



9/4/2014

Certified Mail

Curtis Dowell  
 Alliance Casting Co. LLC  
 1001 E Broadway St  
 Alliance, OH 44601

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
 Facility ID: 1576010014  
 Permit Number: P0116125  
 Permit Type: Initial Installation  
 County: Stark

|     |                                    |
|-----|------------------------------------|
| No  | TOXIC REVIEW                       |
| No  | PSD                                |
| Yes | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No  | CEMS                               |
| No  | 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 |

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
 77 South High Street, 17th Floor  
 Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Canton City Health Department at (330)489-3385 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Erica R. Engel-Ishida, Interim Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA  
Canton; Pennsylvania; West Virginia



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install**

for

Alliance Casting Co. LLC

|                |                      |
|----------------|----------------------|
| Facility ID:   | 1576010014           |
| Permit Number: | P0116125             |
| Permit Type:   | Initial Installation |
| Issued:        | 9/4/2014             |
| Effective:     | 9/4/2014             |





**Division of Air Pollution Control  
Permit-to-Install**

for  
Alliance Casting Co. LLC

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**Final Permit-to-Install**  
Alliance Casting Co. LLC  
**Permit Number:** P0116125  
**Facility ID:** 1576010014  
**Effective Date:** 9/4/2014

## Authorization

Facility ID: 1576010014  
Facility Description: Steel foundry.  
Application Number(s): A0049548, A0051396  
Permit Number: P0116125  
Permit Description: Installation of a EMI CB800 Core Making Line at an existing steel foundry. Core Making Line to consist of three sand silos, three electrically heated sand heaters, a sand/resin mixer and the CB800 Core Machine. Sources controlled by baghouse and scrubber.  
Permit Type: Initial Installation  
Permit Fee: \$1,000.00  
Issue Date: 9/4/2014  
Effective Date: 9/4/2014

This document constitutes issuance to:

Alliance Casting Co. LLC  
1001 E Broadway St  
Alliance, OH 44601-2602

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

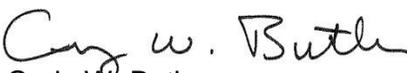
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Canton City Health Department  
420 Market Avenue  
Canton, OH 44702-1544  
(330)489-3385

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

  
Craig W. Butler  
Director



**Final Permit-to-Install**  
Alliance Casting Co. LLC  
**Permit Number:** P0116125  
**Facility ID:** 1576010014  
**Effective Date:** 9/4/2014

## Authorization (continued)

Permit Number: P0116125

Permit Description: Installation of a EMI CB800 Core Making Line at an existing steel foundry. Core Making Line to consist of three sand silos, three electrically heated sand heaters, a sand/resin mixer and the CB800 Core Machine. Sources controlled by baghouse and scrubber.

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

|                                   |                             |
|-----------------------------------|-----------------------------|
| <b>Emissions Unit ID:</b>         | <b>P050</b>                 |
| Company Equipment ID:             | CB800 Core Making Operation |
| Superseded Permit Number:         |                             |
| General Permit Category and Type: | Not Applicable              |



**Final Permit-to-Install**  
Alliance Casting Co. LLC  
**Permit Number:** P0116125  
**Facility ID:** 1576010014  
**Effective Date:** 9/4/2014

## **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) 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 Canton City Health Department.



- (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 Canton City Health Department. 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 to the Canton City Health Department 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 Canton City Health Department 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) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted



local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (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.
- c) The permittee shall submit progress reports to the Canton City Health Department 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 Canton City Health Department.
- 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 Canton City Health Department. 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, 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) not exempt from the requirement to obtain a Permit-to-Install.

**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 permittee 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 "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director 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.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- 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 operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.



**13. Construction Compliance Certification**

The applicant shall identify the following dates in the "Air Services" 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 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.



**Final Permit-to-Install**  
Alliance Casting Co. LLC  
**Permit Number:** P0116125  
**Facility ID:** 1576010014  
**Effective Date:** 9/4/2014

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install**  
Alliance Casting Co. LLC  
**Permit Number:** P0116125  
**Facility ID:** 1576010014  
**Effective Date:** 9/4/2014

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.



