



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

6/13/2016

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0616010006  
Permit Number: P0120074  
Permit Type: Initial Installation  
County: Coshocton

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA)Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

**How to appeal this permit**

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

## **What should you do if you notice a spill or environmental emergency?**

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

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

Sincerely,



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

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



**FINAL**

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

|                |                      |
|----------------|----------------------|
| Facility ID:   | 0616010006           |
| Permit Number: | P0120074             |
| Permit Type:   | Initial Installation |
| Issued:        | 6/13/2016            |
| Effective:     | 6/13/2016            |





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

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**Final Permit-to-Install**  
McWane Ductile - Ohio  
**Permit Number:** P0120074  
**Facility ID:** 0616010006  
**Effective Date:**6/13/2016

## Authorization

Facility ID: 0616010006  
Facility Description: Ductile Iron Pipe and Utility Poles  
Application Number(s): A0055004  
Permit Number: P0120074  
Permit Description: Initial installation of a small diameter cold box core machine with associated core wash station and sand silos.  
Permit Type: Initial Installation  
Permit Fee: \$400.00  
Issue Date: 6/13/2016  
Effective Date: 6/13/2016

This document constitutes issuance to:

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

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

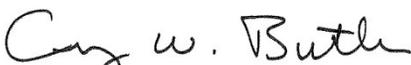
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



**Final Permit-to-Install**  
McWane Ductile - Ohio  
**Permit Number:** P0120074  
**Facility ID:** 0616010006  
**Effective Date:**6/13/2016

## Authorization (continued)

Permit Number: P0120074

Permit Description: Initial installation of a small diameter cold box core machine with associated core wash station and sand silos.

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

|                                   |                             |
|-----------------------------------|-----------------------------|
| <b>Emissions Unit ID:</b>         | <b>K027</b>                 |
| Company Equipment ID:             | K027 Small Laempe Core Wash |
| Superseded Permit Number:         |                             |
| General Permit Category and Type: | Not Applicable              |
| <b>Emissions Unit ID:</b>         | <b>P913</b>                 |
| Company Equipment ID:             | F077                        |
| Superseded Permit Number:         |                             |
| General Permit Category and Type: | Not Applicable              |



**Final Permit-to-Install**  
McWane Ductile - Ohio  
**Permit Number:** P0120074  
**Facility ID:** 0616010006  
**Effective Date:**6/13/2016

## **A. Standard Terms and Conditions**

**1. Federally Enforceable Standard Terms and Conditions**

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

**2. Severability Clause**

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

**3. General Requirements**

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

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

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

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

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 5. Scheduled Maintenance/Malfunction Reporting

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

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

## 6. Compliance Requirements

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

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

**8. Air Pollution Nuisance**

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

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

**13. Construction Compliance Certification**

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

## **B. Facility-Wide Terms and Conditions**

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. Facility-Wide Emission Limitations
  - a) McWane Poles (0616015010) and McWane Ductile - Ohio (0616010006) have been determined to be one facility for permitting purposes under 40 CFR Part 52.21, OAC Chapter 3745-31, and OAC Chapter 3745-77.

The facility-wide (McWane Poles (0616015010) and McWane Ductile - Ohio (0616010006) combined) individual HAP and the facility-wide total combined HAP emissions shall not exceed 9.9 and 24.9 tons per year, respectively, based upon a rolling, 12-month summation of the emission rates from all HAP emitting emissions units at the facility.
3. Operational Restrictions
  - a) The following annual operational restrictions are in place in PTI P0116276 to maintain facility-wide HAPs compliance for McWane Ductile - Ohio (0616010006):
    - (1) 275,000 tons of total metal melted.
  - b) In order to maintain compliance with the facility-wide emission limitations established in PTI P0116276 on HAPS, only materials that contain no organic HAP are to be used at the following McWane Ductile - Ohio (0616010006) emissions units:
    - (1) Pipe Paint Operations – Small Line (K006);
    - (2) Pipe Painting Operation – Large Line (K015)
  - c) The following annual operational restrictions are in place in PTI P0119009 to maintain compliance with the facility-wide emission limitations on HAPs for McWane Poles (0616015010):
    - (1) 2,190 gallons of coating (K022);
    - (2) 27,000 tons of poles (P902-P906);
    - (3) 19.5 tons of electrode (P907);
    - (4) 19.5 tons of electrode (P908);
    - (5) 180 tons of grit (P909);
    - (6) 6,000 hours of operation for Cartridge Filter A, controlling emissions units P902-P904, and P912;
    - (7) 6,000 hours of operation for Filter C, controlling emissions units P906 and P907;
    - (8) 6,000 hours of operation and 54,000 million Btu of natural gas at drying oven (R008);

