



State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL
STARK COUNTY

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 15-01402

DATE: 3/15/00

Ohio Cast Products, Inc.
William Gaynor
2408 13th Street NE
Canton, OH 44705

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of \$2400 will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA
WV

Canton LAA
PA

Stark County Area Trans Study



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: To be entered upon final issuance

DRAFT PERMIT TO INSTALL 15-01402

Application Number: 15-01402
APS Premise Number: 1576050200
Permit Fee: **To be entered upon final issuance**
Name of Facility: Ohio Cast Products, Inc.
Person to Contact: William Gaynor
Address: 2408 13th Street NE
Canton, OH 44705

Location of proposed air contaminant source(s) [emissions unit(s)]:

**2408 13th Street NE
Canton, Ohio**

Description of proposed emissions unit(s):

Induction Furnace #1(P011)Chapter 31 Modification to PTI 15-595 issued 8/8/90, Induction Furnace #2(P022) Chapter 31 Modification to PTI 15-1160 issued 1/11/95 and Ductile Inoculation (P023).

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 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

Director

Ohio Cast Products, Inc.

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Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. 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 appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.
- iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

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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.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. 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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening 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.

7. 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 this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit

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shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. 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:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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 appropriate Ohio EPA District Office or local air agency 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

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10. Permit To Operate Application

- a. If 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 the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

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B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping 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 appropriate Ohio EPA District Office or local air agency.
- 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 appropriate Ohio EPA District Office or local air agency. 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, i.e., 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.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. 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.

5. Termination of Permit To Install

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This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

6. Construction of New Sources(s)

The proposed emissions unit(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 emissions unit(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 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. 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 prove to be inadequate or cannot meet applicable standards.

7. 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.

8. 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).

9. Best Available Technology

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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.

10. 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.

11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only) TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PM/PM ₁₀	28.92
Lead	0.62
VOC	0.44

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
4-ton Coreless Induction Furnace for melting iron controlled by a fabric filter (Chapter 31 modification to PTI 15-595 issued 8/8/90) Furnace No. 1	OAC rule 3745-31-05	PM/PM ₁₀ : Stack: 0.006 gr/DSCF 1.3 lbs/hour (based on an airflow rate of 35,000 ACFM). 5.69 tons/year Fugitive: 0.68 lb/hr 2.96 tons/yr See section A.I.2.a below. Lead: Stack 0.06 lb/hour 0.27 ton/year Fugitive 0.01 lb/hr 0.04 ton/yr
	OAC rule 3745-17-07(A)(1)	Visible emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)(1)	See section A.I.2.b below.
	OAC rule 3745-17-08(B)	BAT is more restrictive.
	OAC rule 3745-17-11(A)	BAT is more restrictive.

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2. Additional Terms and Conditions

- 2.a** At least 90% of the PM/PM₁₀ emissions from this emissions unit shall be captured and vented to a fabric filter.
- 2.b** Visible particulate emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

II. Operational Restrictions

1. The pressure drop across the fabric filter shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation except during startup and initial loading of filters following filter change. New pressure differential ranges can be imposed by either a PTI, a PTO or a Title V permit.
2. The permittee shall comply with the following procedure should any deviation from the above specified pressure differential range be recorded by the permittee:
 - a. promptly determine if the deviation is being caused by a "malfunction," as that term is used in OAC rule 3745-15-06(B), or is not being caused by a malfunction;
 - b. if the deviation is being caused by a malfunction, comply with OAC rule 3745-15-06(B); and
 - c. if the deviation is not being caused by a malfunction, take prompt action to correct the problem causing the deviation if the emissions unit controlled by the fabric filter will continue operation during the duration of the repairs to the fabric filter.
3. The permittee shall submit to the Canton local air agency a Preventative Maintenance and Malfunction Abatement Plan (PMMAP) for the capture hooding system and the fabric filter servicing this emissions unit. This PMMAP shall be submitted within 45 days of completion of construction or installation of the capture hooding system and fabric filter. The PMMAP shall

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include the manufacturer's written specifications, if available, for pressure differential ranges across the baghouse and shall be prepared in accordance with Ohio EPA's Operation and Maintenance Guidelines for Air Pollution Control Equipment and the requirements of OAC rule 3745-15-06(D). Following review of the PMMAP, if the Canton local air agency determines that the PMMAP is deficient and provides the permittee written notice of the deficiencies in the PMMAP, the permittee shall submit a revised PMMAP within 30 days of receipt of the notice of deficiencies. Immediately upon receipt of written approval by the Canton local air agency of the permittee's PMMAP, either as originally submitted or as revised, the permittee shall implement and comply with the approved PMMAP.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a once per shift basis.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified above except during startup and initial loading of filters following filter change.

