



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

9/16/2013

Certified Mail

John Burke
OSCO Inc.-Jackson Division
Jct. Rt. 23 South & Rt. 52 East / West
P.O. Box 1388
Portsmouth, OH 45662-1388

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0640010009
Permit Number: P0114226
Permit Type: Initial Installation
County: Jackson

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install 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 Times Journal. 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
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138

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 in writing 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, Southeast District Office at (740)385-8501.

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-SEDO; Kentucky; West Virginia

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
OSCO Inc.-Jackson Division

Issue Date: 9/16/2013
Permit Number: P0114226
Permit Type: Initial Installation
Permit Description: 13 TPH (34 cf) Wheelabrator Shot Blaster #4 vented to the finishing Baghouse
Facility ID: 0640010009
Facility Location: OSCO Inc.-Jackson Division
Athens & Chillicothe, P.O. Box 327
Jackson, OH 45640-0327
Facility Description: Iron Foundries

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/permitonline.aspx> by entering the permit # or: Steve Alspach, Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138. Ph: (740)385-8501



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

This permit is for a new 34 cubic foot Wheelabrator #4 (shot blaster), EU F014, with a maximum operating rate of 13 TPH vented to a baghouse achieving 0.020 gr/dscf. OSCO operates two existing Wheelabrators, EUs F004 (Wheelabrator #2) and F005 (Wheelabrator #3) as well as stand grinders (EU F009), that also vent to the same baghouse as the new EU.

3. Facility Emissions and Attainment Status:

OSCO Inc. operates a gray iron foundry located in the City of Jackson, Jackson County, which is in attainment for all criteria pollutants. OSCO's Jackson Division is a major stationary source and a major Title V facility, and is classified as an area source of HAPs subject to 40 CFR Part 63, Subpart ZZZZZ, as a "large foundry." OSCO has synthetic minor PTIs with operating restrictions in place for several emission units to ensure that the additions of equipment over time have not exceeded the significance levels to be considered major modifications.

4. Source Emissions:

The uncontrolled particulate emission (PE) factor for the new wheelabrator is 15.50 lbs/ton, and the uncontrolled PM₁₀ and PM_{2.5} emissions factor is 1.7 lbs/ton. Using these factors, an operating rate of 13 TPH and 8,760 hrs/yr of operation, the uncontrolled PE PTE is 882.57 TPY, and the uncontrolled PM₁₀ and PM_{2.5} emissions are 96.80 TPY. To ensure that the installation of the new wheelabrator is not considered a major modification requiring PSD review, OSCO Industries, Inc. has requested that the requirement to install and operate a baghouse control with a maximum outlet concentration not to exceed 0.02 grains per dry standard cubic foot be made a federally enforceable requirement of the installation permit for EU F014.

Even though not required to avoid PSD review, OSCO has also requested voluntary restrictions on the maximum annual operating hours and metal throughput to be consistent with the synthetic minor restrictions applicable to EU P903, the cupola melting furnace. Therefore, this PTI will restrict EU F014 to operating no more than 4,680 hours or 60,840 tons of metal melted (13 tph x 4,680 hrs/yr) based on rolling 12-month summations.

Based on the control requirements and operational restrictions in the PTI, the potential for PE is 4.68 TPY PE (stack) and 0.71 TPY PE (fugitive) for a total of 5.39 TPY PE.

5. Conclusion:

The terms and conditions and operating restrictions contained in this permit for F014, if met, are sufficient to ensure that OSCO – Jackson facility will avoid triggering the major modification definition



for the installation of the new wheelabrator (EU F014).

