Ohio Environmental Protection Agency

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

8/4/2015

Certified Mail

No	TOXIC REVIEW
No	PSD
No	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

Heather Rainwater
McWane Ductile - Ohio
P. O. Box 6001
2266 South Sixth Street
Coshocton, OH 43812-6001

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0616010006
Permit Number: P0118171
Permit Type: Administrative Modification
County: Coshocton

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

How to give us feedback on your permitting experience

Please complete a survey at 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 by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA
Ohio EPA-SEDO; West Virginia

Response to Comments

Facility ID:	0616010006
Facility Name:	McWane Ductile - Ohio
Facility Description:	Ductile Iron Pipe and Utility Poles
Facility Address:	2266 South Sixth Street P. O. Box 6001 Coshocton, OH 43812-6001 Coshocton County
Permit:	P0118171, Permit-To-Install - Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Coshocton Tribune on 06/18/2015. The comment period ended on 07/18/2015.	
Hearing date (if held)	N/A
Hearing Public Notice Date (if different from draft public notice)	N/A

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

No comments received.

FINAL

Division of Air Pollution Control
Permit-to-Install
for
McWane Ductile - Ohio

Facility ID:	0616010006
Permit Number:	P0118171
Permit Type:	Administrative Modification
Issued:	8/4/2015
Effective:	8/4/2015

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
McWane Ductile - Ohio

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. F019, Roadways and parking areas 14

Authorization

Facility ID:	0616010006
Facility Description:	Ductile Iron Pipe and Utility Poles
Application Number(s):	A0052388
Permit Number:	P0118171
Permit Description:	Administrative modification permit for roadways and parking areas issued in accordance with the terms and conditions agreed upon in the JSSA signed and dated April 3, 2015 (ERAC case number 13-166787). This permit also serves to correct the emissions limitation for this emissions unit, as agreed upon in the JSSA, to account for more accurate information.
Permit Type:	Administrative Modification
Permit Fee:	$100.00
Issue Date:	8/4/2015
Effective Date:	8/4/2015

This document constitutes issuance to:

McWane Ductile - Ohio
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

Authorization (continued)

Permit Number: P0118171
Permit Description: Administrative modification permit for roadways and parking areas issued in accordance with the terms and conditions agreed upon in the JSSA signed and dated April 3, 2015 (ERAC case number 13-166787). This permit also serves to correct the emissions limitation for this emissions unit, as agreed upon in the JSSA, to account for more accurate information.

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

Emissions Unit ID:	**F019**
Company Equipment ID:	Roadways and parking areas
Superseded Permit Number:	P0115187
General Permit Category and Type:	Not Applicable

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 emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements 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 theOhio EPA DAPC, Southeast District Officein 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 <u>obtained before</u>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 enteredupon 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.

B. Facility-Wide Terms and Conditions

1. Facility-Wide Terms and Conditions

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.

C. Emissions Unit Terms and Conditions

1. F019, Roadways and parking areas

Operations, Property and/or Equipment Description:

Paved and unpaved roadways and parking areas

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective June 30, 2008	Develop and implement a site-specific work practice plan designed as described in paragraph d)(1) below to minimize or eliminate fugitive dust emissions. See also paragraph b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the calculated annual emission rate is less than 10 tons/year taking into account the voluntary restriction from OAC rule 3745-31-05(E). See b)(2)b. below.
c.	OAC rule 3745-31-05(E), as effective June 30, 2008	Fugitive particulate emissions (PE) shall not exceed 5.89 tons/year.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

(Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(A)(3)(a)(ii))

b. These requirements apply once U.S. EPA approves the OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

(Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(A)(3)(a)(ii))

c. This facility is not located in an area identified in Appendix A of OAC rule 3745-17-08. Therefore, thefugitive dust emissions are exempt from the visible particulate emission limitation and the reasonablyavailable control measures established in OAC rule 3745-17-07 and OAC rule 3745-17-08, respectively.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Work Practice Plan