V. Testing Requirements

1. Compliance with the emission limitation(s) in sections A.I.1. and A.I.2. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

Visible emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:

Visible particulate emissions from any fugitive dust source shall not exceed twenty percent opacity, as a three-minute average.

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Applicable Compliance Method:

Compliance shall be determined through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

c. **Emission Limitation:**

PM/PM₁₀ Stack Emissions:

0.006 gr/DSCF and 1.3 lbs/hour (based on an airflow rate of 35,000 ACFM).

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Applicable Compliance Method:
Emission testing using Methods 1-5.

d. Emission Limitation:

PM/PM₁₀ Fugitive Emissions:
0.68 lb/hr

Applicable Compliance Method:
Multiply the AP-42 emission factor of 0.9 lb PM/ton of iron melted times the maximum PWR of 7.5 tons/hr times 0.1 (90% capture efficiency) equals 0.68 lb PM/hr.

e. Emission Limitation:

Lead Stack Emissions:
0.06 lb/hr

Applicable Compliance Method:
According to the uncontrolled emission factor from FIRE 6.01 SCC 3-04-003-03, lead emissions are 5% of the PM emissions. Multiply the PM allowable of 1.3 lbs/hr (which will be verified in an emissions test) times 0.05, which equals 0.06 lb/hr.

f. Emission Limitation:

Lead Fugitive Emissions:
0.01 lb/hr

Applicable Compliance Method:
The uncontrolled emission factor from FIRE 6.01 SCC 3-04-003-03 for lead emissions is 0.009 lb/ton. Multiply the 0.009 lb/ton times the maximum PWR of 7.5 tons/hr times 0.1 (90% capture efficiency), which equals 0.00675 lb/hr.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

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- a. The emission testing shall be conducted within 45 days of completion of construction or installation of the capture hooding system and fabric filter.
- b. The emissions testing shall be conducted to determine whether the outlet(s) of the fabric filter serving this emissions unit is in compliance with the allowable emission limit of 0.006 gr/dscf for particulate emissions for this fabric filter and to determine the mass emission rate (pounds per hour), grain concentration (gr/dscf), and flow rate [dry standard cubic feet per minute(dscfm)] of the exhaust gases from the outlet(s) of the fabric filter.
- c. During the emissions testing, the gas flow rates from each emissions unit vented into the fabric filter shall be measured.
- d. During the emissions testing, the negative static pressure inside the capture ductwork entrance in inches of water shall be monitored and recorded at 15 minute intervals.
- e. Compliance with the mass emissions limit for particulate emissions shall be determined by multiplying the gas flow rate from each emissions unit (dscfm) by the measured grain loading at the exhaust from the fabric filter (gr/dscf) and multiplying the resulting value by 60 minutes per hour and dividing by 7,000 grains per pound.
- f. USEPA Methods 1 through 5, found in 40 CFR 60 Appendix A, shall be employed to determine the above parameters.
- g. The testing shall be performed while all emissions units vented into the fabric filter are being operated at their maximum production capacities or as close to those capacities as is physically possible.
- h. During the emissions test observations shall be performed by a representative of the Canton local air agency to determine whether the requirement that at least 90% of the PM/PM₁₀ emissions are being captured is being met.

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- i. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Canton local air agency's refusal to accept the results of the emission test(s).

Personnel from the Canton local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the test(s).

VI. Miscellaneous Requirements

1. This permit to install is replacing permit to install 15-595 issued 8/8/90.

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
4-ton Coreless Induction Furnace for melting iron controlled by a fabric filter. (Chapter 31 modification to PTI 15-595 issued 8/8/90) Furnace No. 1		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

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None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-08(B) OAC rule 3745-17-11(A)
4-ton Coreless Induction Furnace for melting iron controlled by a fabric filter. (Chapter 31 Modification replacing PTI 15-1160) Furnace #2	OAC rule 3745-31-05	
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-07(B)(1)	

Ohio (
PTI A

Emissions Unit ID: P022

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Applicable Emissions
Limitations/Control
Measures

PM/PM₁₀:
Stack:
0.006 gr/DSCF
1.3 lbs/hour (based on an
airflow rate of
35,000 ACFM).
5.69 tons/year
Fugitive:
0.68 lb/hr
2.96 tons/yr

See section A.I.2.a below.

