



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
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: 2/26/2002

Ohio Cast Products, Inc.
Charles Ferra
2408 13th Street NE
Canton, OH 44705

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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 within thirty (30) days after the notice of the Directors 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
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

Canton LAA



**Permit To Install
Terms and Conditions**

**Issue Date: 2/26/2002
Effective Date: 2/26/2002**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 15-01402

Application Number: 15-01402
APS Premise Number: 1576050200
Permit Fee: \$0
Name of Facility: Ohio Cast Products, Inc.
Person to Contact: Charles Ferra
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):
Administrative Modification of the Final PTI 15-01402 issued on 10/9/2001.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

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.10 below if no deviations occurred during the quarter.

- 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

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 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.

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.

11. 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.

12. 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.

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. Termination of Permit To Install

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.

5. 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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit or cannot meet applicable standards.

6. 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.

7. Applicability

Ohio Cast Products, Inc.

Facility ID: 1576050200

PTI Application: 15-01402

Modification Issued: 2/26/2002

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).

8. 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.

9. 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	28.92
PM ₁₀	28.66
Lead	0.62
VOC	0.12

Ohio Cast Products, Inc.

Facility ID: 1576050200

PTI Application: 15-01402

Modification Issued: 2/26/2002

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

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>	
P011- 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 Modification	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08(B)
		OAC rule 3745-17-11(B)(1)

Applicable Emissions
Limitations/Control
Measures

Particulate stack emissions shall not exceed 1.3 pounds per hour (based on an airflow of 35,000 ACFM) and 5.69 tons per year. (See A.I.2.c. below.)

Fugitive particulate emissions shall not exceed 0.68 pound per hour and 2.96 tons per year.

PM10 stack emissions shall not exceed 1.3 pounds per hour and 5.69 tons per year.

PM10 fugitive emissions shall not exceed 0.65 pound per hour and 2.83 tons per year.

Lead stack emissions shall not exceed 0.06 pound per hour and 0.27 ton per year.

Lead fugitive emissions shall not exceed 0.01 pound per hour and 0.04 ton per year.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and (B)(1) and 3745-17-08(B).

Visible particulate 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.a below.

Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See section A.I.2.b. below.)

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Modification Issued: 2/26/2002**2. Additional Terms and Conditions**

- 2.a** 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.
- 2.b** The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
- i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust; and
 - ii. the collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- 2.c** The hourly particulate stack emission rate is calculated at an outlet loading not to exceed 0.006 gr/dscf of airflow from the BACT baghouse.

II. Operational Restrictions

1. The pressure drop across the fabric filter shall be maintained within the manufacturer's recommended range of 2 to 8 inches of water, while the emissions unit is in operation except during start-up and initial loading of filters following filter change, until a pressure drop range that is more representative of actual operating conditions can be established during the next emission testing required in section A.V.2. The appropriate pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCDH, APCD) within 1 month after completion of the emission testing. The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable
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 ninety (90) 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 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.
2. The permittee shall perform daily checks for visible particulate emissions from the non-stack egress points from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any abnormal visible emission incident; and

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- e. any corrective actions taken to eliminate the abnormal visible emissions.

Note: The presence of any visible particulate emissions may or may not indicate a violation of the particulate mass emissions limitation and/or visible emission limitation. If required by the Canton local air agency, compliance with the particulate mass emission limitation and the visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings using USEPA methods and procedures. The results of any required emissions tests and visible emission readings shall be used in determining whether or not the presence of any visible particulate emissions is indicative of a possible violation of the particulate mass emission limitation and/or visible emission limitation.

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 semiannual written reports which (a) identify all days during which any abnormal visible emissions were observed from the non-stack egress points from the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible emissions. These reports shall be submitted to the Director (Canton local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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. Emissions 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 observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

Emissions Unit ID: P011

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

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations 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. Emissions Limitation:
PM/PM₁₀ Stack Emissions:
0.006 gr/DSCF and 1.3 lbs/hour (based on an airflow rate of 35,000 ACFM).

Applicable Compliance Method:

Emission testing using Methods 1-5.

- d. Emissions Limitation:
PM 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. Emissions Limitation:
PM₁₀ Fugitive Emissions:
0.65 lb/hr

Applicable Compliance Method:

Multiply the AP-42 emission factor of 0.86 lb PM/ton of iron melted times the maximum PWR of 7.5 tons/hr times 0.1 (90% capture efficiency) equals 0.65 lb PM/hr.

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- f. Emissions 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.

- g. Emissions 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.

- h. Emissions Limitation
5.69 tons/yr Particulate Stack Emissions
2.96 tons/yr Particulate Fugitive Emissions
5.69 tons/yr PM₁₀ Stack Emissions
2.83 tons/yr PM₁₀ Fugitive Emissions
0.27 ton/yr Lead Stack Emissions
0.04 ton/yr Lead Fugitive Emissions

Applicable Compliance Method

All of the allowable annual emissions are based on the allowable hourly emissions times 8,760 hours/yr times 1 ton/2,000 lbs.