(9) 108,000 gallons of coating and 250 gallons of cleanup material (R008).

d) In order to maintain compliance with the facility-wide emission limitations on HAPs, the facility, McWane Ductile – Ohio (0616010006), is limited to the following annual operational restrictions:

(1) 9,000 gallons of coating and 500 gallons of cleanup (K002);

(2) 14,000 gallons of coating and 250 gallons of cleanup (K024);

(3) 400 gallons of coating (K025);

(4) 4,000 tons of material blasted (P911);

#### 4. Facility-Wide Monitoring and/or Recordkeeping Requirements

a) The following information must be maintained each month for McWane Ductile - Ohio (0616010006):

(1) the quantity of metal melted, in tons;

(2) the rolling, 12-month summation of the quantity of metal melted, in tons; and

(3) the rolling, 12-month summation of the facility-wide individual HAP and facility-wide total combined HAP emissions, in tons;

(4) the throughput of coating and cleanup, in gallons, for each month (K002);

(5) beginning after the first 12 calendar months of operation, the rolling 12-month summation of the throughput of coating and cleanup, in gallons (K002)

(6) also during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of coating and cleanup, in gallons for each calendar month (K002);

(7) the throughput of coating and cleanup, in gallons, for each month (K024);

(8) beginning after the first 12 calendar months of operation, the rolling 12-month summation of the throughput of coating and cleanup, in gallons (K024)

(9) also during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of coating and cleanup, in gallons for each calendar month (K024);

(10) the throughput of coating, in gallons, for each month (K025);

(11) beginning after the first 12 calendar months of operation, the rolling 12-month summation of the throughput of coating, in gallons (K025)

(12) also during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of coating, in gallons for each calendar month (K025);

- (13) the throughput of material blasted, in tons, for each month (P911);
  - (14) beginning after the first 12 calendar months of operation, the rolling 12-month summation of the throughput of material blasted, in tons (P911);
  - (15) also during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of material blasted, in tons, for each calendar month (P911); and
  - (16) the facility-wide individual HAP and facility-wide total combined HAP emissions, in tons.
- b) As required by PTI P0116276 and PTI P0120074, the following information shall be collected and recorded each month for each of the HAP emitting emissions units located at McWane Ductile - Ohio (0616010006):
- (1) For any month that a material containing organic HAP is used:
    - a. the company identification for each HAP-containing coating and cleanup material employed during the month;
    - b. the number of gallons of each HAP-containing coating or cleanup material employed during the month;
    - c. the organic HAP content of each coating and cleanup material, in pounds per gallon; and
    - d. the total organic HAP emission rate for all coatings and cleanup materials, in tons.
  - (2) For any month that a material containing no organic HAP is used:
    - a. the company identification for each coating or cleanup material employed that contains no organic HAP employed during the month (a coating may be assumed to be employed during the month if it is purchased or released); and
    - b. the Material Safety Data Sheet or coating sheet for the coating or cleanup material identified in 4.b)(2)a.
- c) As required by PTI P0119009, the following information shall be recorded each month for McWane Poles (0616015010):
- (1) the throughput of coating and cleanup material usage, in gallons, for each month (K022);
  - (2) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of coating and cleanup material usage (K022);
  - (3) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of coating and cleanup material usage, for each calendar month (K022);
  - (4) the throughput of poles, in tons, for each month (P902-P906);