Lead:
Stack
0.06 lb/hour
0.27 ton/year
Fugitive
0.01 lb/hr
0.04 ton/yr

Visible emissions from any
stack shall not exceed 20%
opacity, as a six-minute
average, except as provided
by the rule.

See section A.I.2.b below.

BAT is more restrictive.

BAT is more restrictive.

2. Additional Terms and Conditions

2.a At least 90% of the PM/PM₁₀ emissions from this emissions unit shall be captured and vented to a fabric filter.

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- 2.b** Visible particulate emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

II. Operational Restrictions

1. The pressure drop across the fabric filter shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation except during startup and initial loading of filters following filter change. New pressure differential ranges can be imposed by either a PTI, a PTO or a Title V permit.
2. The permittee shall comply with the following procedure should any deviation from the above specified pressure differential range be recorded by the permittee:
 - a. promptly determine if the deviation is being caused by a "malfunction," as that term is used in OAC rule 3745-15-06(B), or is not being caused by a malfunction;
 - b. if the deviation is being caused by a malfunction, comply with OAC rule 3745-15-06(B); and
 - c. if the deviation is not being caused by a malfunction, take prompt action to correct the problem causing the deviation if the emissions unit controlled by the fabric filter will continue operation during the duration of the repairs to the fabric filter.
3. The permittee shall submit to the Canton local air agency a Preventative Maintenance and Malfunction Abatement Plan (PMMAP) for the capture hooding system and the fabric filter servicing this emissions unit. This PMMAP shall be submitted within 45 days of completion of construction or installation of the capture hooding system and fabric filter. The PMMAP shall include the manufacturer's written specifications, if available, for pressure differential ranges across the fabric filter and shall be prepared in accordance with Ohio EPA's Operation and Maintenance Guidelines for Air Pollution Control Equipment and the requirements of OAC rule 3745-15-06(D). Following review of the PMMAP, if the Canton local air agency determines that

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the PMMAP is deficient and provides the permittee written notice of the deficiencies in the PMMAP, the permittee shall submit a revised PMMAP within 30 days of receipt of the notice of deficiencies. Immediately upon receipt of written approval by the Canton local air agency of the permittee's PMMAP, either as originally submitted or as revised, the permittee shall implement and comply with the approved PMMAP.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a once per shift basis.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified above except during startup and initial loading of filters following filter change.

V. Testing Requirements

1. Compliance with the emission limitation(s) in sections A.I.1. and A.I.2. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

Visible emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:

Visible particulate emissions from any fugitive dust source shall not exceed twenty percent opacity, as a three-minute average.

Emissions Unit ID: P022

Applicable Compliance Method:

Compliance shall be determined through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

c. Emission Limitation:**PM/PM₁₀ Stack Emissions:**

0.006 gr/DSCF and 1.3 lbs/hour (based on an airflow rate of 35,000 ACFM).

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Applicable Compliance Method:
Emission testing using Methods 1-5.

d. Emission Limitation:

PM/PM₁₀ Fugitive Emissions:
0.68 lb/hr

Applicable Compliance Method:
Multiply the AP-42 emission factor of 0.9 lb PM/ton of iron melted times the maximum PWR of 7.5 tons/hr times 0.1 (90% capture efficiency) equals 0.68 lb PM/hr.

e. Emission Limitation:

Lead Stack Emissions:
0.06 lb/hr

Applicable Compliance Method:
According to the uncontrolled emission factor from FIRE 6.01 SCC 3-04-003-03, lead emissions are 5% of the PM emissions. Multiply the PM allowable of 1.3 lbs/hr (which will be verified in an emissions test) times 0.05, which equals 0.06 lb/hr.

f. Emission Limitation:

Lead Fugitive Emissions:
0.01 lb/hr

Applicable Compliance Method:
The uncontrolled emission factor from FIRE 6.01 SCC 3-04-003-03 for lead emissions is 0.009 lb/ton. Multiply the 0.009 lb/ton times the maximum PWR of 7.5 tons/hr times 0.1 (90% capture efficiency), which equals 0.00675 lb/hr.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

