



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

6/22/2016

Certified Mail

RYAN BURKE
 OSCO Industries - Portsmouth Division
 Jct. Rt. 23 South & Rt. 52 East / West
 P.O. Box 1388
 Portsmouth, OH 45662-1388

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0773010001
 Permit Number: P0120560
 Permit Type: OAC Chapter 3745-31 Modification
 County: Scioto

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Portsmouth Times. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
 Permit Review/Development Section
 Ohio EPA, DAPC
 50 West Town Street, Suite 700
 P.O. Box 1049
 Columbus, Ohio 43216-1049

and Portsmouth City Health Dept., Air Pollution Unit
 605 Washington Street
 3rd Floor
 Portsmouth, OH 45662

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Portsmouth City Health Dept., Air Pollution Unit at (740)353-5156.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
 Portsmouth; Kentucky; West Virginia

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Chapter 31 modification to replace the mold making machine and the cooling line portion of the existing Disa #2 mold making and pouring and cooling line and to correct the capacity of the line from 10 tons per hour to 12 tons per hour.

3. Facility Emissions and Attainment Status:

Osco Industries, Portsmouth is a Title V facility classified as major for Particulate Matter. They are located in Scioto County which is designated as attainment for all criteria pollutants except for Particulate Matter less than 2.5 microns. OSCO has federally enforceable operational restrictions for several emission units to ensure they remain under major source thresholds and avoid being subject to 40 CFR Part 63, Subpart EEEEE.

4. Source Emissions:

This Chapter 31 modification is to replace the mold making machine and pouring portion of the existing Disa 2 mold making, pouring and cooling line (P013). Osco has demonstrated that the emissions increases due to the modification do not trigger major NSR/PSD by comparing the P013 actual emissions (CY 2014 and CY 2015) to the new potential emission rates which include the federally enforceable limitations on operating hours of 6,000 hours and an annual restriction of 36,000 tons metal poured.

5. Conclusion:

The terms and conditions of this permit which include federally enforceable operational limitations on the operating hours and an annual limitation on the tons of metal poured will ensure the modification of this emissions unit will not trigger Major NSR/ PSD for PM and CO.

6. Please provide additional notes or comments as necessary:

None



7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	0.34 fugitive
	25.11 stack EFDC
	25.11 stack CDC
	23.31 stack WDC
CO	43.56
VOC	2.52
NO _x	0.18
SO ₂	0.36

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install OAC Chapter 3745-31 Modification
OSCO Industries - Portsmouth Division

Jct. Rt. 23 South & Rt. 52 East / West, P.O. Box 1388, Portsmouth, OH 45662-1388

ID#: P0120560

Date of Action: 6/22/2016

Permit Desc: Chapter 31 modification of Disa #2 mold making, pouring and cooling line which includes replacement of mold making machine and cooling line and to correct the capacity of the line from 10 tons/hr to 12 tons/hr..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Cindy Charles, Portsmouth City Health Dept., Air Pollution Unit, 605 Washington Street 3rd Floor, Portsmouth, OH 45662. Ph: (740)353-5156



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
OSCO Industries - Portsmouth Division**

Facility ID:	0773010001
Permit Number:	P0120560
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	6/22/2016
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
OSCO Industries - Portsmouth Division

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Draft Permit-to-Install
OSCO Industries - Portsmouth Division
Permit Number: P0120560
Facility ID: 0773010001
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0773010001
Facility Description: Grey Iron Foundry
Application Number(s): A0055661
Permit Number: P0120560
Permit Description: Chapter 31 modification of Disa #2 mold making, pouring and cooling line which includes replacement of mold making machine and cooling line and to correct the capacity of the line from 10 tons/hr to 12 tons/hr.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$1,250.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 6/22/2016
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

OSCO Industries - Portsmouth Division
Jct. Rt. 23 South & Rt. 52 East / West
P.O. Box 1388
Portsmouth, OH 45662-1388

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:

Portsmouth City Health Dept., Air Pollution Unit
605 Washington Street
3rd Floor
Portsmouth, OH 45662
(740)353-5156

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



Draft Permit-to-Install
OSCO Industries - Portsmouth Division
Permit Number: P0120560
Facility ID: 0773010001

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0120560

Permit Description: Chapter 31 modification of Disa #2 mold making, pouring and cooling line which includes replacement of mold making machine and cooling line and to correct the capacity of the line from 10 tons/hr to 12 tons/hr.