- (5) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of poles, in tons (P902-P906);
- (6) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of poles, in tons, for each calendar month (P902-P906);
- (7) the operating hours for Cartridge Filter A and Cartridge Filter C;
- (8) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the operating hours of Cartridge Filter A and Cartridge Filter C;
- (9) also, during the first 12 calendar months of operation, the permittee shall record the cumulative operating hours of Cartridge Filter A and Cartridge Filter C for each calendar month;
- (10) the throughput of electrode, in tons, for each month (P907 and P908);
- (11) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of electrode, in tons (P907 and P908);
- (12) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of electrode, in tons for each calendar month (P907 and P908);
- (13) the throughput of grit, in tons, for each month (P909);
- (14) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of grit, in tons (P909);
- (15) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of grit, in tons for each calendar month (P909);
- (16) the throughput of topcoat, in gallons, for each month (R008);
- (17) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of topcoat, in gallons (R008);
- (18) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of topcoat, in gallons, for each calendar month (R008);
- (19) the throughput of cleanup, in gallons for each month (R008);
- (20) beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput of cleanup, in gallons (R008);
- (21) also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput of cleanup, in gallons, for each calendar month (R008);
- (22) the maximum heat input of the drying oven, in million BTU, for each month (R008);
- (23) beginning after the first 12 calendar months of operation, the rolling 12-month summation of the maximum heat input of the drying oven, in million BTU (R008);

- (24) also during the first 12 calendar months of operation, the permittee shall record the cumulative maximum heat input of the drying oven, in million BTU, for each calendar month (R008); and,
- (25) the rolling, 12-month summation of the facility-wide individual HAP and facility-wide total combined HAP emissions, in tons.

d) The permittee shall maintain monthly records of the rolling, 12-month summation of the facility-wide, McWane Poles (0616015010) and McWane Ductile - Ohio (0616010006) combined, HAP and facility-wide total combined HAP emissions, in tons (Summation of 4.a)(4), 4.b)(1)d., and 4.c)(25)). The facility, McWane Ductile - Ohio (0616010006) combined with McWane Poles (0616015010), has sufficient records to begin calculating and tracking compliance with the rolling emissions limitations and operational restrictions upon issuance of this permit.

#### 5. Reporting Requirements

- a) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- b) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month summations of facility-wide individual HAP and facility-wide total combined HAP emissions limitations in 2.a). The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- c) The permittee shall notify the Ohio EPA, Southeast District Office of any monthly record showing an exceedance of the rolling, 12-month operational restrictions in 3.a) and 3.c) or any deviation from the no organic HAP coating restrictions specified in 3.b). A copy of such record shall be sent to the Ohio EPA, Southeast District Office within 30 days following the end of the calendar month.

#### 6. Testing Requirements

- a) Compliance with the facility-wide (i.e. McWane Ductile - Ohio (0616010006) and McWane Poles (0616015010) combined) individual HAP and total combined HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly emissions figures determined in accordance with the recordkeeping requirements in 4.a) and 4.b)(1)(d) for all HAP emitting emission units. Calculations shall follow the methodology presented in Attachment 2 of the amended permit-to-install application received on November 21, 2006, for McWane Ductile - Ohio (0616010006), and the methodology presented in the calculations attachment of the amended permit-to-install application received December 10, 2013, for McWane Poles (0616015010) and any subsequent revisions to that methodology approved by Ohio EPA.
- b) Compliance with the annual operational restrictions (throughputs, hours of operation, and input of the drying oven) shall be based upon a rolling, 12-month summation of the monthly usage figures determined in accordance with the recordkeeping requirements in 4.a) and 4.c).
- c) Compliance with the no organic HAP coatings restrictions shall be demonstrated based upon the recordkeeping requirements specified in 4.b).