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- a. The emission testing shall be conducted within 45 days of completion of construction or installation of the capture hooding system and fabric filter.
- b. The emissions testing shall be conducted to determine whether the outlet(s) of the fabric filter serving this emissions unit is in compliance with the allowable emission limit of 0.006 gr/dscf for particulate emissions for this fabric filter and to determine the mass emission rate (pounds per hour), grain concentration (gr/dscf), and flow rate [dry standard cubic feet per minute(dscfm)] of the exhaust gases from the outlet(s) of the fabric filter.
- c. During the emissions testing, the gas flow rates from each emissions unit vented into the fabric filter shall be measured.
- d. During the emissions testing, the negative static pressure inside the capture ductwork entrance in inches of water shall be monitored and recorded at 15 minute intervals.
- e. Compliance with the mass emissions limit for particulate emissions shall be determined by multiplying the gas flow rate from each emissions unit (dscfm) by the measured grain loading at the exhaust from the baghouse (gr/dscf) and multiplying the resulting value by 60 minutes per hour and dividing by 7,000 grains per pound.
- f. USEPA Methods 1 through 5, found in 40 CFR 60 Appendix A, shall be employed to determine the above parameters.
- g. The testing shall be performed while all emissions units vented into the fabric filter are being operated at their maximum production capacities or as close to those capacities as is physically possible.
- h. During the emissions test observations shall be performed by a representative of the Canton local air agency to determine

Emissions Unit ID: P022

whether the requirement that at least 90% of the PM/PM₁₀ emissions are being captured is being met.

- i. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Canton local air agency's refusal to accept the results of the emission test(s).

Personnel from the Canton local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the test(s).

VI. Miscellaneous Requirements

1. This permit to install is replacing permit to install 15-1160 issued 1/11/95.

Ohio (PTI A

Emissions Unit ID: P022

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
4-ton Coreless Induction Furnace for melting iron controlled by a fabric filter. (Chapter 31 Modification replacing PTI 15-1160) Furnace #2		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

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PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: P022

None

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Ductile inoculation of iron controlled by a fabric filter.	OAC rule 3745-31-05	PM/PM ₁₀ : Stack: 0.006 gr/DSCF 0.56 lb/hour (based on an airflow rate of 15,000 ACFM). 2.44 tons/year Fugitive: 6 lbs/hr 9.18 tons/yr VOC: 0.1 lb/hour 0.44 ton/year See sections A.I.2.a and A.I.2.b below.
	OAC rule 3745-17-07(A)(1)	Visible emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)(1)	See section A.I.2.c below.
	OAC rule 3745-17-08(B)	BAT is more restrictive.
	OAC rule 3745-17-11(A)	BAT is more restrictive.

2. Additional Terms and Conditions

- 2.a At least 90% of the particulate emissions shall be captured and vented to a fabric filter.
- 2.b The amount of iron inoculated in any month shall not exceed 3,825 tons.
- 2.c Visible particulate emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

II. Operational Restrictions

- 1. The pressure drop across the fabric filter shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation except during startup and initial loading of filters following filter change. New pressure differential ranges can be imposed by either a PTI, a PTO or a Title V permit.
- 2. The permittee shall comply with the following procedure should any deviation from the above specified pressure differential range be recorded by the permittee:
 - a. promptly determine if the deviation is being caused by a "malfunction," as that term is used in OAC rule 3745-15-06(B), or is not being caused by a malfunction;
 - b. if the deviation is being caused by a malfunction, comply with OAC rule 3745-15-06(B); and
 - c. if the deviation is not being caused by a malfunction, take prompt action to correct the problem causing the deviation if the emissions unit controlled by the fabric filter will continue operation during the duration of the repairs to the fabric filter.
- 3. The permittee shall submit to the Canton local air agency a Preventative Maintenance and Malfunction Abatement Plan (PMMAP) for the capture hooding system and the fabric filter servicing this emissions unit. This PMMAP shall be submitted within 45 days of completion of construction or installation of the capture hooding system and fabric filter. The PMMAP shall include the manufacturer's written specifications, if available, for pressure differential ranges across the fabric filter and shall be prepared in accordance with Ohio EPA's Operation and Maintenance Guidelines for Air Pollution Control Equipment and the requirements of OAC rule

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3745-15-06(D). Following review of the PMMAP, if the Canton local air agency determines that the PMMAP is deficient and provides the permittee written notice of the deficiencies in the PMMAP, the permittee shall submit a revised PMMAP within 30 days of receipt of the notice of deficiencies. Immediately upon receipt of written approval by the Canton local air agency of the permittee's PMMAP, either as originally submitted or as revised, the permittee shall implement and comply with the approved PMMAP.