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

Emissions Unit ID:	P013
Company Equipment ID:	Disa #2 Molding, Pouring and Cooling
Superseded Permit Number:	07-00509
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
OSCO Industries - Portsmouth Division
Permit Number: P0120560
Facility ID: 0773010001
Effective Date: To be entered upon final issuance

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 Portsmouth City Health Dept., Air Pollution Unit.

- (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 Portsmouth City Health Dept., Air Pollution Unit. The written 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. 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 Portsmouth City Health Dept., Air Pollution Unit 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 Portsmouth City Health Dept., Air Pollution Unit 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 Portsmouth City Health Dept., Air Pollution Unit 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 Portsmouth City Health Dept., Air Pollution Unit.
- 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 Portsmouth City Health Dept., Air Pollution Unit. 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.



Draft Permit-to-Install
OSCO Industries - Portsmouth Division
Permit Number: P0120560
Facility ID: 0773010001
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install
OSCO Industries - Portsmouth Division
Permit Number: P0120560
Facility ID: 0773010001

Effective Date: To be entered upon final issuance

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. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart ZZZZZ, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries Area Sources. At this time the Ohio EPA is not accepting the delegating authority to enforce NESHAP standards for area sources. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. 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.



Draft Permit-to-Install
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C. Emissions Unit Terms and Conditions



1. P013, Disa #2 Molding, Pouring and Cooling

Operations, Property and/or Equipment Description:

Disa #2 Mold making, pouring, and cooling line with a 12 ton/hr capacity with cooling controlled with the East Foundry Dust Collection (EFDC), Central Dust Collection (CDC), and West Dust Collection (WDC) baghouses and pouring controlled by the WDC baghouse.

Chapter 31 modification to replace the mold making machine and cooling line portion of Disa #2 and to correct the capacity of the line from 10 tons/hr to 12 tons/hr.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) [Synthetic minor to avoid major NSR and PSD applicability]	<u>Emission limitations for moldmaking operation:</u> Fugitive particulate matter (PM) emissions shall not exceed 0.22 ton per rolling, 12-month summation. Fugitive particulate matter less than 10 microns in diameter (PM ₁₀) shall not exceed 0.22 ton per rolling, 12-month summation. Fugitive particulate matter less than 2.5 microns in diameter (PM _{2.5}) shall not exceed 0.22 ton per rolling, 12-month summation. <u>Emission limitations for pouring and cooling operations:</u> Fugitive PM emissions shall not exceed 0.12 ton per rolling, 12-month summation. Fugitive PM ₁₀ emissions shall not exceed



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>0.11 ton per rolling, 12-month summation.</p> <p>Fugitive PM_{2.5} emissions shall not exceed 0.09 ton per rolling, 12-month summation.</p> <p>Carbon Monoxide (CO) emissions shall not exceed 43.56 tons per rolling, 12-month summation.</p> <p><u>Emission limitations for stack emissions:</u></p> <p>PM, PM₁₀ and PM_{2.5} emissions from the EFDC baghouse, of all emissions units vented to the baghouse, shall not exceed 25.11 tons per rolling, 12-month summation.</p> <p>PM, PM₁₀ and PM_{2.5} emissions from the CDC baghouse, of all emissions units vented to the baghouse, shall not exceed 25.11 tons per rolling, 12-month summation.</p> <p>PM, PM₁₀ and PM_{2.5} emissions from the WDC baghouse, of all emissions units vented to the baghouse, shall not exceed 23.31 tons per rolling, 12-month summation.</p> <p>See b)(2)b.</p> <p>See c)(1) and c)(2).</p>
b.	OAC rule 3745-31-05(D) June 30, 2008	<p><u>Emission limitations for pouring and cooling operations:</u></p> <p>Volatile organic compound (VOC) emissions shall not exceed 2.52 tons per rolling, 12-month summation.</p> <p>Nitrogen oxides (NO_x) emissions shall not exceed 0.18 tons per rolling, 12-month summation.</p> <p>Sulfur dioxide (SO₂) emissions shall not exceed 0.36 ton per rolling, 12-month summation.</p>