**Final Permit-to-Install**  
Alliance Casting Co. LLC  
**Permit Number:** P0116125  
**Facility ID:** 1576010014  
**Effective Date:** 9/4/2014

## **C. Emissions Unit Terms and Conditions**



**1. P050, CB800 Core Making Operation**

**Operations, Property and/or Equipment Description:**

CB800 Core Making operation line consisting of an EMI CB800 core machine and a Mixer. The dry materials mixer emission outlet is controlled by the existing D023 baghouse. The gaseous catalyst used in the EMI CB800 core machine is dimethylisopropylamine ("DIMPA"). DIMPA is not a HAP. The Core Machine emissions outlet is controlled by the existing D019 packed bed acid scrubber.

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(D)<br>[Federally enforceable limitations to avoid PSD] | <p>Volatile organic compound emissions (VOC) from this emissions unit shall not exceed 39.320 tons per year (tpy) (stack and fugitive combined), based upon a rolling, 12-month summation of the monthly emissions</p> <p>VOC emissions from the D019 scrubber stack shall not exceed 0.0025 pounds (lbs) VOC as DMIPA per pound (lb) resin used</p> <p>Fugitive VOC emission from the resin shall not exceed 0.050 lbs per lb resin used</p> <p>Particulate matter less than or equal to 10 microns in size (PM<sub>10</sub>) from this emission unit shall not exceed 3.070 tons per year (tpy) (stack and fugitive combined), based upon a rolling, 12-month summation of the monthly emissions</p> <p>PM<sub>10</sub> emissions from the D019 scrubber stack shall not exceed 0.005 grains per</p> |



|    | Applicable Rules/Requirements   | Applicable Emissions Limitations/Control Measures  |
|----|---|--|
|    |   | dry standard cubic foot (gr/dscf)<br><br>PM <sub>10</sub> emissions from the D023 baghouse stack shall not exceed 0.020 gr/dscf<br><br>See b)(2)a. through b)(2)c.   |
| b. | OAC rule 3745-17-07(A)<br><br><br><br>OAC rule 3745-17-07(A)(2)   | Visible particulate emissions from the stacks serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule<br><br>It shall be deemed not to be a violation of this rule where the presence of uncombined water is the only reason for failure of a stack emission to meet the requirements of this rule |
| c. | OAC rule 3745-17-11(B)<br>[particulate emissions not to exceed allowable emissions from Curve P-1 of Figure II or Table I in the appendix to this rule] | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D)   |
| d. | ORC 3704.03(T)<br>[BAT for > 10 tpy pollutants]   | See b)(2)d.  |
| e. | OAC rule 3745-31-05(A)(3), as effective 11/30/01<br>[BAT for < 10 tpy pollutants]   | See b)(2)e.  |
| f. | OAC rule 3745-31-05(A)(3), as effective 1/01/06<br>[BAT exemption for < 10 tpy pollutants].   | See b)(2)f.  |

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) for PM<sub>10</sub>. The PTE is being restricted such that the emission increase for PM<sub>10</sub> allowed for in Permit to Install (PTI) P0116125 will be below the Prevention of Significant Deterioration (PSD) “significant threshold” applicability level of 15 tpy for PM<sub>10</sub>. The federally enforceable emission limitations for PM<sub>10</sub> are the following:
  - i. Throughput of dry materials shall not exceed 49,000 tons per year (tpy), based upon a rolling, 12-month summation of dry material usage.