**Final Permit-to-Install**  
McWane Ductile - Ohio  
**Permit Number:** P0120074  
**Facility ID:** 0616010006  
**Effective Date:**6/13/2016

7. The following emissions units contained in this permit are subject to the requirements of 40 CFR Part 63 Subpart 40 CFR 63 Subpart ZZZZZ – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries Area Sources: P913 and K027. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.



**Final Permit-to-Install**  
McWane Ductile - Ohio  
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**Effective Date:**6/13/2016

## **C. Emissions Unit Terms and Conditions**

**1. P913, Small Laempe Core Mixing and Making**

**Operations, Property and/or Equipment Description:**

- a) Small Laempe core mixing and making with maximum throughput of 1.5 tons per hour and 13,140 tons/yr. Mixing process vented to a bin vent w/ 100% capture and a control efficiency of 99.9%. Core making process is vented to a scrubber with 98% capture efficiency, 50% control efficiency for PE and a 99.97% control efficiency for VOC emissions.

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

- (1) b)(1)b., b)(1)g. and g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

|    | Applicable Rules/Requirements                     | Applicable Emissions Limitations/Control Measures  |
|----|---|--|
| a. | OAC rule 3745-31-05(A)(3)<br>June 30, 2008        | <p>Install a bin vent on the core mixing process that is designed to meet a control efficiency of 99.9% for particulate emissions (PE).</p> <p>Install a scrubber capture and control system on core making process that is designed to meet a capture efficiency of 98% and a control efficiency of 50% for PE.</p> <p>Install a scrubber capture and control system on core making process that is designed to meet a capture efficiency of 98% and a control efficiency of 99.97% for volatile organic compounds (VOC) emissions.</p> <p>See b)(2)a. below.</p> |
| b. | OAC rule 3745-31-05(A)(3)(a)(ii)<br>June 30, 2008 | <p>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and VOC emissions from this air contaminant source since the potential to emit is less than 10 tons/year.</p> <p>See b)(2)b. below.</p>   |

|    | Applicable Rules/Requirements  | Applicable Emissions Limitations/Control Measures  |
|----|--|--|
| c. | OAC rule 3745-17-07(A)   | Visible PE from any stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.   |
| d. | OAC rule 3745-17-07(B)   | Exempt.<br><br>See b)(2)c. below   |
| e. | OAC rule 3745-17-08(B)   | Exempt.<br><br>See b)(2)d. below.  |
| f. | OAC rule 3745-17-11 (Table 1)  | PE shall not exceed 5.38 pounds per hour.  |
| g. | OAC rule 3745-114-01   | Ohio Toxic Rule – See g)(1) below.   |
| h. | 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880 – 10906)<br><br>[In accordance with 40 CFR 63.10880 (a), this emissions unit is part of a mold/core making line as defined in 40 CFR 63.10906, at an existing large iron and steel foundry that is an area source of HAPs that commenced construction or reconstruction before September 17, 2007 with an annual metal melt production rate of 20,000 tons or greater.] | See c)(4), d)(7) and e)(7) below.  |
| j. | 40 CFR 63.1-15 (40 CFR 63.7760)  | Table 3 to Subpart ZZZZZ of 40 CFR Part 63 – Applicability of General Provisions to New and Existing Affected Sources Classified as Large Foundries shows which parts of the General Provisions in 40 CFR 63.1-15 apply. |

(2) Additional Terms and Conditions

- a. This BAT emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. This emissions unit is exempt from the visible particulate emission limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-

17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

- d. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) **Operational Restrictions**

- (1) The permittee shall install and operate a bin vent and a scrubber system for the control of PE whenever this emissions unit is in operation and shall maintain the scrubber system in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) The permittee shall install and operate a scrubber system for the control of VOC emissions whenever this emissions unit is in operation and shall maintain the scrubber system in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (3) In the event the bin vent or the scrubber system are not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device(s) shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (4) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart ZZZZZ, including the following sections:

|          |  |
|----------|--|
| 63.10886 | For each core making line, you must use a binder chemical formulation that does not use methanol as a specific ingredient of the catalyst formulation. This requirement does not apply to the resin portion of the binder system |
|----------|--|