c.	ORC 3704.03(T)	The PM, PM ₁₀ , PM _{2.5} , and CO emission limitations are equivalent to the requirements of OAC rule 3745-31-05(D).
d.	OAC rule 3745-31-05(A)(3) June 30, 2008	The VOC, NO _x and SO ₂ emission limitations are equivalent to the requirements of OAC rule 3745-31-05(D), as effective June 30, 2008. See b)(2)d.
e.	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 VOC and NO _x emissions from this air contaminant source since the potential to emit is less than 10 tons/year taking into account the federally enforceable restrictions in b)(1)c below. See b)(2)e.
f.	OAC rule 3745-17-07(A)	Visible particulate emissions from the EFDC, CDC and WDC stacks shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
g.	OAC rule 3745-17-11(B)	Total particulate emissions from emissions units F001 and P013 combined (based on Figure II of OAC rule 3745-17-11) shall not exceed 11.7 pounds per hour.
h.	40 CFR Part 63, Subpart A	40 CFR Part 63, Subpart A, applicable to the General Provisions to Subpart A, identifies which parts of the General Provisions in 40 CFR 63.1-15 apply.
i.	40 CFR Part 63, Subpart ZZZZ [3.10895(e)]	If you own or operate a new or existing iron and steel foundry, you must not discharge to the atmosphere fugitive emissions from foundry operations that exhibit opacity greater than 20 percent (6-minute average), except for one 6-minute average per hour that does not exceed 30 percent. See b)(2)f.

(2) Additional Terms and Conditions

- a. The emissions from this emissions unit shall be vented to a baghouse at all times the emissions units are in operation.

- b. The baghouses (EDFC, CDC, and WDC) serving this emissions unit shall achieve an outlet concentration of 0.015 grain per dry standard cubic foot (gr/dscf) for PM, PM₁₀, and PM_{2.5}.

If any additional emissions units are vented to the EFDC, CDC, and/or the WDC baghouses, each dust collector's allowable emission rate shall remain at 0.015 grain per dry standard cubic foot of exhaust gases.

The following emissions unit vent to the EFDC: F001 (cooling), F003 (shakeout), F007 (transfer from cupola), P005, and P013 (cooling).

The following emission units vent to the CDC: F001 (pouring, cooling), F002 (pouring, cooling, shakeout), F007, and P013 (cooling).

The following emission units vent to the WDC: F002 (shakeout), P002, P013 (pouring, cooling) and P026 (shakeout).

The permittee reserves the right to direct the particulate emissions from any other existing or new emissions units (once permitted and thereby considered existing) to these fabric filters with the understanding that emissions will not exceed 0.015 grain per actual cubic foot of the total exhaust gases and/or individual emission unit's permitted allowable emission limitation.

This right is allowed as long as the permittee does not trigger the modification definition pursuant to Ohio Administrative Code (OAC) rule 3745-31-01 and submits information to the Ohio EPA within thirty days after the change(s) documenting the change(s). This information would include, but not limited to, the following: a description of which emissions units were redirected to which baghouse, and calculations supporting the permittee's contention that the redirection of existing emissions units would not trigger the modification definition pursuant to OAC rule 3745-31-01.

- c. The permittee shall use a capture hood with 99% capture efficiency.
- d. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- e. 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.
- f. The permittee shall comply with the applicable requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart ZZZZZ.