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

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- 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 Part 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. 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's 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 emissions 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). The permittee may request additional time for submittal of a written report, where warranted, with prior written approval from the Canton local air agency.

Ohio Cast Products, Inc.
PTI Application: 15-01402
Modif

Facility ID: 1576050200

Emissions Unit ID: P011

VI. Miscellaneous Requirements

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

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>
P011 - 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 Modification	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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Emissions Unit ID: **P011**

VI. Miscellaneous Requirements

None

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>
P022 - 4-ton Coreless Induction Furnace for melting iron controlled by a fabric filter. (Chapter 31 Modification replacing PTI 15-1160) Furnace No. 2	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(A)(1)
Modification	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B)
	OAC rule 3745-17-11(B)(1)

Applicable Emissions
Limitations/Control
Measures

Particulate stack emissions shall not exceed 1.3 pounds per hour (based on an airflow of 35,000 ACFM) and 5.69 tons per year. (See A.I.2.c below)

Fugitive particulate emissions shall not exceed 0.68 pound per hour and 2.96 tons per year.

PM10 stack emissions shall not exceed 1.3 pounds per hour and 5.69 tons per year.

PM10 fugitive emissions shall not exceed 0.65 pound per hour and 2.83 tons per year.

Lead stack emissions shall not exceed 0.06 pound per hour and 0.27 ton per year.

Lead fugitive emissions shall not exceed 0.01 pound per hour and 0.04 ton per year.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and (B)(1) and 3745-17-08(B).

Visible particulate 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.a below.

Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See section A.I.2.b. below.)

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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2. Additional Terms and Conditions

- 2.a** 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.
- 2.b** The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
- i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust; and
 - ii. the collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- 2.c** The hourly particulate stack emission rate is calculated at an outlet loading not to exceed 0.006 gr/dscf of airflow from the BACT baghouse.

II. Operational Restrictions

1. The pressure drop across the fabric filter shall be maintained within the manufacturer's recommended range of 2 to 8 inches of water, while the emissions unit is in operation except during start-up and initial loading of filters following filter change, until a pressure drop range that is more representative of actual operating conditions can be established during the next emission testing required in section A.V.2. The appropriate pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCDH, APCD) within 1 month after completion of the emissions testing. The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.
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;

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- 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 ninety (90) 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 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.
2. The permittee shall perform daily checks for visible particulate emissions from the non-stack egress points from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;

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- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any abnormal visible emission incident; and
- e. any corrective actions taken to eliminate the abnormal visible emissions.

Note: The presence of any visible particulate emissions may or may not indicate a violation of the particulate mass emissions limitation and/or visible emission limitation. If required by the Canton local air agency, compliance with the particulate mass emission limitation and the visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings using USEPA methods and procedures. The results of any required emissions tests and visible emission readings shall be used in determining whether or not the presence of any visible particulate emissions is indicative of a possible violation of the particulate mass emission limitation and/or visible emission limitation.

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 semiannual written reports which (a) identify all days during which any abnormal visible emissions were observed from the non-stack egress points from the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible emissions. These reports shall be submitted to the Director (Canton local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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. Emissions 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 observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).
 - b. Emissions Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations 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. Emissions Limitation:

PM/PM₁₀ Stack Emissions:

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

Applicable Compliance Method:

Emission testing in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

d. Emissions Limitation:

PM 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. Emissions Limitation:

PM₁₀ Fugitive Emissions:

0.65 lb/hr

Applicable Compliance Method:

Multiply the AP-42 emission factor of 0.86 lb PM/ton of iron melted times the maximum PWR of 7.5 tons/hr times 0.1 (90% capture efficiency) equals 0.65 lb PM/hr.

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- f. Emissions 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.

- g. Emissions 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.

- h. Emissions Limitation
5.69 tons/yr Particulate Stack Emissions
2.96 tons/yr Particulate Fugitive Emissions
5.69 tons/yr PM₁₀ Stack Emissions
2.83 tons/yr PM₁₀ Fugitive Emissions
0.27 ton/yr Lead Stack Emissions
0.04 ton/yr Lead Fugitive Emissions

Applicable Compliance Method

All of the allowable annual emissions are based on the allowable hourly emissions times 8,760 hours/yr times 1 ton/2,000 lbs.

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

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- 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 Part 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. 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's 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 emissions 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). The permittee may request additional time for submittal of a written report, where warranted, with prior written approval from the Canton local air agency.

