



John R. Kasich, Governor
 Mary Taylor, Lt. Governor
 Craig W. Butler, Director

11/6/2014

Heather Rainwater
 Clow Water Systems Company
 P. O. Box 6001
 2266 South Sixth Street
 Coshocton, OH 43812-6001

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0616010006
 Permit Number: P0116810
 Permit Type: Administrative Modification
 County: Coshocton

Certified Mail

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

Dear Permit Holder:

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

Andrew Hall
 Permit Review/Development Section
 Ohio EPA, DAPC
 50 West Town Street, Suite 700
 P.O. Box 1049
 Columbus, Ohio 43216-1049

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
 Ohio EPA-SEDO; West Virginia

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Clow Water Systems Company

Issue Date: 11/6/2014
Permit Number: P0116810
Permit Type: Administrative Modification
Permit Description: Administrative modification for shell core machine to include revised synthetic minor limitations.
Facility ID: 0616010006
Facility Location: Clow Water Systems Company
2266 South Sixth Street, P. O. Box 6001
Coshocton, OH 43812-6001
Facility Description: Iron Foundries

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Racheal Davies, Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138. Ph: (740)385-8501



Permit Strategy Write-Up
Clow Water Systems Company
Permit Number: P0116810
Facility ID: 0616010006



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Clow Water Systems Company is a ductile iron foundry that manufactures pipe in Coshocton, Ohio (Coshocton County). Clow is an existing PSD facility. The company has requested an administrative modification permit for emissions unit (EU) F066, a specialty shell core machine. EU F066 is a 3.85 ton per hour uncontrolled core making machine processing resin-coated sand and equipped with a 3.0 million BTU/hr natural gas-fired process heater. F066 was originally permitted as a small shell core machine but upon installation, was a large (3.85 ton per hour) shell core machine. Therefore an administrative modification was requested for P0109174.

3. Facility Emissions and Attainment Status:

Except for Franklin Township (in which the Clow facility does not reside), Coshocton County is currently in attainment for all ambient air quality standards. The emissions from the EU authorized by this permit are below PSD significance levels. However, in order to limit emissions increases from the project in the contemporaneous period to accommodate possible future projects, the company has requested federally enforceable restrictions on annual throughput of resin-coated sand in EU F066 to limit the federally enforceable potential to emit of VOC, PE, and PM₁₀.

4. Source Emissions:

The permit for EU F066 authorizes 6.24 tons of VOC emissions per rolling, 12-month period, 0.39 ton of particulate emissions per rolling, 12-month period and 0.35 ton of PM₁₀ emissions per rolling 12-month period from the large shell core machine. These emissions rates are based upon the federally enforceable limit on resin-coated sand throughput of 5,500 tons per rolling, 12-month period.

5. Conclusion:

The operational restrictions, emissions limits, monitoring and record keeping requirements in this permit are sufficient to limit the federally enforceable potentials to emit for VOC, PE and PM₁₀ from EU F066. The federally enforceable restriction on the amount of resin-coated sand processed in EU F066 of 5,500 tons per rolling, 12-month period limits VOC emissions from this EU to 6.24 tons, PE from this EU to 0.39 ton and PM₁₀ emissions from this EU to 0.35 ton per rolling, 12-month period.

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>
VOC	6.24
PE	0.39
PM ₁₀	0.35



DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Clow Water Systems Company

Facility ID:	0616010006
Permit Number:	P0116810
Permit Type:	Administrative Modification
Issued:	11/6/2014
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Clow Water Systems Company

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. Federally Enforceable Standard Terms and Conditions	4
2. Severability Clause	4
3. General Requirements	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting	6
6. Compliance Requirements	6
7. Best Available Technology	7
8. Air Pollution Nuisance	8
9. Reporting Requirements	8
10. Applicability	8
11. Construction of New Sources(s) and Authorization to Install	8
12. Permit-To-Operate Application	9
13. Construction Compliance Certification	10
14. Public Disclosure	10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	10
16. Fees.....	10
17. Permit Transfers	10
18. Risk Management Plans	10
19. Title IV Provisions	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions	13
1. F066, Specialty Shell Core Machine #8.....	14