63.10895(e)	If you own or operate a new or existing iron and steel foundry, you must not discharge to the atmosphere fugitive emissions from foundry operations that exhibit opacity greater than 20 percent (6-minute average), except for one 6-minute average per hour that does not exceed 30 percent.
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c) Operational Restrictions

- (1) The maximum operating time for this emissions unit shall not exceed 6,000 hours per year based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation following modification of the emissions unit or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

<u>nth(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
-2	500
-3	1,000
-4	1,500
-5	2,000
-6	2,500
-7	3,000
-8	3,500
-9	4,000
-10	4,500
-11	5,000
-12	5,500
-12	6,000

After the first 12 calendar months of operation following modification of the emissions unit or the first 12 calendar months following the issuance of this permit, compliance with the annual operating hours limitations shall be based upon a rolling, 12-month summation of the operating hours.

- (2) The maximum production rate for this emissions unit shall not exceed 36,000 tons of metal poured per year based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation following modification of the emissions unit or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:



<u>nth(s)</u>	<u>Maximum Allowable Cumulative Production</u>
	3,000
-2	6,000
-3	9,000
-4	12,000
-5	15,000
-6	18,000
-7	21,000
-8	24,000
-9	27,000
-10	30,000
-11	33,000
-12	36,000

After the first 12 calendar months of operation following modification of the emissions unit or the first 12 calendar months following the issuance of this permit, compliance with the annual production rate limitations shall be based upon a rolling, 12-month summation of the production rates.

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

- (1) The permittee shall maintain monthly records of the following information for emissions units P013:
 - a. the total metal poured, in tons;
 - b. the operating hours for each month;
 - c. beginning after the first 12 calendar months of operation following modification of the emissions unit or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the total metal poured and the operating hours; and
 - d. the rolling, 12-month summation of PM, PM₁₀, PM_{2.5}, and CO emissions, in tons based on the calculation in f)(1)a.-b. below.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.

- (2) The pressure drop across the EFDC, WDC, and CDC baghouses shall be maintained within the range of 2 to 9 inches of water while the emissions units are in operation.
- (3) The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in

accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions units. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.



- (4) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the CDC, EFDC, and WDC stacks 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 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 emission 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.

- (5) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive 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. the total duration of any visible emission incident; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

- (6) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart ZZZZZ.

63.10899(a)	Recordkeeping
63.10898(i)	Monitoring

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 (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month summation of PM, PM₁₀, PM_{2.5} and CO emissions;
 - b. all exceedances of the rolling, 12-month limitation on the metal pouring rate and operating hours limitation for this emissions unit; and for the first 12 calendar months of operation or the first 12 calendar months following issuance of this permit; all exceedances of the maximum allowable cumulative metal pouring rate and operating hours limitation;
 - c. each period of time (start time and date, end time and date) when the pressure drop across the EFDC, CDC and WDC baghouses were outside of the acceptable range;
 - d. any period of time (start time and date, end time and date) when the emissions unit was in operation and the process emissions were not vented to the EFDC, CDC and WDC baghouses;
 - e. each incident in e)(2)c and/or e)(2)d above where a prompt investigation was not conducted;
 - f. each incident of deviation described in e)(2)c and/or e)(2)d above where a prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - g. each incident of deviation described in e)(2)c and/or e)(2)d above where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and recordkeeping requirements of this permit.

The permittee shall identify any exceedances of the limitations established in Sections c)(1) for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit.

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:
 - a. identify all days during which any visible particulate emissions were observed from the CDC, EFDC, or WDC baghouse stacks serving this emissions unit; and
 - b. describe any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Portsmouth local air agency by January 31 and July 31 of each year and cover the previous 6-month period.



- (4) The permittee shall submit semiannual written reports that:
 - a. identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e. building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted to the Portsmouth local air agency by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart ZZZZZ.