The permittee shall develop and implement a site-specific Work Practice Plan designed to minimize or eliminate fugitive dust from the permittees paved and unpaved roadways and parking areas. This Work Practice Plan shall include, at a minimum, the following elements:

a. An identification of each segment of unpaved roadway or parking area for which the plan applies.

b. A determination of the frequency that each roadway or parking area will be inspected to determine if additional control measures are needed.

c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the roadways/parking areas. This form/record should include, at a minimum, the following elements:

i. Roadway or parking area segment inspected;

ii. Date inspected;

iii. Name of employee who either did the inspection or who can verify that the inspection was completed;

iv. Result of the inspection (needs treated or does not need treated);

v. A description of why no treatment was needed;

vi. Date treated;

vii. Name of employee who either treated the segment or who can verify that the segment was treated; and

viii. Method used to treat the segment.

d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA (Southeast District Office) approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the Southeast District Office for review and approval. The permittee shall not begin using the revised Work Practice Plan until such time the Southeast District Office approves its use. If Ohio EPA Southeast District Office does not respond to a request for modified work practice terms within 30 days, the request for modification of the work practice plan may then be submitted to the Assistant Chief, Permitting, DAPC Central Office for approval.

(Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(A)(3)(a)(ii))

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

(Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(A)(3)(a)(ii))

(3) Work Practice Plan Record Keeping

The permittee shall maintain records of the following information:

a. The records required to be collected under the Work Practice Plan, and

b. The date and reason any element of the Work Practice Plan was not implemented.

The permittee shall maintain these records in accordance to the Standard Terms and Conditions of Part I of this permit.

(Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(A)(3)(a)(ii))

e) Reporting Requirements

(1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the Southeast District Office.

(2) The permittee shall submit semi-annual deviation reports concerning any failure to implement the Work Practice Plan in accordance with the reporting requirements of the Standard Terms and Conditions of Part I of this permit.

(Authority for term: OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C))

f) Testing Requirements

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

a. Emission Limitation:

Fugitive PE shall not exceed 5.89 tons/year.

Applicable Compliance Method:

Compliance with fugitive PE limitation shall be determined by using the emission factor equations in Section 13.2.1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 1/11) for paved roadways and Section 13.2.2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for unpaved roadways. Should further updates in AP-42 occur, the most current equations for unpaved roads shall be used. Compliance with fugitive PE limitations shall be determined by posting and enforcing the 15 MPH speed limit on the emissions unit and inspection and conducting vacuum sweeping of the emissions unit, both of which were elements of calculating the fugitive PE limitation.

<u>Paved Roadways:</u>

Calculations for paved roadways were done in accordance with the permittee's application A0052388 submitted December 11, 2014, using the following equation and inputs:

$EF= ((k*(sL)^{0.91}*(W)^{1.02}))*(1-P/4*365))$

Where:

EF = particulate emission factor (lb/VMT)

k = particle size multiplier (lb/VMT) = 0.011 (AP-42, 13.2.1 (2/2011))

sL= road surface silt loading (g/m^2) = 9.7 (AP-42, Table 13.2.1-3 (1/2011))

W = mean vehicle weight (tons) = see permittee's application A0052388 submitted December 11, 2014

P = number of days/year with > 0.01 inch precipitation = 140

Total Vehicle Miles Traveled = 127,948.9 miles/year (as submitted in A0052388)

Assume 95.48% control efficiency for a speed limit of 15 MPH (80% RACM), bi-weekly vacuum sweeping (75% RACM), and natural mitigation (9.59% AP-42 13.2.1)

(122.132 tons of PE uncontrolled) * (1-.9548) = 5.51 tons/year

Unpaved roadways:

EF = $((k*(s/12)^{a}*(W/3)^{b})(365-p)/365))$

Where:

EF = particulate emission factor (lb/VMT)

k = 4.9 (AP-42, 13.2.2 11/2006)

s = surface material silt content (%) = 6% (AP-42, Table 13.2.2-1 (11/2006))

a = 0.7 (AP-42, 13.2.2 11/2006)

W = mean vehicle weight (tons) = 26.64 (as submitted in A0052388)

b = 0.45 (AP-42, 13.2.2 11/2006)

