



5/5/2014

Certified Mail

RYAN BURKE
OSCO INDUSTRIES, INC. NEW BOSTON DIVISI
202 VINE ST
PORTSMOUTH, OH 45662

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

Facility ID: 0773010180
Permit Number: P0116521
Permit Type: Initial Installation
County: Scioto

No	TOXIC REVIEW
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	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

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 Portsmouth 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 50 West Town Street Suite 700 PO Box 1049 Columbus, Ohio 43216-1049	and	Portsmouth City Health Dept., Air Pollution Unit 605 Washington Street 3rd Floor Portsmouth, OH 45662
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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 Portsmouth City Health Dept., Air Pollution Unit at (740)353-5156.

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
Portsmouth; Kentucky; West Virginia

PUBLIC NOTICE

5/5/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

OSCO INDUSTRIES, INC. NEW BOSTON DIVISI

202 VINE ST,
NEW BOSTON, OH 45662

Scioto County

FACILITY DESC.: Iron Foundries

PERMIT #: P0116521

PERMIT TYPE: Initial Installation

PERMIT DESC: Initial installation permit for South Cooling Drum: continuous rotary cooling drum controlled with the Wheelabrator Cartridge Collector (WCC) and the East Foundry Dust Collector (EFDC) baghouses (replacing the existing south cooling drum formerly permitted as emissions unit P908).

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: Cindy Charles, Portsmouth City Health Dept., Air Pollution Unit, 605 Washington Street 3rd Floor, Portsmouth, OH 45662. Ph: (740)353-5156



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Osco Industries, Portsmouth is proposing to replace the South Cooling Drum (formerly permitted as EU P908).

3. Facility Emissions and Attainment Status:

Osco Industries, New Boston has a potential to emit of greater than 100 tons per year of Particulate Matter and Carbon Monoxide and greater than 10 tons per year of any single HAP and 25 tons per year combined HAPs. They are located in Scioto County which is designated as attainment for all criteria pollutants.

4. Source Emissions:

Osco Industries, New Boston established federally enforceable emission limitations for both individual and combined HAP emissions of combined HAP emissions less than or equal to 24.9 tons per year and individual HAP emissions less than or equal to 9.9 tons per year and of less than 100 tons per year each of Particulate Matter and Carbon Monoxide in FESOP permit P0091377, issued final 4/18/07. The existing facility potential to emit will remain below the applicable HAP and PM thresholds with replacement of the south cooling drum. The south cooling drum vents to the WCC and EFDC which have 12-month rolling PE emissions of 13.03 and 19.78, respectively. The fugitive PE emissions from the south cooling drum are 1.64 tons per year.

5. Conclusion:

Osco Industries, New Boston is currently classified as a synthetic minor/FESOP facility. Through federally enforceable terms and conditions, production limitations and record keeping requirements, Osco will not trigger MACT or Title V requirements with replacement of the south cooling drum.

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>
Stack PE	32.81
Fugitive PE	1.64



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
OSCO INDUSTRIES, INC. NEW BOSTON DIVISI**

Facility ID:	0773010180
Permit Number:	P0116521
Permit Type:	Initial Installation
Issued:	5/5/2014
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
OSCO INDUSTRIES, INC. NEW BOSTON DIVISI

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Draft Permit-to-Install and Operate
OSCO INDUSTRIES, INC. NEW BOSTON DIVISI
Permit Number: P0116521
Facility ID: 0773010180
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0773010180
Application Number(s): A0050173
Permit Number: P0116521
Permit Description: Initial installation permit for South Cooling Drum: continuous rotary cooling drum controlled with the Wheelabrator Cartridge Collector (WCC) and the East Foundry Dust Collector (EFDC) baghouses (replacing the existing south cooling drum formerly permitted as emissions unit P908).
Permit Type: Initial Installation
Permit Fee: \$1,250.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 5/5/2014
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:

OSCO INDUSTRIES, INC. NEW BOSTON DIVISI
202 VINE ST
NEW BOSTON, OH 45662

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:

Portsmouth City Health Dept., Air Pollution Unit
605 Washington Street
3rd Floor
Portsmouth, OH 45662
(740)353-5156

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

Craig W. Butler
Director



Draft Permit-to-Install and Operate
OSCO INDUSTRIES, INC. NEW BOSTON DIVISI
Permit Number: P0116521
Facility ID: 0773010180
Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0116521
Permit Description: Initial installation permit for South Cooling Drum: continuous rotary cooling drum controlled with the Wheelabrator Cartridge Collector (WCC) and the East Foundry Dust Collector (EFDC) baghouses (replacing the existing south cooling drum formerly permitted as emissions unit P908).

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

Emissions Unit ID:	P919
Company Equipment ID:	South Rotary Cooling Drum
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
OSCO INDUSTRIES, INC. NEW BOSTON DIVISI
Permit Number: P0116521
Facility ID: 0773010180
Effective Date: To be entered upon final issuance

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. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. 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 of this permit 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 Portsmouth City Health Dept., Air Pollution Unit 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 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 emission 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.



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.



Draft Permit-to-Install and Operate
OSCO INDUSTRIES, INC. NEW BOSTON DIVISI
Permit Number: P0116521
Facility ID: 0773010180
Effective Date: To be entered upon final issuance

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.
2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63, Subpart ZZZZZ, National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources. Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, 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 this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website:
<http://www.epa.gov/ttn/atw/area/arearules.html>.



Draft Permit-to-Install and Operate
OSCO INDUSTRIES, INC. NEW BOSTON DIVISI
Permit Number: P0116521
Facility ID: 0773010180
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P919, South Rotary Cooling Drum

Operations, Property and/or Equipment Description:

South Cooling Drum: continuous rotary cooling drum controlled with the wheelabrator cartridge collector (WCC) and the east foundry dust collector (EFDC) baghouses (replacing the existing south cooling drum formerly permitted as EU P908).

- 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. 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.	ORC 3704.03(T)	Vent to the existing WCC baghouse designed to meet 0.015 grain PM per dry standard cubic foot of exhaust gases. Vent to the existing EFDC baghouse designed to meet 0.015 grain PM per dry standard cubic foot of exhaust gases. See b)(2)c.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid NSR and Title V thresholds)	Particulate emissions (PE) from the WCC shall not exceed 13.03 tons per year, as a rolling, 12-month summation. PE from the EFDC shall not exceed 19.78 tons per year, as a rolling, 12-month summation.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Fugitive PE from this emissions unit shall not exceed 1.64 tons per year, as a rolling, 12-month summation. See b)(2)a and d.
c.	OAC rule 3745-17-07(A)	See b)(2)b.
d.	OAC rule 3745-17-11(B)	The particulate emissions limitation specified by this rule is less stringent than the particulate emissions limitation established pursuant to ORC 3704.03(T).
e.	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
f.	OAC rule 3745-17-08(B)	The permittee is not located within an "Appendix A" area as identified 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 3745-17-07(B).
e.	40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880 – 63.10906) U.S. EPA's generally available control technology (GACT) and/or management practices for area source categories of HAPs, that have been implemented through the "Integrated Urban Air Toxic Strategy" (64 FR 38715) and promulgated under Section 112(d)(5) of the Clean Air Act, are regulated by the U.S. EPA. [In accordance with 40 CFR 63.10880(a), this facility is classified as an area source.]	See Facility-Wide Term and Condition B.2.

(2) Additional Terms and Conditions

- a. Permit to Install and Operate P0116521 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 Major New Source Review (NSR) and Title V status:



- i. limiting the annual operating hours of the cooling drum to no more than 6,000 hours per year; and
 - ii. particulate emissions shall be vented to the WCC and EFDC baghouses and shall not exceed 0.015 grain per dry standard cubic foot of exhaust gases, whenever the emissions unit is in operation.
 - b. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) in accordance with PTI 07-00487, issued final 7/13/00, for other facility existing emissions units P906 (shakeout) and P910 (shakeout) which vent to the EFDC and P913, P915 and P916 which vent to the WCC.
 - c. The south cooling drum collection efficiency hooding shall have a collection efficiency sufficient to minimize or eliminate visible emissions of fugitive dust at points of capture to the extent possible with good engineering design.
 - d. Hazardous air pollutant (HAP) emissions from this facility shall not exceed 9.9 tons per year for any individual HAP and/or 24.9 tons per year for total combined HAPs.
 - e. For the purposes of this permit, all PM, PM₁₀ and PM_{2.5} emissions are equal to the PE emissions.
- c) Operational Restrictions
- (1) The maximum annual operating hours for this emissions unit shall not exceed 6,000 hours, based upon a rolling, 12-month summation of the operating hours.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The acceptable range established for the pressure drop across the EFDC baghouse is between 2 to 9 inches of water and for the WCC baghouse is between 4 to 12 inches of water.
 - (2) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;



- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and 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 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 eliminate the 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 item (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.

- (4) The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month; and
 - b. the rolling, 12-month summation of the operating hours.
- (5) The permittee shall collect and record the following information for each month for emissions units P005, P009, P012, P014, P906, P910, P915, P916, P917 and P919:
 - a. the quantity of metal melted and poured, in tons;
 - b. the amount of isoset sand processed, in tons;
 - c. the facility-wide individual HAP and facility-wide total combined HAP emissions, in tons (i.e., the values from d)(5)a and d)(5)b above multiplied by the appropriate HAP emission factors specified in the HAP potential to emit spreadsheet submitted in association with the permit application for FEPTO P0091377); and
 - d. the rolling, 12-month summations of facility-wide individual HAP and facility-wide total combined HAPs emissions, in tons.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;



- ii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
- iii. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
- iv. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
- v. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
- vi. any exceedances of the rolling, 12-month restriction on the hours of operation for this emissions unit; and
- vii. all exceedances of the rolling, 12-month summations of facility-wide individual HAP and facility-wide total combined HAP emission limitations.

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

The quarterly reports shall be submitted as hardcopy or electronically through Ohio EPA Air Services, each year by the 31st of January (covering October to December), the 30th of April (covering January to March), the 31st of July (covering April to June), and the 31st of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - c. any corrective actions taken to eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the in the Authorization section of this permit. The PER shall cover a reporting period of not 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. Emission Limitation:

PE from the WCC baghouse stack shall not exceed 0.015 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Compliance with the gr/dscf emission limitation shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

b. Emission Limitation:

PE from the EFDC baghouse stack shall not exceed 0.015 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Compliance with the gr/dscf emission limitation shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitation:

PE from the WCC stack shall not exceed 13.03 tons per year, as a 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 pounds per ton.

d. Emission Limitation:

PE from the EFDC stack shall not exceed 19.78 tons per year, as a 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 pounds per ton.



e. Emission Limitation:

Fugitive PE from this emissions unit shall not exceed 1.64 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the 0.65 pound per ton emission factor by the maximum sand handled, in tons/hour, times 0.01 assuming a 99 % capture efficiency by the baghouse multiplied by the rolling, 12-month total hours of operation of the emissions unit, and then dividing by 2,000 pounds per ton. The particulate emission factor was obtained from AP-42 Emission Factors for Iron Foundries, Appendix C dated August 1990.

f. Emission Limitation:

HAP emissions from this facility shall not exceed 9.9 tons per year for any individual HAP and/or 24.9 tons per year for total combined HAPs.

Applicable Compliance Method:

Compliance with the facility-wide individual HAP and facility-wide total combined HAP emission limitations shall be based upon the record keeping requirements specified in d)(5).

(2) The permittee shall conduct, or have conducted, emission testing for the EFDC and WCC in accordance with the following requirements:

- a. The emission testing shall be conducted within 6 months after issuance of the permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A.

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 Portsmouth 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 Portsmouth 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 Portsmouth Local Air Agency's refusal to accept the results of the emission test(s).
 - f. Personnel from the Portsmouth 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 Portsmouth 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 Portsmouth Local Air Agency.
- g) Miscellaneous Requirements
- (1) None.