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III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a once per shift basis.
2. The permittee shall keep monthly records of the amount of iron inoculated in tons.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified above except during startup and initial loading of filters following filter change.
2. The permittee shall submit deviation (excursion) reports that identify any month in which the amount of iron inoculated exceeded 3,825 tons.

V. Testing Requirements

1. Compliance with the emission limitation(s) in sections A.I.1. and A.I.2. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

Visible emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Visible particulate emissions from any fugitive dust source shall not exceed twenty percent opacity, as a three-minute average.

Emissions Unit ID: P023

Applicable Compliance Method:

Compliance shall be determined through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

c. Emission Limitation:

PM/PM₁₀ Stack Emissions:

0.006 gr/DSCF and 0.56 lb/hour (based on an airflow rate of 15,000 ACFM).

Applicable Compliance Method:

Emission testing using Methods 1-5.

d. Emission Limitation:

PM/PM₁₀ Fugitive Emissions:

6 lbs/hr

Applicable Compliance Method:

Multiply the AP-42 emission factor of 4 lbs PM/PM₁₀/ton of iron inoculated times the maximum PWR of 15 tons/hr times 0.1 (90% capture efficiency) equals 6 lbs PM/PM₁₀/hr.

e. Emission Limitation:

The amount of iron inoculated in any month shall not exceed 3,825 tons.

Applicable Compliance Method:

Monthly record keeping as required in section A.III.2.

f. Emission Limitation:

9.18 tons PM/PM₁₀/year

Applicable Compliance Method:

Multiply the AP-42 emission factor of 4 lbs PM/PM₁₀/ton of iron inoculated times the

maximum monthly tonnage of 3,825 tons times 0.1 (90% capture efficiency) times 1 ton/2000 lbs times 12 equals 9.18 tons PM/PM₁₀/year.

- g. Emission Limitation:

0.1 lb VOC/hour

Applicable Compliance Method:

Multiply the FIRE 6.01 SCC 3-04-003-03 emission factor of 0.005 lb VOC/ton of iron inoculated times 15 tons/hour equals 0.075 lbs VOC/hour.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 45 days of completion of construction or installation of the capture hooding system and fabric filter.
 - b. The emissions testing shall be conducted to determine whether the outlet(s) of the fabric filter serving this emissions unit is in compliance with the allowable emission limit of 0.006 gr/dscf for particulate emissions for this fabric filter and to determine the mass emission rate (pounds per hour), grain concentration (gr/dscf), and flow rate [dry standard cubic feet per minute(dscfm)] of the exhaust gases from the outlet(s) of the fabric filter.
 - c. During the emissions testing, the gas flow rates from each emissions unit vented into the fabric filter shall be measured.
 - d. During the emissions testing, the negative static pressure inside the capture ductwork entrance in inches of water shall be monitored and recorded at 15 minute intervals.
 - e. Compliance with the mass emissions limit for particulate emissions shall be determined by

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multiplying the gas flow rate from each emissions unit (dscfm) by the measured grain loading at the exhaust from the baghouse (gr/dscf) and multiplying the resulting value by 60 minutes per hour and dividing by 7,000 grains per pound.

- f. USEPA Methods 1 through 5, found in 40 CFR 60 Appendix A, shall be employed to determine the above parameters.
- g. The testing shall be performed while all emissions units vented into the baghouse are being operated at their maximum production capacities or as close to those capacities as is physically possible.
- h. During the emissions test observations shall be performed by a representative of the Canton local air agency to determine whether the requirement that at least 90% of the PM/PM₁₀ emissions are being captured is being met.
- i. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Canton local air agency's refusal to accept the results of the emission test(s).

Personnel from the Canton local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the

Ohio Cast Products, Inc.
PTI A
Issued

Facility ID: 1576050200

Emissions Unit ID: P023
emissions unit and/or the performance of the
control equipment.