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the bin vent and the scrubber system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (2) The permittee shall conduct periodic inspections of the bin vent and the scrubber system to determine whether they are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the bin vent and the scrubber system while the emissions unit is shut down and perform any needed maintenance and repair to ensure that they are operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the bin vent and the scrubber system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall maintain records that document any time periods when the bin vent and/or the scrubber system was not in service when the emissions unit was in operation, as well as, a record of all operations during which the bin vent and/or scrubber system was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (6) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack(s) serving this emissions unit. 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 location and 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 visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the

observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (7) The permittee shall comply with all the applicable monitoring and recordkeeping requirements under 40 CFR Part 63, Subpart ZZZZZ, including the following sections:

|                |   |
|----------------|---|
| 63.10899(b)(4) | Keep records to document use of any binder chemical formulation that does not contain methanol as a specific ingredient of the catalyst formulation for each core making line as required by 63.10886. These records must be the MSDS (provided it contains appropriate information), a certified product data sheet, or a manufacturer's hazardous air pollutant data sheet. |
| 63.10899(b)(5) | Keep records of the annual quantity and composition of each HAP-containing chemical binder used to make cores. These records must be copies of purchasing records, MSDS, or other documentation that provides information on the binder or coating materials used.  |

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the bin vent and/or the scrubber system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (3) The permittee shall submit semiannual written reports that identify:
- a. all days during which any visible PE were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible PE.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (4) The permittee shall comply with all the applicable reporting requirements under 40 CFR Part 63, Subpart ZZZZZ, including the following sections:

|             |  |
|-------------|--|
| 63.10899(c) | <p>Submit semiannual compliance reports according to the requirements in 63.10(e). The reports must include, at a minimum, the following information:</p> <p>(1) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective action(s) taken; and</p> <p>(3) Summary information on any deviation from the pollution prevention management practices in 63.10885 and 63.10886 and the operation and maintenance requirements in 63.10896 and the corrective action(s) taken;</p> |
| 63.10900(b) | <p>Submit the notification of compliance status required by §63.9(h) including a certification of compliance, signed by a responsible official, that states:</p> <p>“This facility complies with the no methanol requirement for the catalyst portion of each binder chemical formulation for a furfuryl alcohol warm box or core making line according to 63.10886.”</p>  |

f) Testing Requirements

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

a. Design Standards:

Install a bin vent on the core mixing process that is designed to meet a control efficiency of 99.9% for PE.

Install a scrubber capture and control system on core making process that is designed to meet a capture efficiency of 98% and a control efficiency of 50% for PE.

Applicable Compliance Method:

Compliance with the design standards may be demonstrated by the manufacturer’s guaranteed specifications.

b. Design Standards:

Install a scrubber capture and control system on core making process that is designed to meet a capture efficiency of 98% and a control efficiency of 99.97% for VOC emissions.

Applicable Compliance Method:

Compliance with the design standards may be demonstrated by the manufacturer's guaranteed specifications.

If required, VOC emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

c. Emissions Limitation:

PE shall not exceed 5.38 pounds per hour.