63.10899(c) & (d)	Reporting
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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. Emission Limitation:

Fugitive PM emissions from moldmaking operations shall not exceed 0.22 ton per rolling, 12-month summation.

Fugitive PM₁₀ emissions from moldmaking operations shall not exceed 0.22 ton per rolling, 12-month summation.

Fugitive PM_{2.5} emissions from moldmaking operations shall not exceed 0.22 ton per rolling, 12-month summation.

Applicable Compliance Method:

Monthly emissions shall be calculated using the following equation:

$$PM = PM_{10} = PM_{2.5} = (P) * (EF) * (\text{ton}/2,000 \text{ lbs})$$

where:

PM = PM emissions (monthly);

P = production rate (monthly amount of metal poured as determined in d)(1)a; and

EF = 0.04 lb PM/ton metal.



The emission factor was obtained from Ohio EPA RACM, Section 2.7, Iron Foundries, Table 2.7-1.

b. Emission Limitation:

Fugitive PM emissions from pouring and cooling operations shall not exceed 0.12 ton per rolling, 12-month summation.

Applicable Compliance Method:

Monthly emissions shall be calculated using the following equation:

$$PM = (P) * (EF) * (\text{ton} / 2,000 \text{ lbs}) * (1-0.99)$$

where:

PM = PM emissions (monthly);

P = production rate (monthly amount of metal poured as determined in d)(1)a;

EF = 0.64 lb PM/ton metal); and

99% = capture hood efficiency.

The emission factor of 0.64 lb PM/ton sand was obtained from a stack test at Quality Castings, Orville, OH performed on 01/18/1996.

c. Emission Limitation:

Fugitive PM₁₀ emissions from pouring and cooling operations shall not exceed 0.11 ton per rolling, 12-month summation.

Applicable Compliance Method:

Monthly emissions shall be calculated using the following equation:

$$PM_{10} = (P) * (EF) * (\text{ton} / 2,000 \text{ lbs}) * (1-0.99)$$

where:

PM₁₀ = PM₁₀ emissions (monthly);

P = production rate (monthly amount of metal poured as determined in d)(1)a;

EF = 0.59 lbs PM₁₀/ton metal); and

99% = capture hood efficiency.

The emission factor of 0.59 lb PM₁₀/ton sand was obtained from a stack test at Quality Castings, Orville, OH performed on 01/18/1996.

d. Emission Limitation:



Fugitive PM_{2.5} emissions from pouring and cooling operations shall not exceed 0.09 ton per rolling, 12-month summation.

Applicable Compliance Method:

Monthly emissions shall be calculated using the following equation:

$$PM_{2.5} = (P) * (EF) * (\text{ton} / 2,000 \text{ lbs}) * (1 - 0.99)$$

where:

PM_{2.5} = PM_{2.5} emissions (monthly);

P = production rate (monthly amount of metal poured as determined in d)(1)a;

EF = 0.52 lb PM_{2.5}/ton metal; and

99% = capture hood efficiency.

The emission factor of 0.52 lb PM_{2.5}/ton sand was obtained from a stack test at Quality Castings, Orville, OH performed on 01/18/1996.

e. Emission Limitation:

The baghouses (EDFC, CDC, and WDC) serving this emissions unit shall achieve an outlet concentration of 0.015 grain per dry standard cubic foot (gr/dscf) for PM, PM₁₀, and PM_{2.5}.

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and 40 CFR Part 51, Appendix M, Methods 201 and 202.

f. Emission Limitation:

PM, PM₁₀ and PM_{2.5} emissions from the EFDC baghouse, of all emissions units vented to the baghouse, shall not exceed 25.11 tons per rolling, 12-month summation.

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the particulate emission rate, 0.015 gr/dscf, times the maximum airflow from the baghouse (65,088 scf/m), times 60 minutes/hour, divided by 7,000 grains/pound, times the maximum potential operating schedule of 6,000 hours/year, and dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the gr/dscf limitation, compliance will also be shown with the annual limitation.

g. Emission Limitation:

PM, PM₁₀ and PM_{2.5} emissions from the CDC baghouse, of all emissions units vented to the baghouse, shall not exceed 25.11 tons per rolling, 12-month summation.