A comprehensive written report on the
results of the emissions test(s) shall be signed
by the person or persons responsible for the
tests and submitted to the Canton local air
agency within 30 days following completion
of the test(s).

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Ohio (

PTI A

Issued: To be entered upon final issuance

VI. Miscellaneous Requirements

Emissions Unit ID: P023

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Ductile inoculation of iron controlled by a fabric filter.		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 15-01402 Facility ID: 1576050200

FACILITY NAME Ohio Cast Products, Inc.

FACILITY DESCRIPTION Induction Furnace #1(P011)Chapter 31 CITY/TWP Canton City
 Modification to PTI 15-595 issued 8/8/90,
 Induction Furnace #2(P022) Chapter 31
 Modification to PTI 15-1160 issued
 1/11/95 and Ductile Inoculation (P023)

SIC CODE 3321 SCC CODE 30400303 EMISSIONS UNIT ID P011

EMISSIONS UNIT DESCRIPTION 4-ton Coreless Induction Furnace with fabric filter for melting iron (Chapter 31 modification to PTI 15-595 issued 8/8/90) Furnace No. 1

DATE INSTALLED 7/90

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment			Stack 0.006 gr/dscf 1.3 lbs/hr Fugitive 0.68 lb/hr	Stack 5.69 Fugitive 2.96
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead				Stack 0.06 lb/hr Fugitive 0.01 lb/hr	Stack 0.27 Fugitive 0.04
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**At least 90% of the particulate emissions captured and vented to a fabric filter with a grain loading of no more than 0.006 gr/DSCF.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$867,000

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 15-01402 Facility ID: 1576050200

FACILITY NAME Ohio Cast Products, Inc.

FACILITY DESCRIPTION Induction Furnace #1(P011)Chanter 31 CITY/TWP Canton Citv

Emissions Unit ID: P023

1/11/95 and Ductile Inoculation (P023)

SIC CODE 3321 SCC CODE 30400303 EMISSIONS UNIT ID P022

EMISSIONS UNIT DESCRIPTION 4-ton Coreless Induction Furnace with fabric filter for melting iron (Chapter 31 Modification replacing PTI 15-1160) Furnace #2

DATE INSTALLED 6/94

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment			Stack 0.006 gr/dscf 1.3 lbs/hr Fugitive 0.68 lb/hr	Stack 5.69 Fugitive 2.96
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead				Stack 0.06 lb/hr Fugitive 0.01 lb/hr	Stack 0.27 Fugitive 0.04
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

At least 90% of the particulate emissions captured and vented to a fabric filter with a grain loading of no more than 0.006 gr/DSCF.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$867,000

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 15-01402 Facility ID: 1576050200

FACILITY NAME Ohio Cast Products, Inc.

FACILITY DESCRIPTION Induction Furnace #1(P011)Chanter 31 CITY/TWP Canton

Emissions Unit ID: P023

1/11/95 and Ductile Inoculation (P023)

SIC CODE 3321 SCC CODE 30400310 EMISSIONS UNIT ID P023

EMISSIONS UNIT DESCRIPTION Ductile Inoculation of Iron with fabric Filter

DATE INSTALLED 6/94

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment			6.56 lbs/hr	11.62
PM ₁₀					
Sulfur Dioxide					
Organic Compounds				0.1	0.44
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

At least 90% of the particulate emissions captured and vented to a fabric filter with a grain loading of no more than 0.006 gr/DSCF.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$867,000

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

4 NEW SOURCE REVIEW FORM B

PTI Number: 15-01402

Facility ID: 1576050200

FACILITY NAME Ohio Cast Products, Inc.

FACILITY DESCRIPTION Induction Furnace #1(P011)Chanter 31 CITY/TWP Canton

Emissions Unit ID: P023

1/11/95 and Ductile Inoculation (P023)**PTI 15-01402****Ohio Cast Products, Inc.(OCP)****15 76 05 0200****EUs P011, P022, P023****This PTI is for three existing emissions units.****P011**

PTI 15-0575 was issued for P011 on 8/8/90. This PTI required that all PM emissions be captured. The capture system was a side draft annular ring exhaust hood. The PM allowables were 0.11 lb/hr, 0.01 gr/dscf and 0.49 ton/yr. The requirement that all PM emissions be captured could not be met by this capture system. OCP attempted to modify this PTI in 1995 and submitted a PTI application in which they requested that during different stages of the melting cycle different capture efficiencies would be met over specific time frames. OCP could not meet these predicted time frames. PTI was never modified to show these new control strategy. On 9/14/99 a Consent Order was issued covering P011 among other emissions units at OCP. PTI 15-01402 reflects the requirements of this Consent Order.