Applicable Compliance Method:

Compliance is demonstrated by the following calculation:

$$((\text{PE emissions factor for mixing}) * (\text{maximum hourly throughput in ton/hr}) * (100\% \text{ capture}) * (1 - \text{control efficiency of bin vent}) * (1 - \text{building settling factor})) + ((\text{PE emissions factor for core making}) * (\text{maximum hourly throughput}) * (\text{capture efficiency of scrubber}) * (1 - \text{control efficiency of scrubber for PE})) = 0.26 \text{ lb/hr}$$

Where:

PE emissions factor for mixing = 0.0021 lb PE/ton of throughput (AP-42 Table 11.12-2 (6/06))

Maximum hourly throughput = 1.5 tons/hour

Control efficiency of bin vent = 99.9% (as submitted by the permittee)

Building settling factor = 70% (as submitted by the permittee)

PE emissions factor for core making = 0.35 lb/ton of throughput (Ohio RACM Guide, Page 2-219, Table 2.7-1)

Maximum hourly throughput = 1.5 tons/hour

Capture efficiency of scrubber = 98% (as submitted by the permittee in application A0055004)

Control efficiency of scrubber for PE = 50% (as submitted by the permittee in application A0055004)

If required, PE shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

d. Emissions Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, visible PE shall be determined according to USEPA Method 9.

g) Miscellaneous Requirements

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

**2. K027, Small Laempe Core Wash**

**Operations, Property and/or Equipment Description:**

Small Laempe core wash with a maximum usage rate of 2.2 gallons/hr and a restricted annual throughput of 10,000 gallons. Controlled by a dry particulate filter system with a 95% capture efficiency and a 99.87% control efficiency.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) b)(1)c. below.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

|    | Applicable Rules/Requirements                                  | Applicable Emissions Limitations/Control Measures   |
|----|--|---|
| a. | OAC rule 3745-31-05(A)(3) and ORC 3704.03(T)                   | The emissions limitations established pursuant to this rule is equivalent to the emissions limitations established pursuant to OAC rule 3745-31-05(D) for volatile organic compound (VOC) emissions.  |
| b. | OAC rule 3745-31-05(A)(3) June 30, 2008                        | The emissions limitations established pursuant to this rule is equivalent to the emissions limitations established pursuant to OAC rule 3745-31-05(D) for particulate emissions (PE).<br><br>See b)(1)a. below.   |
| c. | OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008                 | The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the potential to emit is less than 10 tons per year taking into account the federally enforceable restriction in b)(1)d. and the requirements of OAC rule 3745-17-11(C) below.<br><br>See b)(2)b. below. |
| d. | OAC rule 3745-31-05(D)<br><br>(Synthetic minor to restrict the | VOC emissions shall not exceed 19.5 tons per rolling, 12-month period.  |

|    | Applicable Rules/Requirements  | Applicable Emissions Limitations/Control Measures  |
|----|--|--|
|    | Federally enforceable potential to emit to avoid a major PSD modification for VOC emissions)   | PE shall not exceed 0.94 ton per rolling, 12-month period.   |
| e. | OAC rule 3745-17-11(C)   | See c)(2)-(3), d)(2)-(6) and e)(1)a., below.   |
| f. | 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880 – 10906)<br><br>[In accordance with 40 CFR 63.10880 (a), this emissions unit is part of a mold/core making line as defined in 40 CFR 63.10906, at an existing large iron and steel foundry that is an area source of HAPs that commenced construction or reconstruction before September 17, 2007 with an annual metal melt production rate of 20,000 tons or greater.] | See c)(4), d)(7), and e)(3) below.   |
| g. | 40 CFR 63.1-15 (40 CFR 63.7760)  | Table 3 to Subpart ZZZZZ of 40 CFR Part 63 – Applicability of General Provisions to New and Existing Affected Sources Classified as Large Foundries shows which parts of the General Provisions in 40 CFR 63.1-15 apply. |

(2) Additional Terms and Conditions

- a. This BAT emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

- (1) The permittee has requested a federally enforceable limitation on the core wash throughput for the purposes of limiting potential-to-emit of VOC emissions in order to avoid a major PSD modification. Therefore, the maximum throughput rate of core wash shall not exceed 10,000 gallons per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the core wash usage levels specified in the following table:

|          |  |
|----------|--|
| Month(s) | Maximum Allowable Cumulative Core Wash Usage |
|----------|--|



|      |         |
|------|---------|
| 1    | 1,636.8 |
| 1-2  | 3,273.6 |
| 1-3  | 4,910.4 |
| 1-4  | 6,547.2 |
| 1-5  | 8184    |
| 1-6  | 9820.8  |
| 1-7  | 10,000  |
| 1-8  | 10,000  |
| 1-9  | 10,000  |
| 1-10 | 10,000  |
| 1-11 | 10,000  |
| 1-12 | 10,000  |

After the first 12 calendar months of operation, compliance with the core wash usage limitation shall be based upon a rolling, 12-month summation of core wash.