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the particulate emission rate, 0.015 gr/dscf, times the maximum airflow from the baghouse (65,088 scf/m), times 60 minutes/hour, divided by 7,000 grains/pound, times the maximum potential operating schedule of 6,000 hours/year, and dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the gr/dscf limitation, compliance will also be shown with the annual limitation.

h. Emission Limitation:

PM, PM₁₀ and PM_{2.5} emissions from the WDC baghouse, of all emissions units vented to the baghouse, shall not exceed 23.31 tons per rolling, 12-month summation.

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the particulate emission rate, 0.015 gr/dscf, times the maximum airflow from the baghouse (60,439 scf/m), times 60 minutes/hour, divided by 7,000 grains/pound, times the maximum potential operating schedule of 6,000 hours/year, and dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the gr/dscf limitation, compliance will also be shown with the annual limitation.

i. Emission Limitation:

VOC emissions from pouring and cooling operations shall not exceed 2.52 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the 0.19 pound/ton VOC emission factor by the actual iron poured, in tons/year, and dividing by 2,000 pounds/ton. The VOC emission factor was obtained from a Casting Emissions Reduction Program document titled "Foundry Process Emission Factors: Baseline Emissions from Automotive foundries in Mexico", dated 1/19/99.

j. Emission Limitation:

CO emissions from pouring and cooling operations shall not exceed 43.56 tons per rolling, 12-month summation.



Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the CO emission factor, in pounds/ton, times the actual iron poured, in tons/year, and dividing by 2,000 pounds/ton. The CO emission factor shall be calculated from the results of the most recent stack test which demonstrated compliance.

k. Emission Limitation:

NO_x emissions from pouring and cooling operations shall not exceed 0.18 ton per rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be calculated by multiplying the 0.01 pound/ton NO_x emission factor by the actual iron poured/cooled, in tons/year, and dividing by 2,000 pounds/ton. The NO_x emission factor for pouring/cooling was obtained from the FIRE database Version 6.23 (SCC 3-04-003-20).

l. Emission Limitation:

SO₂ emissions from pouring and cooling operations shall not exceed 0.36 ton per rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be calculated by multiplying the 0.02 pound/ton SO₂ emission factor by the actual iron poured/cooled, in tons/year. The SO₂ emission factor for pouring/cooling was obtained from the FIRE database Version 6.23 (SCC 3-04-003-20).

m. Emission Limitation:

Visible particulate emissions from the baghouse stacks serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

If you own or operate a new or existing iron and steel foundry, you must not discharge to the atmosphere fugitive emissions from foundry operations that exhibit opacity greater than 20 percent (6-minute average), except for one 6-minute average per hour that does not exceed 30 percent.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9, OAC rule 3745-17-03(B)(1) and section f)(3), as applicable.

(2) Emission Testing Requirements

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 6 months of issuance of the permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PM and PM₁₀.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

For PE: Methods 1 through 5 of 40 CFR Part 60, Appendix A; and for PM₁₀: Methods 1 through 4 and Methods 201 and 202, as codified at 40 CFR Part 60 Appendix A and 40 CFR Part 51, Appendix M, respectively.

Alternate U.S. EPA-approved test methods may be used with prior approval from the Portsmouth Local Air Agency.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Portsmouth Local Air Agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Portsmouth Local Air Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Portsmouth Local Air Agency's refusal to accept the results of the emission test(s).
- f. Personnel from the Portsmouth 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.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test and submitted to the Portsmouth Local Air Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Portsmouth Local Air Agency.



- (3) The permittee shall comply with the applicable performance test requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart ZZZZZ.

63.10898(h)	Opacity test for fugitive emissions
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g) Miscellaneous Requirements

- (1) None.