- ii. The emissions from the new mixer shall be vented to a fabric filter baghouse (D023) which shall be operated at all times when the new mixer is operated.
- b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) for VOC. The PTE is being restricted such that the emission increase for VOC allowed for in Permit to Install (PTI) P0116125 will be below the Prevention of Significant Deterioration (PSD) "significant threshold" applicability level of 40 tpy for VOC. The federally enforceable emission limitations for VOC are the following:
  - i. Throughput of resin shall not exceed 735 tons per year (tpy), based upon a rolling, 12-month summation of monthly resin combined.
  - ii. The emissions from the core machine shall be vented to a packed bed acid scrubber (D019) which shall be operated at all times per c)(1) when the core machine is operated.
- c. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size ( $PM_{2.5}$ ) are being implemented through the  $PM_{10}$  Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that  $PM_{10}$  is a reasonable surrogate for  $PM_{2.5}$ , all emissions of  $PM_{10}$  will be considered  $PM_{2.5}$ .
- d. Best Available Technology (BAT) requirements for VOC emissions under ORC 3704.03(T) have been determined to be in compliance with the annual emission limitation for VOC as established pursuant to OAC rule 3745-31-05(D).
- e. Best Available Technology (BAT) requirements for  $PM_{10}$  emissions under OAC rule 3745-31-05(A)(3), as effective November 30, 2001 have been determined to be compliance with the annual emission limitations for  $PM_{10}$  as established pursuant to OAC rule 3745-31-05(D).

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants 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 revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

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

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



The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of PM<sub>10</sub> from this air contaminant source since the potential to emit is less than ten tons per year, taking into account the federally enforceable restriction on the amount of dry materials processed and the use of a baghouse when the emission unit is operated

c) Operational Restrictions

- (1) The scrubber shall employ a safety "inter-lock circuit" that is connected to the core making machine. The circuit shall be designed and installed to insure that the scrubber is operating before amine based catalyst is introduced to the core making machine.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
  - a. the quantity of dry materials processed, in tons;
  - b. the quantity of dry materials processed rolling, 12-month summation, in tons, i.e., the summation of the monthly dry materials processed from a. above for the most recent month and the previous 11 months;
  - c. the quantity of resin processed, in tons;
  - d. the quantity of resin processed rolling, 12-month summation, in tons, i.e., the summation of the monthly resin processed from c. above for the most recent month and the previous 11 months;
  - e. the total VOC emissions (stack and fugitive), in tons;
  - f. the total VOC emissions (stack and fugitive) rolling, 12-month summation, in tons, i.e., the summation of the monthly total VOC emissions (stack and fugitive) from e. above for the most recent month and the previous 11 months;
  - g. the total PM<sub>10</sub> emissions (stack and fugitive), in tons; and
  - h. the total PM<sub>10</sub> emissions (stack and fugitive) rolling, 12-month summation, in tons, i.e., the summation of the monthly total PM<sub>10</sub> emissions (stack and fugitive) from g. above for the most recent month and the previous 11 months.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the recirculating scrubber solution pH, the recirculating scrubber solution flow rate, the pressure drop across the scrubber and the pressure drop across the baghouse while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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



- a. recirculating scrubber solution pH recorded as 1-hour averages of the continuous measurement,
- b. the recirculating scrubber solution flow rate, in gallons per minute (gpm), on a once-per-shift basis
- c. the pressure drop across the scrubber on a once-per-shift basis,
- d. the pressure drop across the baghouse on a once-per-day basis, and
- e. the time periods when the emissions unit was in operation and the D023 baghouse was not operated.

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

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

- f. The D019 recirculating scrubber solution pH shall be in the range of 0 to 4.5, the recirculating scrubber solution flow rate shall be maintained at or above 8 gpm, and the pressure drop across the scrubber shall be within 1.0 and 6.0 inches of water at all times while the emissions unit is in operation.
  - g. The pressure drop across the D023 baghouse shall be maintained within the range of 1.0 to 7.0 in inches of water, while the emission unit is in operation. The pressure drop shall not be considered outside the normal range when the pressure drop falls below the minimum point in the pressure drop differential range as the result of bag replacements.
- (3) The permittee shall perform daily checks, when the emissions units are in operation and when the weather conditions allow, for any visible particulate emissions from each stack servicing these emissions units. The checks shall be performed daily for the first 6



months after the emissions units has been installed and started operation. After the 6 months is complete, the checks shall be performed weekly.