6. Please provide additional notes or comments as necessary:

None.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE (F014 stack)	4.68
PM ₁₀ /PM _{2.5} (F014 stack)	0.51
PE (F014 total)	5.39
PM ₁₀ /PM _{2.5} (F014 total)	0.59
PE/PM ₁₀ /PM _{2.5} (F004, F005, F008, and F014 combined and restricted)	10.83



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
OSCO Inc.-Jackson Division**

Facility ID:	0640010009
Permit Number:	P0114226
Permit Type:	Initial Installation
Issued:	9/16/2013
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
OSCO Inc.-Jackson Division

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. Federally Enforceable Standard Terms and Conditions	4
2. Severability Clause	4
3. General Requirements	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting	6
6. Compliance Requirements	6
7. Best Available Technology	7
8. Air Pollution Nuisance	7
9. Reporting Requirements	7
10. Applicability	8
11. Construction of New Sources(s) and Authorization to Install	8
12. Permit-To-Operate Application	9
13. Construction Compliance Certification	9
14. Public Disclosure	9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	10
16. Fees.....	10
17. Permit Transfers	10
18. Risk Management Plans	10
19. Title IV Provisions	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions	13
1. F014, Wheelabrator #4	14



Draft Permit-to-Install
OSCO Inc.-Jackson Division
Permit Number: P0114226
Facility ID: 0640010009

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0640010009
Facility Description: Gray Iron Foundry.
Application Number(s): A0045018
Permit Number: P0114226
Permit Description: 13 TPH (34 cf) Wheelabrator Shot Blaster #4 vented to the finishing Baghouse
Permit Type: Initial Installation
Permit Fee: \$1,000.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 9/16/2013
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

OSCO Inc.-Jackson Division
Athens & Chillicothe
P.O. Box 327
Jackson, OH 45640-0327

of a Permit-to-Install 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, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

The above named entity is hereby granted a Permit-to-Install for the 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 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

Scott J. Nally
Director



Draft Permit-to-Install
OSCO Inc.-Jackson Division
Permit Number: P0114226
Facility ID: 0640010009

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0114226

Permit Description: 13 TPH (34 cf) Wheelabrator Shot Blaster #4 vented to the finishing Baghouse

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

Emissions Unit ID:	F014
Company Equipment ID:	Wheelabrator #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
OSCO Inc.-Jackson Division
Permit Number: P0114226
Facility ID: 0640010009
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of 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. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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.

4. Monitoring and Related Record Keeping 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:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) 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:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.



- (2) 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 Ohio EPA DAPC, Southeast District Office. 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 A.15. below if no deviations occurred during the quarter.
 - (3) 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 Ohio EPA DAPC, Southeast District Office 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.
 - (4) This permit is for an emissions unit located at a Title V facility. 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.

5. 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 Ohio EPA DAPC, Southeast District Office 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).

6. Compliance Requirements

- a) 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.
- b) 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.



- c) 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:
 - (1) 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.
 - (2) 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.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office 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:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. 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 Ohio EPA DAPC, Southeast District Office.
- 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 Ohio EPA DAPC, Southeast District Office. 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.)

10. 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).

11. Construction of New Sources(s) and Authorization to Install

- a) 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.
- b) If applicable, authorization to install any new 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 has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.



15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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.

16. 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.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. 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.

19. 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.



Draft Permit-to-Install
OSCO Inc.-Jackson Division
Permit Number: P0114226
Facility ID: 0640010009
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install
OSCO Inc.-Jackson Division
Permit Number: P0114226
Facility ID: 0640010009

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None
2. The Ohio EPA has determined that this facility may be subject to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



Draft Permit-to-Install
OSCO Inc.-Jackson Division
Permit Number: P0114226
Facility ID: 0640010009
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. F014, Wheelabrator #4

Operations, Property and/or Equipment Description:

13 TPH (34 cf) Wheelabrator #4 Shot Blaster vented to a baghouse rated at 99.5% capture and 99% control efficiency

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) , as effective 11/30/01	<p>Particulate emissions (PE) and emissions of particulate matter less than 10 microns (PM₁₀) and particulate matter less than 2.5 microns (PM_{2.5}) from any stack serving emissions units (EUs) F004, F005, F009 and F014 shall not exceed 0.020 grain per dry standard cubic foot of exhaust gases.</p> <p>No visible PE from the baghouse stack and no visible emissions of fugitive dust.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>See b)(2)a. and c.-d. below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and (B), 3745-17-08(B), 3745-17-11(B) and 3745-31-05(D).</p>
b.	OAC rule 3745-31-05(C), as effective 12/01/06	See b)(2)b below.
c.	OAC rule 3745-17-07(A)	<p>Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average.</p> <p>This emissions limitation is less stringent</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		than the limitation listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.
d.	OAC rule 3745-17-07(B)(1)	<p>Visible PE of fugitive dust shall not exceed 20% opacity, as a 3-minute average.</p> <p>This emissions limitation is less stringent than the limitation listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.</p>
e.	OAC rule 3745-17-08	<p>The permittee shall utilize reasonably available control measures to minimize or eliminate visible particulate emissions of fugitive dust.</p> <p>See b)(2)c.-d. below.</p>
f.	OAC rule 3745-17-11(B)	<p>PE from any stack serving this emissions unit shall not exceed 22.90 pounds per hour.</p> <p>This emissions limitation is less stringent than the limitations listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.</p>
g.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid NSR major modification thresholds)	<p>PE from any stack serving EU F014 shall not exceed 4.68 tons per year, as a rolling, 12-month summation.</p> <p>Fugitive PE from EU F014 shall not exceed 0.71 tons, as a rolling, 12-month summation.</p> <p>Emissions of PM₁₀ and PM_{2.5} from any stack serving EU F014 shall not exceed 0.51 tons, as a rolling, 12-month summation.</p> <p>Fugitive emissions of PM₁₀ and PM_{2.5} shall not exceed 0.08 tons, as a rolling, 12-month summation.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See c)(1) below.
h.	OAC rule 3745-31-05(F) (Voluntary restriction to match restrictions in the permits for related EUs)	PE and emissions of PM ₁₀ and PM _{2.5} from any stack serving EUs F004, F005, F009 and F014, combined, shall not exceed 10.83 tons per year as a rolling, 12-month summation. See c)(2) below.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, 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 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten 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 revision 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, then these emission limits/control measures no longer apply.
- b. 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.

The permit for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. Emission units F004, F005, F009 and F014 shall be vented to the finishing baghouse rated at 99.5% capture and 99% control efficiency and shall not exceed 0.020 grain per dry standard cubic foot of exhaust gases, when the emissions unit is in operation;
- ii. PE and emission of PM₁₀ and PM_{2.5} from any stack serving EUs F004, F005, F009 and F014, combined, shall not exceed 10.83 tons per year;
- iii. PE from any stack serving EU F014 shall not exceed 4.68 tons, as a rolling, 12-month summation; and
- iv. Fugitive PE from EU F014 shall not exceed 0.71 tons, as a rolling, 12-month summation;



Effective Date: To be entered upon final issuance

- v. Emissions of PM₁₀ and PM_{2.5} from any stack serving EU F014 shall not exceed 0.51 tons, as a rolling, 12-month summation; and
- vi. Fugitive emissions of PM₁₀ and PM_{2.5} shall not exceed 0.08 tons, as a rolling, 12-month summation.
- c. The permittee shall employ best/reasonably available control measures for the above-identified shot blasting operation for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee will maintain the building enclosures of the above-mentioned shot blasting operations, and will ensure that the cartridge filter baghouse captures 99.5% of the emissions from the shot blasting operations. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. For each shot blasting operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the weekly VE checks conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measure(s) is unnecessary.