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VI. Miscellaneous Requirements

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

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>
P022 - 4-ton Coreless Induction Furnace for melting iron controlled by a fabric filter. (Chapter 31 Modification replacing PTI 15-1160) Furnace No. 2 Modification	None	None

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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VI. Miscellaneous Requirements

None

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>
P023 - Ductile inoculation of iron controlled by a fabric filter.	OAC rule 3745-31-05(A)(3)
Modification	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-07(B)(1)
	OAC rule 3745-17-08(B)
	OAC rule 3745-17-11(B)(1)

Applicable Emissions
Limitations/Control
Measures

Particulate stack emissions shall not exceed 0.56 pound per hour (based on an airflow of 15,000 ACFM) and 2.44 tons per year. (See A.I.2.d. below)

Fugitive particulate emissions shall not exceed 6 pounds per hour and 9.18 tons per year.

PM10 stack emissions shall not exceed 0.56 pound per hour (based on an airflow of 15,000 ACFM) and 2.44 tons per year. (See A.I.2.d. below)

PM10 fugitive emissions shall not exceed 6 pounds per hour and 9.18 tons per year.

Volatile Organic Compound (VOC) stack emissions shall not exceed 0.07 pound per hour and 0.11 ton per year.

Volatile Organic Compound (VOC) fugitive emissions shall not exceed 0.01 pound per hour and 0.01 ton per year.

The requirements of this rule

also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and (B)(1) and 3745-17-08(B).

See section A.I.2.a.

Visible particulate 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.

Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See section A.I.2.c. below.)

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The amount of iron inoculated in any month shall not exceed 3,825 tons.
- 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.
- 2.c** The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
- i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust; and
 - ii. the collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- 2.d** The hourly particulate stack emission rate is calculated at an outlet loading not to exceed 0.006 gr/dscf of airflow from the BACT baghouse.

II. Operational Restrictions

1. The pressure drop across the fabric filter shall be maintained within the manufacturer's recommended range of 2 to 8 inches of water, while the emissions unit is in operation except during start-up and initial loading of filters following filter change, until a pressure drop range that is more representative of actual operating conditions can be established during the next emission testing required in section A.V.2. The appropriate pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCDH, APCD) within 1 month after completion of the emission testing. The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.
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 ninety (90) 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 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.
2. The permittee shall keep monthly records of the amount of iron inoculated in tons.
3. The permittee shall perform daily checks for visible particulate emissions from the non-stack egress points from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, windows, and roof monitors. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any abnormal visible emission incident; and
 - e. any corrective actions taken to eliminate the abnormal visible emissions.

Note: The presence of any visible particulate emissions may or may not indicate a violation of the particulate mass emissions limitation and/or visible emission limitation. If required by the Canton local air agency, compliance with the particulate mass emission limitation and the visible emission limitation shall be determined by performing concurrent mass emissions tests and visible emissions readings, using USEPA methods and procedures. The results of any required emissions tests and visible emission readings shall be used in determining whether or not the presence of any visible particulate emissions is indicative of a possible violation of the particulate mass emission limitation and/or visible emission limitation.

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.

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3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible abnormal emissions were observed from the non-stack egress points from the building housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible abnormal emissions. These reports shall be submitted to the Director (Canton local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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. Emissions 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 observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).
 - b. Emissions Limitation:
Visible particulate emissions from any fugitive dust source shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:
Compliance shall be determined through visible emissions observations 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. Emissions 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:
Emissions testing using Methods 1-5.
 - d. Emissions Limitation:
PM/PM₁₀ Fugitive Emissions:

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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.

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- e. Emissions 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.

- f. Emissions Limitation:
Stack VOC Emissions
0.07 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 times 0.9 (90% capture) equals 0.0675 lb VOC/hour.

- g. Emissions Limitation:
Fugitive VOC Emissions
0.01 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 times 0.1 (90% capture) equals 0.0075 lb VOC/hour.

- h. Emissions Limitation:
Stack VOC Emissions
0.11 ton VOC/yr

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 3,825 tons/month times 12 months/yr times 0.9 (90% capture) times 1 ton/2,000 lbs equals 0.11 ton VOC/yr.

- i. Emissions Limitation:
Fugitive VOC Emissions
0.01 ton VOC/yr

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 3,825 tons/month times 12 months/yr times 0.1 (90% capture) times 1

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ton/2,000 lbs equals 0.01 ton VOC/yr.

2. Compliance with the operational limitations of this permit shall be determined in accordance with the following methods:
 - a. Operational Limitation:
The amount of iron inoculated in any month shall not exceed 3,825 tons.

Applicable Compliance Method:
Monthly recordkeeping as required in section A.III.2.
3. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:
 - a. The emissions 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 Part 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.

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- h. 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's 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). The permittee may request additional time for submittal of a written report, where warranted, with prior written approval from the Canton local air agency.

VI. Miscellaneous Requirements

None

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>
P023 - Ductile inoculation of iron controlled by a fabric filter.	None	None
Modification		

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None