P022

PTI 15-1160 was issued for P022 on 1/11/95. This PTI called for a side draft annular ring exhaust hood with a minimum exhaust volume maintained at 6,500 ACFM during all phases of the furnace operation cycle. This furnace was required to be equipped with a lid, which shall be kept closed at least 50% of the furnace operating cycle. The PM allowables were 3.146 lbs/hr and 13.78 tons/yr. OCP could not meet the requirement to have the lid on at least 50% of the time. On 9/14/99 a Consent Order was issued covering P022 among other emissions units at OCP. PTI 15-01402 reflects the requirements of this Consent Order.

P023

OCP submitted a PTI application in 1995 for this emissions unit. This Agency never issued a PTI for it. This emissions unit was installed in 1992. On 9/14/99 a Consent Order was issued covering P023 among other emissions units at OCP. PTI 15-01402 reflects the requirements of this Consent Order.

The present PTI application calls for a canopy hood to capture the emissions from P011 and P022 and a side draft hood at ladle height to capture the emissions from P023.

Modeling

Although the total PM₁₀ numbers are high enough to require modeling the emissions from these three emissions units should not be totaled.

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FACILITY DESCRIPTION

Induction Furnace #1(P011)Chapter 31
Modification to PTI 15-595 issued 8/8/90,
Induction Furnace #2(P022) Chapter 31
Modification to PTI 15-1160 issued
1/11/95 and Ductile Inoculation (P023)

CITY/TWP Canton

Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

PTI Application, Consent Order, PTI 15-595, PTI 15-1160, PTI and Modeling Discussion.

Please provide any additional permit specific notes as you deem necessary:

This PTI is for three existing emissions units.

P011

PTI 15-0575 was issued for P011 on 8/8/90. This PTI required that all PM emissions be captured. The capture system was a side draft annular ring exhaust hood. The PM allowables were 0.11 lb/hr, 0.01 gr/dscf and 0.49 ton/yr. The requirement that all PM emissions be captured could not be met by this capture system. OCP attempted to modify this PTI in 1995 and submitted a PTI application in which they requested that during different stages of the melting cycle different capture efficiencies would be met over specific time frames. OCP could not meet these predicted time frames. PTI was never modified to show these new control strategy. On 9/14/99 a Consent Order was issued covering P011 among other emissions units at OCP. PTI 15-01402 reflects the requirements of this Consent Order.

P022

PTI 15-1160 was issued for P022 on 1/11/95. This PTI called for a side draft annular ring exhaust hood with a minimum exhaust volume maintained at 6,500 ACFM during all phases of the furnace operation cycle. This furnace was required to be equipped with a lid, which shall be kept closed at least 50% of the furnace operating cycle. The PM allowables were 3.146 lbs/hr and 13.78 tons/yr. OCP could not meet the requirement to have the lid on at least 50% of the time. On 9/14/99 a Consent Order was issued covering P022 among other emissions units at OCP. PTI 15-01402 reflects the requirements of this Consent Order.

P023

OCP submitted a PTI application in 1995 for this emissions unit. This Agency never issued a PTI for it. This emissions unit was installed in 1992. On 9/14/99 a Consent Order was issued covering P023 among other emissions units at OCP. PTI 15-01402 reflects the requirements of this Consent Order.

The present PTI application calls for a canopy hood to capture the emissions from P011 and P022 and a side draft hood at ladle height to capture the emissions from P023.

NEW SOURCE REVIEW FORM B

PTI Number: 15-01402

Facility ID: 1576050200

FACILITY NAME Ohio Cast Products, Inc.

FACILITY DESCRIPTION Induction Furnace #1(P011)Chanter 31 CITY/TWP Canton

Emissions Unit ID: P023

1/11/95 and Ductile Inoculation (P023)Modeling

Although the total PM₁₀ numbers are high enough to require modeling the emissions from these three emissions units should not be totaled.

Permit To Install Synthetic Minor Write-Up**NONE****Please fill in the following for this permit:****TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM/PM ₁₀	28.92
Lead	0.62
VOC	0.44