P = number of days/year with > 0.01 inch precipitation = 140

Therefore EF = 4.97 lb/VMT

Maximum travel = 752.72 miles/year (as submitted in A0052388)

(752.72 VMT/year)(4.97 lb/VMT)(1 ton/2,000 lbs) = 1.87 ton/year

Assume 80% control efficiency for speed limit of 15 MPH (RACM)

(1.87 ton/year)(1-.80) = 0.37 ton/year

Total Roadway and Parking Area Emissions:

(5.51 tons/year) + (0.37 ton/year) = 5.89 tons/year

(Authority for term: OAC rule 3745-31-05(E))

g) Miscellaneous Requirements

(1) None.

McWane Ductile - Ohio

F019, ROADWAYS AND PARKING AREAS DEVELOPED WORK PRACTICE PLAN

IDENTIFIED INSPECTION AND VACUUM SWEEPING FREQUENCY FOR THIS WORK PRACTICE PLAN

Inspections of a representative road segment and parking area shall be conducted during all days that the facility is operating. The representative roadway shall be segment R17, or the highest emitting paved roadway at McWane Ductile - Ohio, and the representative parking area shall be P2, or the highest emitting parking area at McWane Ductile - Ohio, according to Exhibit A to this plan.

Vacuum sweeping shall be conducted on an as-needed basis based on the inspections, and a speed limit of 15 MPH shall be posted and enforced. No vacuum sweeping shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with applicable requirements. Any vacuum sweeping that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended.

DESCRIBE THE METHOD THAT RECORDS WILL BE KEPT AND MAINTAINED

Records shall be kept according to a form substantially similar to Exhibit B to this plan, and shall be maintained and accessible by the Environmental Department. Any field recorded data or other documentation required by this plan may be filed in the Environmental Department or scanned electronically.

DESCRIBE THE DEVIATIONS TO THIS PLAN AND RECORDS TO BE SUBMITTED.

Any time this Work Practice Plan is not followed as developed, a deviation to the permit terms and conditions has occurred. This Work Practice Plan identifies the following as deviation to the plan:

(1) Failure to conduct required sweeping;
(2) Failure to post the speed limit as required by the plan; and
(3) Failure to conduct an annual plan review as described by this plan.

All deviations, as described in this Work Practice Plan, shall be submitted as required by the permit terms and conditions.

WORK PRACTICE PLAN REVIEW

At a minimum, this Work Practice Plan shall be reviewed on an annual basis. The purpose of the annual review is to ensure appropriate control measures are available, due to a change in control measures employed, ensure that the sweeping frequency is appropriate, and to update any changes to the road surface conditions (i.e., width, length, or additional road segments). The roadways at McWane Ductile - Ohio have the potential to change due to changes to the facility. Additional roads may be necessary. In addition, traffic patterns may change. The annual review shall be completed by January 31st of each year, beginning in 2016, and cover the previous 12-month observation period.

EXHIBIT A

Ohio Environmental Protection Agency

Final Permit-to-Install
McWane Ductile - Ohio
Permit Number: P0118171
Facility ID: 0616010006
Effective Date:8/4/2015

Ohio Environmental Protection Agency

Final Permit-to-Install
McWane Ductile - Ohio
Permit Number: P0118171
Facility ID: 0616010006
Effective Date:8/4/2015

EXHIBIT B

McWane Ductile - Ohio | **F019 –PAVED ROADWAYS & PARKING AREAS** | **REPORT YEAR:**

Facility ID 0616010006 | **DEVELOPED WORK PRACTICE PLAN** | **MONTH:**

DAY	PAVED ROADWAY AND PARKING AREA SEGMENTS	SEGMENT INSPECTION		INSPECTION RESULTS		REASON WHY NO TREATMENT NEEDED				INSPECTOR (initials)
		YES	NO	Treatment Needed	No Treatment Needed	No Dust Observed	Roadway Wet	Snow Covered	Moisture Content Sufficient	
1	R17									
	P2									
2	R17									
	P2									
3	R17									
	P2									
4	R17									
	P2									
5	R17									
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30	R17									
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31	R17									
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