- (2) The permittee shall install and operate a dry particulate filter system for the control of PE whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (3) In the event the dry particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (4) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart ZZZZZ, including the following sections:

|          |  |
|----------|--|
| 63.10886 | For each core making line, you must use a binder chemical formulation that does not use methanol as a specific ingredient of the catalyst formulation. This requirement does not apply to the resin portion of the binder system |
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d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:

- a. the total throughput of core wash, in gallons;
  - b. during the first 12 calendar months of operation, the permittee shall record the cumulative core wash throughput, in gallons, for each calendar month;
  - c. beginning after the first 12 calendar months of operation, the permittee shall record the rolling, 12-month summation of the cumulative throughput of core wash, in gallons, for each calendar month;
  - d. the total VOC emissions, in tons;
  - e. the rolling, 12-month summation of VOC emissions, in tons;
  - f. the total PE, in tons; and
  - g. the rolling, 12-month summation of PE, in tons.
- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (3) The permittee shall conduct periodic inspections of the dry particulate filter system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter system while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be

made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (6) The permittee shall maintain records that document any time periods when the dry particulate filter system was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (7) The permittee shall comply with all the applicable monitoring and recordkeeping requirements under 40 CFR Part 63, Subpart ZZZZZ, including the following sections:

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| 63.10899(b)(4) | Keep records to document use of any binder chemical formulation that does not contain methanol as a specific ingredient of the catalyst formulation for each core making line as required by 63.10886. These records must be the MSDS (provided it contains appropriate information), a certified product data sheet, or a manufacturer's hazardous air pollutant data sheet. |
| 63.10899(b)(5) | Keep records of the annual quantity and composition of each HAP-containing chemical binder used to make cores. These records must be copies of purchasing records, MSDS, or other documentation that provides information on the binder or coating materials used.  |

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify
  - a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation;
  - b. during the first 12 calendar months of operation, any exceedance of the monthly core wash usage restrictions, as found in c)(1) above;
  - c. beginning after the first 12 calendar months of operation, any exceedance of the rolling, 12-month summation of the cumulative throughput of core wash, in gallons, for each calendar month; and
  - d. any exceedance of the rolling 12-month summation of VOC emissions, in tons.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (3) The permittee shall comply with all the applicable reporting requirements under 40 CFR Part 63, Subpart ZZZZZ, including the following sections:

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| 63.10899(c) | <p>Submit semiannual compliance reports according to the requirements in 63.10(e). The reports must include, at a minimum, the following information:</p> <p>(1) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective action(s) taken; and</p> <p>(3) Summary information on any deviation from the pollution prevention management practices in 63.10885 and 63.10886 and the operation and maintenance requirements in 63.10896 and the corrective action(s) taken;</p> |
| 63.10900(b) | <p>Submit the notification of compliance status required by §63.9(h) including a certification of compliance, signed by a responsible official, that states:</p> <p>“This facility complies with the no methanol requirement for the catalyst portion of each binder chemical formulation for a furfuryl alcohol warm box or core making line according to 63.10886.”</p>  |

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emissions Limitation:
- VOC emissions shall not exceed 19.5 tons per rolling, 12-month period.
- PE shall not exceed 0.94 ton per rolling, 12-month period.
- Applicable Compliance Method:
- Compliance shall be based on the recordkeeping in d)(1) of this permit.

g) Miscellaneous Requirements

- (1) None.