., c)(1), d)(1), d)(2), e)(1), f)(1)a., f)(1)b., and f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	23.60 tons of volatile organic compounds (VOC)/rolling, 12-month period 5.20 tons of fugitive particulate matter 10 microns in size or less (PM10)/rolling, 12-month period Visible fugitive particulate emissions (PE) shall not exceed 20% opacity, as a three-minute average from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit See b)(2)a. and c)(1)
b.	ORC rule 3704.03(T)	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c
d.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-07(B)	See b)(2)e.
f.	OAC rule 3745-17-08(B)	See b)(2)f.

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable limitations for purposes of avoiding Title V permitting requirements. The federally enforceable limitations are based on operational restrictions in c)(1):

i. 23.60 tons of VOC/rolling, 12-month period;

ii. 5.20 tons of fugitive PM10/rolling, 12-month period; and

iii. Visible fugitive PE shall not exceed 20% opacity, as a three-minute average from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.

b. In accordance with ORC rule 3704.03(T), Best Available Technology (BAT) for VOC emissions from this emissions unit has been determined to be compliance with OAC rule 3745-31-05(D).

c. The permittee has satisfied the BAT requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective 11/30/01, in this permit for PM10. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D), therefore, the permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective 11/30/01, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (SB 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than 10 tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, these emission limitations/control measures no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by the U.S. EPA.

d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

BAT requirements under OAC rule 3745-31-05(A)(3), as effective December 1, 2006, do not apply to the PM10 emissions since the potential to emit is less than

10 tons per year, taking into consideration the federally enforceable requirements under OAC rule 3745-31-05(D).

e. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

f. This facility is not located within an "Appendix A" area as defined in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

(1) The maximum annual sand usage shall not exceed 40,000 tons per year based on a rolling, 12-month summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

Month(s)	Maximum Allowable Sand Usage (Tons)
1	8,000
1-2	10,900
1-3	13,800
1-4	16,700
1-5	19,600
1-6	22,500
1-7	25,400
1-8	28,300
1-9	31,200
1-10	34,100
1-11	37,000
1-12	40,000

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

a. The amount of sand used each month, in tons;

b. During the first 12 calendar months of operation, or the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of sand used, in tons; and

c. Beginning the first month after the first 12 calendar months of operation, or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of sand used, in tons.

(2) The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed the permittee shall also note the following in the operations log:

a. The location and color of the emissions;

b. Whether the emissions are representative of normal operations;

c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. The total duration of any visible emissions incident; and

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

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under d)(2)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

(1) The permittee shall submit deviation reports that identify:

a. All deviations of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:

i. During the first 12 months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative sand usage rates in c)(1);

ii. After the first 12 months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum annual sand usage restriction specified in c)(1);

iii. 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

iv. Any corrective actions taken to eliminate the visible fugitive particulate emissions.

b. The probable cause of each deviation;

c. Any corrective actions that were taken to remedy the deviations or prevent future deviations; and

d. The magnitude and duration of each deviation.

If no deviations occurred during a calendar quarter, the permittee shall submit a report that states that no deviations occurred during the quarter.

The quarterly reports shall be submitted electronically through Ohio EPA Air Services each year by January 31, April 30, July 31, and October 31 and shall cover the previous calendar quarter.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>
23.60 tons of VOC/rolling, 12-month period

<u>Applicable Compliance Method</u>
The rolling, 12-month VOC limitation was developed by multiplying the maximum annual sand usage of 40,000 tons by an emission factor of 1.18 lbs of VOC*/ton of sand, then dividing by 2000 lbs.

Compliance with the rolling, 12-month VOC limitation shall be demonstrated through record keeping requirements specified in section d)(1). Therefore,

provided compliance is shown with the annual restriction by means of the monitoring and record keeping requirement in d)(1), compliance with the annual emission limitation shall also be demonstrated.

* The VOC emission factor was provided by the resin supplier, Ask Chemical (x1000/x2000/53-308)

b. Emission Limitation:
5.20 tons of PM10/rolling, 12-month period

Applicable Compliance Method
The rolling, 12-month PM10 limitation was developed by multiplying the maximum annual sand usage of 40,000 tons by an emission factor of 0.26 lb of PM10*/ton of sand, then dividing by 2000 lbs.

Compliance with the rolling 12-month PM10 limitation shall be demonstrated through record keeping requirements specified in section d)(1). Therefore, provided compliance is shown with the annual restriction by means of the monitoring and record keeping requirement in d)(1), compliance with the annual emission limitation shall also be demonstrated.

* The PM10 emission factor was provided via U.S. EPA's PM Calculator, SCC 30400350

c. Emission Limitation:
Visible fugitive PE shall not exceed 20% opacity, as a three-minute average from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit

Applicable Compliance Method
If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

(1) None