c) Operational Restrictions

- (1) This emission unit shall be vented to the finishing baghouse rated at 99.5% capture and 99% control efficiency and shall not exceed 0.020 grain per dry standard cubic foot of exhaust gases, when the emissions unit is in operation.
- (2) The permittee has requested a voluntary restriction on the tons of metal processed and annual operating hours for purposes of limiting potential to emit consistent with the federally enforceable restrictions applicable to similar sources. Therefore, the maximum number of operating hours for emissions unit F014 shall not exceed 4,680 hours as a rolling, 12-month summation and 60,840 tons of molten metal as a rolling, 12-month summation. To ensure compliance during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours specified in the following table:

<u>Month(s)</u>	<u>Maximum Cumulative Operating Hours</u>	<u>Tons Molten Metal</u>
1	800	6,000
1-2	1,600	12,000
1-3	2,400	18,000
1-4	3,200	25,000



<u>Month(s)</u>	<u>Maximum Cumulative Operating Hours</u>	<u>Tons Molten Metal</u>
1-5	4,000	45,000
1-6	4,680	60,840
1-7	4,680	60,840
1-8	4,680	60,840
1-9	4,680	60,840
1-10	4,680	60,840
1-11	4680	60840
1-12	4680	60840

After the first 12 calendar months of operation following the startup of emissions unit F014, compliance with the annual operating hour limitation and metal throughput limitation shall be based upon a rolling, 12-month summation of the operating hours and the molten metal produced.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall perform weekly 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 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 emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- (3) The permittee shall properly install, calibrate (if applicable), operate, and maintain equipment to monitor the hours of operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- (4) The permittee shall maintain records which list the following information:
 - a. the condition and operating status of each time meter for the month;
 - b. the total monthly hours of operation;
 - c. the total monthly tons of material processed;
 - d. the rolling, 12-month summation of the hours of operation, and
 - e. the rolling, 12-month summation of the tons of material processed

e) Reporting Requirements

- (1) The permittee shall submit written reports that identify:
 - a. all weeks 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. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (2) The permittee shall submit written reports that identify:
 - a. all weeks during which any visible particulate emissions were observed from the stack serving this emissions unit, and



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

These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (3) The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 12-month limitation on the hours of operation for this emissions unit; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation, and;
 - b. the rolling, 12-month limitation on particulate emissions during the previous 6 calendar months.
- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the emissions limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

PE and emissions of PM₁₀ and PM_{2.5} from any stack serving EUs F004, F005, F009 and F014 shall not exceed 0.020 grain per dry standard cubic foot of exhaust gases.

PE from any stack serving this emissions unit shall not exceed 22.90 pounds per hour.

Applicable Compliance Method:

Compliance with the grain loading limit shall be determined according to testing requirements specified in f)(2) below.

- b. Emissions Limitation:

No visible PE from the baghouse stack and no visible emissions of fugitive dust.

Applicable Compliance Method:

If required, visible PE from the stack shall be determined according to USEPA Method 22.



c. Emissions Limitation:

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

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

d. Emissions Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

e. Emissions Limitation:

PE from any stack serving EU F014 shall not exceed 4.68 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the uncontrolled hourly emission factor by the hourly metal production rate then multiplying by the stack capture and control efficiencies and then multiplying by the rolling, 12-month total hours of operation of the emissions unit, and then dividing by 2,000 lbs/ton.

The annual emission limitation was established by the following calculation:
 $15.50 \text{ lbs/ton} * 13 \text{ tons/hr} = 201.5 \text{ lbs/hr uncontrolled.}$

$201.5 \text{ lbs/hr uncontrolled} * (99.5 \% \text{ capture efficiency}) * (1 - 0.99 \text{ control efficiency})$
 $= 2.00 \text{ lbs/hr}$

$2.00 \text{ lbs/hr} * 4,680 \text{ hrs/yr} = 9,360 \text{ lbs/yr} / 2,000 \text{ lbs/ton} = 4.68 \text{ TPY}$

f. Emissions Limitation:

Fugitive PE from EU F014 shall not exceed 0.71 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the uncontrolled hourly emission factor from the permittee's application by the hourly metal production rate then multiplying by the fugitive capture and control efficiencies and then multiplying by the rolling, 12-month total hours of operation of the emissions unit, and then dividing by 2,000 lbs/ton.