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. 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 daily 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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following:
  - a. the rolling, 12-month restriction on the quantity of dry materials processed;
  - b. the rolling, 12-month restriction on the quantity of resin processed;
  - c. the rolling, 12-month restriction on total VOC emissions (stack and fugitive);
  - d. the rolling, 12-month restriction on total PM<sub>10</sub> emissions (stack and fugitive); and
  - e. any time periods when the emissions unit was in operation and the D023 baghouse was not operated.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit along with any deviations that are not specified above



- (2) The permittee shall submit semi-annual written reports that identify the following information concerning the operation of the D019 packed bed acid scrubber and D023 baghouse during the operation of the emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the D019 recirculating scrubber solution pH, the recirculating scrubber solution flow rate, or the pressure drop was outside of the range for each parameter specified in this PTI;
  - b. each period of time (start time and date, and end time and date) when the D023 pressure drop was outside of the range for each parameter specified in this PTI;
  - c. each incident of deviation described in a. or b. above where a prompt investigation was not conducted;
  - d. each incident of deviation described in a. or b. above where prompt corrective action, that would bring the monitored parameter values into compliance with the acceptable range(s), was determined to be necessary and was not taken; and
  - e. each incident of deviation described in a. or b. above 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;
  - f. all days during which any visible particulate emissions, excluding water vapor, were observed from the stack(s) and;
  - g. the corrective actions, if any, taken to eliminate the visible particulate emissions.

If no deviations/excursions occurred during the 6-month period, the report shall so state that no deviations occurred during the reporting period.

The semi-annual deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of 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:

Volatile organic compound emissions (VOC) from this emissions unit shall not exceed 39.320 tons per year (tpy) (stack and fugitive combined), based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The emission limitation was established by the resulting calculation below.

VOC emission (in lb) = (throughput of resin, in lb) x (0.0535 lb VOC/lb resin)



The quantity of resin in any one month is known from the recordkeeping specified in d)(1). The annual quantity is limited to the restricted value in term b)(2)b.

Derivation of 0.0535 lb VOC/lb of resin processed emission factor is as follows:

- i. The fugitive emission limitation of 0.050 lb VOC/lb of resin (uncontrolled) (see f)(1)c.)
- ii. The stack emission limitation of 0.0025 lb VOC as DMIPA/lb of resin (see f)(1)b.)
- iii. The fugitive (uncaptured) VOC as DMIPA of 0.001 lb VOC as DMIPA/lb of resin derived from:
  - (a) An emission factor of 0.1 lb DMIPA catalyst/lb resin was supplied by the permittee in the application. The factor was based on a usage ratio.
  - (b) A DMIPA catalyst capture efficiency for the EMI CB800 machine of 99.00% was supplied by the permittee in the application based on the core machine core box being sealed prior to catalyst addition and ventilation requirements of the core machine manufacturer.
  - (c) Therefore,  $0.1 \times (1 - 0.99) = 0.001$  lb VOC as DMIPA/lb of resin
- iv. Total emission factor is as follows:  
 $0.050 + 0.0025 + 0.001 = 0.0535$

Total VOC emissions are as follows:

$$0.0535 \times (735 \text{ tons resin/yr}) \times (2000 \text{ lb resin/ton resin}) \times (1 \text{ ton VOC}/2000 \text{ lb VOC}) = 39.32 \text{ tons VOC}$$

**b. Emission Limitation:**

VOC emissions from the D019 scrubber stack shall not exceed 0.0025 pounds (lbs) VOC as DMIPA per pound (lb) resin used

**Applicable Compliance Method:**

The emission limitation was established by the resulting calculation below. Compliance shall be demonstrated by the performance testing required in f)(2) below.