Draft Permit-to-Install
Clow Water Systems Company
Permit Number: P0116810
Facility ID: 0616010006

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0616010006
Facility Description: Ductile Iron Pipe and Fittings.
Application Number(s): A0050698
Permit Number: P0116810
Permit Description: Administrative modification for shell core machine to include revised synthetic minor limitations.
Permit Type: Administrative Modification
Permit Fee: \$100.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/6/2014
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Clow Water Systems Company
2266 South Sixth Street
P. O. Box 6001
Coshocton, OH 43812-6001

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

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

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Permit-to-Install
Clow Water Systems Company
Permit Number: P0116810
Facility ID: 0616010006

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0116810
Permit Description: Administrative modification for shell core machine to include revised synthetic minor limitations.

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

Emissions Unit ID:	F066
Company Equipment ID:	173.B8 Small Specialty Shell Core Machine
Superseded Permit Number:	P0109174
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
Clow Water Systems Company
Permit Number: P0116810
Facility ID: 0616010006
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted 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 Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) 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 Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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



8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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



Draft Permit-to-Install
Clow Water Systems Company
Permit Number: P0116810
Facility ID: 0616010006

Effective Date: To be entered upon final issuance

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.

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install
Clow Water Systems Company
Permit Number: P0116810
Facility ID: 0616010006

Effective Date: To be entered upon final issuance

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



Draft Permit-to-Install
Clow Water Systems Company
Permit Number: P0116810
Facility ID: 0616010006
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. F066, Specialty Shell Core Machine #8

Operations, Property and/or Equipment Description:

3.85 ton per hour uncontrolled core making machine processing resin-coated sand and equipped with a 3.0 million BTU/hour natural gas-fired process heater; maximum throughput rate of 5,500 tons of resin-coated sand per rolling, 12-month period

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) g)(1)

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) (Synthetic minor to restrict federally enforceable potential to emit of this emissions unit to accommodate future projects)	<p>Volatile organic compound (VOC) emissions shall not exceed 6.24 tons per rolling, 12-month period.</p> <p>Particulate emissions (PE) shall not exceed 0.39 ton per rolling, 12-month period.</p> <p>PM₁₀ emissions shall not exceed 0.35 ton per rolling, 12-month period.</p> <p>See c)(1) below.</p>
b.	OAC rule 3745-31-05(A)(3)	<p>The emissions limitations established pursuant to this rule for VOC, PE and PM₁₀ are equivalent to the emissions limitations established pursuant to OAC rule 3745-31-05(D).</p> <p>See b)(2)a. below.</p>
c.	OAC rule 3745-31-05(A)(3)(a)(ii)	<p>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and PM₁₀ emissions from this air contaminant source since the potential to emit is less than 10 tons/year.</p> <p>The Best Available Technology (BAT)</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emissions rate is less than 10 tons/year taking into account the restriction from OAC rule 3745-31-05(E). See b)(2)b. below.
e.	OAC rules 3745-17-07(B) and 3745-17-08(B)	See b)(2)c. below.

(2) Additional Terms and Conditions

- a. This Best Available Control (BAT) emissions limit applies until U.S. EPA approves Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. This facility is located in Coshocton County, which is not identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions from this emissions unit are exempt from the fugitive dust control requirements and visible emission limitation established in OAC rules 3745-17-08(B) and 3745-17-07(B), respectively.

c) Operational Restrictions

- (1) The permittee has requested a federally enforceable limitation on resin-coated sand throughput for the purposes of limiting potential to emit of VOC, PE and PM₁₀. Therefore, the maximum throughput rate of resin-coated sand shall not exceed 5,500 tons as a rolling, 12-month summation. To ensure compliance during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the throughput levels specified in the following table:

Months(s):	Maximum Cumulative Throughput Rate (Tons):
1-1	458
1-2	917
1-3	1,375



Effective Date: To be entered upon final issuance

Months(s):	Maximum Cumulative Throughput Rate (Tons):
1-4	1,833
1-5	2,291
1-6	2,749
1-7	3,207
1-8	3,665
1-9	4,123
1-10	4,581
1-11	5,039
1-12	5,500

After the first 12 calendar months of operation following the startup of emissions unit F066, compliance with the annual resin-coated sand throughput limitation shall be based upon a rolling, 12-month summation of the resin-coated sand throughput.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the resin-coated sand throughput for each month;
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the resin-coated sand throughput;
 - c. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative resin-coated sand throughput for each calendar month; and
 - d. the rolling, 12-month summation of the total VOC, PE and PM₁₀ emissions.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:



- a. all exceedances of the rolling, 12-month resin-coated sand throughput limitation; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative resin-coated sand throughput rates;
- b. all exceedances of the rolling, 12-month VOC, PE and PM₁₀ emissions limitations specified in b)(1)a.

The quarterly deviation (excursion) 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 b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

VOC emissions shall not exceed 6.24 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the tons per rolling, 12-month period emissions limitation shall be demonstrated based on the following calculation:

$$\text{VOC (tons/rolling, 12-month period)} = \left[\begin{array}{l} \text{(actual tons of resin-coated sand} \\ \text{used per rolling, 12-month period as} \\ \text{determined pursuant to d)(1) X} \\ \text{factor) + (0.033 lb/hr} \\ \text{8,760 hours/yr)] X 1 ton/2,000 lbs} \end{array} \right] \begin{array}{l} \text{VOC} \\ \text{emissions} \\ \text{(hourly PTE of process heater) X} \end{array}$$

Where:

2.218 lbs VOC/ton of sand = VOC emissions factor for process (from permittee's application based on vendor-supplied emissions information).

If required, formulation data or USEPA Method 24 may be used to determine the VOC content of the resin-coated sand.

- b. Emissions Limitation:

PE shall not exceed 0.39 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the ton per rolling, 12-month period emissions limitation shall be demonstrated based on the following calculation:

$$\text{PE (tons/rolling, 12-month period)} = \left[\begin{array}{l} \text{(actual tons of resin-coated sand} \\ \text{used per rolling, 12-month period as} \end{array} \right]$$



Effective Date: To be entered upon final issuance

$$\begin{aligned} & \text{determined pursuant to d)(1) X} && \text{PE emissions factor X} \\ & (1\text{-building settling factor) + (0.021 lb/hr} && \\ & \text{(hourly PTE of process heater) X} && \text{8,760} \\ & \text{hours/yr)] X 1 ton/2,000 lbs} && \end{aligned}$$

Where:

0.35 lb PE/ton of sand = PE emissions factor for process (RACM Table 2.7-1, 9/80); and

70% = control efficiency of building that houses core machine.

c. Emissions Limitation:

PM₁₀ emissions shall not exceed 0.35 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the ton per rolling, 12-month period emissions limitation shall be demonstrated based on the following calculation:

$$\begin{aligned} \text{PM}_{10} \text{ (tons/rolling, 12-month period)} = & \text{[(actual tons of resin-coated sand} \\ & \text{used per rolling, 12-month period as} \\ & \text{determined pursuant to d)(1) X} && \text{PM}_{10} \text{ emissions factor} \\ \text{X (1-building settling factor) + (0.021 lb/hr (hourly} && \\ & \text{PTE of process heater) X 8,760} && \text{hours/yr)]} \\ \text{X 1 ton/2,000 lbs} && \end{aligned}$$

Where:

0.30 lb PM₁₀/ton of sand = PM₁₀ emissions factor for process (RACM Table 2.7-1, 9/80 and PM calculator); and

70% = control efficiency of building that houses core machine

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the “Toxic Air Contaminant Statute” in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install and operate prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new material, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install and operate.