The annual emission limitation was established by the following calculation:
 $15.50 \text{ lbs/ton} * 13 \text{ tons/hr} = 201.5 \text{ lbs/hr uncontrolled.}$

$201.5 \text{ lbs/hr uncontrolled} * (1 - 99.5\% \text{ capture efficiency}) * (1 - 0.70 \text{ encl. control efficiency}) = 0.30 \text{ lbs/hr}$

$0.30 \text{ lbs/hr} * 4,680 \text{ hrs/yr} = 1,404 \text{ lbs/yr} / 2,000 \text{ lbs/ton} = 0.71 \text{ TPY}$

g. Emissions Limitation:

Emissions of PM₁₀ and PM_{2.5} from any stack serving EU F014 shall not exceed 0.51 tons, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the uncontrolled hourly emission factor by the hourly metal production rate then multiplying by the stack capture and control efficiencies and then multiplying by the rolling, 12-month total hours of operation of the emissions unit, and then dividing by 2,000 lbs/ton.

The annual emission limitation was established by the following calculation:

$1.7 \text{ lbs/ton} * 13 \text{ tons/hr} = 22.1 \text{ lbs/hr uncontrolled.}$

$22.1 \text{ lbs/hr uncontrolled} * (99.5\% \text{ capture efficiency}) * (1 - 0.99 \text{ control efficiency}) = 0.22 \text{ lbs/hr}$

$0.22 \text{ lbs/hr} * 4,680 \text{ hrs/yr} = 1,029.6 \text{ lbs/yr} / 2,000 \text{ lbs/ton} = 0.51 \text{ TPY}$

h. Emissions Limitation:

Fugitive emissions of PM₁₀ and PM_{2.5} shall not exceed 0.08 tons, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the uncontrolled hourly emission factor from the permittee's application by the hourly metal production rate then multiplying by the fugitive capture and control efficiencies and then multiplying by the rolling, 12-month total hours of operation of the emissions unit, and then dividing by 2,000 lbs/ton.

The annual emission limitation was established by the following calculation:

$1.7 \text{ lbs/ton} * 13 \text{ tons/hr} = 22.1 \text{ lbs/hr uncontrolled.}$

$22.1 \text{ lbs/hr uncontrolled} * (1 - 99.5\% \text{ capture efficiency}) * (1 - 0.70 \text{ encl. control efficiency}) = 0.03 \text{ lbs/hr}$

$0.03 \text{ lbs/hr} * 4,680 \text{ hrs/yr} = 1,404 \text{ lbs/yr} / 2,000 \text{ lbs/ton} = 0.08 \text{ TPY}$



i. Emissions Limitation:

PE and emissions of fugitive PM₁₀ and PM_{2.5} from any stack serving EUs F004, F005, F009 and F014, combined, shall not exceed 10.83 tons per year rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the most recent stack test hourly emission rate by the rolling, 12-month total hours of operation of the emissions unit, and then dividing by 2,000 lbs/ton.

The annual emission limitation was established by the following calculation:

$$0.020 \text{ gr/dscf} * 27,000 \text{ cfm} * 60 \text{ min/hr} * (1 \text{ lb}/7,000 \text{ gr}) = 4.63 \text{ lbs/hr}$$

$$4.63 \text{ lbs/hr} * 4,680 \text{ hrs/yr} = 21,668 \text{ lbs/yr} / 2,000 \text{ lbs/ton} = 10.83 \text{ TPY}$$

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the modified emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the grain loading emissions limitation for PE.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

For PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and
For PM₁₀, Methods 1-4 of 40 CFR Part 60, Appendix A and 201 or 201 A of 40 CFR Part 51, Appendix M.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office



or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

- (1) None