Derivation of 0.0025 lb VOC as DMIPA/lb of resin processed emission factor is as follows:

- i. An emission factor of 0.1 lb DMIPA catalyst/lb resin was supplied by the permittee in the application. The factor was based on a usage ratio.



ii. A DMIPA catalyst capture efficiency for the EMI CB800 machine of 99.00% was supplied by the permittee in the application based on the core machine core box being sealed prior to catalyst addition and ventilation requirements of the core machine manufacturer.

iii. The permittee agreed to a DMIPA catalyst control efficiency of 97.5% for the D019 scrubber as demonstrated by a stack test conducted on July 27, 2007 for existing EUs P047, P048, and P049.

iv. Final calculations as follows:

$$\text{Stack Emissions: } 0.1 \times 0.99 \times (1-0.975) = 0.002475 \approx 0.0025$$

c. Emission Limitation:

Fugitive VOC emission from the resin shall not exceed 0.050 lbs per lb resin used

Applicable Compliance Method:

The lb/lb resin emission limitation was established based on Ohio Cast Metals Association (OCMA) test data from the resin supplier, Ashland Chemical, supplied by the permittee in the application.

d. Emission Limitation:

Particulate matter less than or equal to 10 microns in size ( $PM_{10}$ ) from this emission unit shall not exceed 3.070 tons per year (tpy) (stack and fugitive combined), based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The emission limitation was established by the resulting calculation below.

The  $PM_{10}$  emissions are from the mixer exhausted to the baghouse, and the core machine exhausted to the scrubber.

The quantity of dry materials in any one month is known from the recordkeeping specified in d)(1). The annual quantity is limited to the restricted value in term b)(2)b

i. Fugitive  $PM_{10}$  emission from Mixer:

The general equations used are as follows:

$$\text{Fugitive } PM_{10} \text{ emission (in lb)} = (\text{throughput of materials in tons}) \times (\text{EF lb } PM_{10} / \text{ton materials}) \times (1 - \text{Cap Eff}).$$

Where,

EF = Emission factor



Cap Eff = Capture efficiency of total emissions generated to control device

EF = 0.26 lb PM<sub>10</sub> /ton of dry materials, based on PM<sub>10</sub> emission factor in the Ohio RACM guide Table 2.7-1 of 0.30 lb/ton from sand mixing and multiplied by 85% of PM is equal to PM<sub>10</sub> from the USEPA PM calculator for SCC 30400350.

Cap Eff = 99.0% supplied in permit application as engineering estimate of design and expressed as decimal fraction of 0.99.

Throughput = 49,000 tons per year total combined from term b)(2)b.

Fugitive PM<sub>10</sub> emission (in lb) = 0.26 x 49,000 x (1-0.99) = 127.4 lbs

Fugitive PM<sub>10</sub> emission (in tons/yr) = 127.4 ÷ 2000 lbs/ton = 0.064 tpy

ii. Stack PM<sub>10</sub> emissions from the Mixer:

Emissions from the mixer are exhausted to the D023 baghouse. Stack emissions are equal to the emission limitation of 0.020 gr/dscf (see f)(1)f.)

Design acfm of the D023 baghouse = 2000 acfm

Assume acfm is equivalent to dscf

Conversion to tons per year:

0.020 gr/dscf ÷ 7000 gr/lb x 2000 acfm x 60 min/hr x 8760 hrs/yr ÷ 2000 lbs/ton = 1.502 tpy

iii. Core Machine:

Emissions from the core machine are exhausted to the D019 scrubber. No fugitives are anticipated. Stack emissions are equal to the emission limitation of 0.005 gr/dscf (see f)(1)e.)

Design acfm of the D019 scrubber = 8000 acfm

Assume acfm is equivalent to dscf

Conversion to tons per year:

0.005 gr/dscf ÷ 7000 gr/lb x 8000 acfm x 60 min/hr x 8760 hrs/yr ÷ 2000 lbs/ton = 1.502 tpy

iv. Total PM<sub>10</sub> emission:

0.064 + 1.502 + 1.502 = 3.068 ≈ 3.070 tpy



e. Emission Limitation:

PM<sub>10</sub> emissions from the D019 scrubber stack shall not exceed 0.005 gr/dscf

Applicable Compliance Method:

The emission limitation was established based on the information provided by the permittee in the application as to the performance of the scrubber technology utilized.

