



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Trumbull County
Application No: 02-2212

CERTIFIED MAIL

August 12, 1998

ELLWOOD ENGINEERED CASTINGS COMPANY
ALEX PIMPINELLA
7158 HUBBARD-MASURY ROAD
HUBBARD, OH 44425

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
NORTHEAST DISTRICT OFFICE, DAPC
MAHONING-TRUMBULL, APC AGENCY

RECEIVED
AUG 17 1998
OHIO EPA NEDO

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

**Permit to Install
Terms and Conditions**

Application No. 02-2212
APS Premise No. 0278000025
Permit Fee: \$200.00

Name of Facility: ELLWOOD ENGINEERED CASTINGS COMPANY

Person to Contact: ALEX PIMPINELLA

Address: 7158 HUBBARD-MASURY ROAD
HUBBARD, OH 44425

Location of proposed source(s): 7158 HUBBARD-MASURY ROAD
HUBBARD, OHIO

Description of proposed source(s):
MOBILE CONTINUOUS MIXER - ENGINEERED CASTING DEPARTMENT MOBI
LE MIXER.

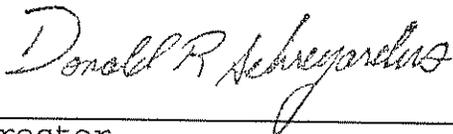
Date of Issuance: August 12, 1998

Effective Date: August 12, 1998

The above named entity is hereby granted a permit to install for the above described source(s) 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 above described source(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 source(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



Director

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Facility Name: **Ellwood Engineered Castings Company**

Application Number: **02-2212**

Date: **August 12, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations.

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Facility Name: **Ellwood Engineered Castings Company**

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Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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Facility Name: **Ellwood Engineered Castings Company**

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BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

Facility Name: **Ellwood Engineered Castings Company**Application Number: **02-2212**Date: **August 12, 1998**AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Ellwood Engineered Castings Company** located in **Trumbull** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source <u>Number</u>	Source Identification <u>Description</u>	BAT <u>Determination</u>	Applicable Federal & <u>OAC Rules</u>	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>
P017	Mobile continuous mixer	Use of fabric filter	3745-31-05 3745-17-07 3745-17-11	2.3 pounds per hour particulate matter 10.1 TPY particulate matter Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	10.1

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

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Facility Name: **Ellwood Engineered Castings Company**

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MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, OH 44087.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. **Applicable State Regulation(s)**

1. The following rules of the Ohio Administrative Code establish the applicable emission limitations and/or control requirements for this source:

OAC Rule 3745-31-05

OAC Rule 3745-17-07

OAC Rule 3745-17-11

(This condition in no way limits the applicability of other requirements of the Ohio Administrative Code to this source.)

B. Source Description

1. The emission units covered by this Permit to Install include: the Mobile Continuous Mixer.

C. Allowable Emission Limitation

1. Particulate emissions shall not exceed 2.3 pounds per hour, based on a process weight of 3.2 pounds of sand per hour.
2. Visible particulate emissions shall not exceed twenty per cent opacity, as a six minute average, for not more than six consecutive minutes in any sixty minutes.

D. Monitoring and Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. the total sand used in the mobile mixer; and,
 - b. the total hours of operation of the mobile mixer.

E. Reporting Requirement

1. The permittee shall submit deviation (excursion) reports of each day during which the average hourly particulate matter emissions exceeded 2.3 pounds per hour.

F. Testing Requirements

1. Compliance with the emission limitation(s) in Section 3 of these Additional Special Terms and Conditions shall be determined in accordance with the following method(s):

a. Emission Limitation

2.3 pounds per hour of particulate matter.

Applicable Compliance Method

To determine the actual emission rate for particulate matter, the following equation shall be used:

$$E = (3.6 \text{ pounds/ton})(S)(1-.95) / (H), \text{ where}$$

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Facility Name: **Ellwood Engineered Castings Company**

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E is the average hourly emission rate of particulate matter (pm)

3.6 pounds/ton is the emission factor for PM in pound per ton of sand used, from AP-42, table 7.10-4

S is the amount of sand used in this process per day

H is the total hours this process operates per day, and,

1-.95 is a correction for the collector efficiency of 95 percent.

If required compliance shall be demonstrated as listed in OAC Rule 3745-17-03(B)(10).

b. Emission Limitation

20 percent opacity limit for visible particulate matter emissions

Applicable Compliance Method

Compliance shall be determined by visible emission evaluations performed in accordance with OAC Rule 3745-17-03(B)(3) using the methods and procedures specified in U.S. EPA Reference Method 9.