Compliance shall be demonstrated by the performance testing required in f)(2) below.

f. Emission Limitation:

PM<sub>10</sub> emissions from the D023 baghouse stack shall not exceed 0.020 gr/dscf

Applicable Compliance Method:

The emission limitation was established based on the information provided by the permittee in the application as to the performance of the baghouse technology utilized.

Compliance shall be demonstrated by the performance testing required in f)(2) below.

g. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Initial compliance shall be demonstrated by the performance testing required in f)(2) below.

For ongoing compliance, if requested, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources" or as amended. Alternative or equivalent methods can be used with the approval of the director.

h. Operational Restriction:

Throughput of dry materials shall not exceed 49,000 tons per year (tpy), based upon a rolling, 12-month summation of dry material usage.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(1).



i. Control Measure:

The emissions from mixer shall be vented to a fabric filter baghouse which shall be operated at all times when the mixer is operated.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(2)(e) for the operation of the baghouse.

j. Operational Restriction:

Throughput of resin shall not exceed 735 tons per year (tpy), based upon a rolling, 12-month summation of monthly resin.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(1).

k. Control Measure:

The emissions from the core machine shall be vented to a packed bed acid scrubber which shall be operated at all times per c)(1) when the core machine is operated.

Applicable Compliance Method:

Compliance shall be demonstrated by complying with c)(1).

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

- a. The emission testing shall be conducted within 60 days of achieving the maximum production rate at which the emissions unit(s) will be operated, but not later than 180 days after initial startup and as required by the Director.
- b. The emission testing shall be conducted to demonstrate compliance with the VOC limitation, the  $PM_{10}$  limitation and the opacity limitation.
- c. For VOC, testing shall be conducted at the D019 scrubber in accordance with the following:
  - i. The outlet DMIPA concentration shall demonstrate compliance with the emission limitation specified in f)(1)b. (plus the emission limitations from the other existing sources exhausted to this device);
  - ii. The method that shall be used to measure the DMIPA shall be: Method 18, from 40 CFR Part 60, Appendix A



- iii. The outlet  $PM_{10}$  concentration shall demonstrate compliance with the emission limitation specified in f)(1)e.
  - iv. The method that shall be used to measure the  $PM_{10}$  shall be: Method 201A, from 40 CFR Part 60, Appendix A
  - v. To demonstrate initial compliance with the opacity limitation, opacity observations shall be conducted at the outlet stack for during all test runs using Method 9 from 40 CFR Part 60, Appendix A.
  - vi. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- d. For  $PM_{10}$ , testing shall be conducted at the D023 baghouse in accordance with the following:
- i. The outlet  $PM_{10}$  concentration shall demonstrate compliance with the emission limitation specified in f)(1)f.
  - ii. The method that shall be used to measure the  $PM_{10}$  shall be: Method 201A, from 40 CFR Part 60, Appendix A
  - iii. To demonstrate initial compliance with the opacity limitation, opacity observations shall be conducted at the outlet stack for during all test runs using Method 9 from 40 CFR Part 60, Appendix A
  - iv. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA
- e. The test(s) shall be conducted while the emissions unit and the three other core machines operation lines, which are also vented to the same control devices, are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Canton City Health Department, Air Pollution Control Division.
- f. The VOC and  $PM_{10}$  emission rates shall be based upon the average of three test runs. Each run shall have a minimum duration of one hour and a minimum sample volume of .003 dry standard cubic meter. Gas stream samples shall be taken simultaneously at the inlet and the outlet of the control devices.
- g. Monitoring and recording of the operating parameters of the scrubber and baghouse specified in term d)(2) above shall be conducted at 10 minute intervals during the duration of the test(s). Hourly averages of the readings shall be used to establish and/or re-verify the parameter ranges or minimum limits specified in that term.
- h. 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).

- i. 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.
- j. 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) For the purposes of compliance with this permit, the word "resin" refers to any combination of resin part 1, resin part 2, and resin additives (such as bench life extenders which are used at about 2% of the resin per the permittee) which are liquid organic compounds used for the purpose of binding the sand together to create the core.