Ohio Environmental Protection Agency

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

6/30/2016

Certified Mail

| | |
|---|---|
| No | TOXIC REVIEW |
| No | PSD |
| No | 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 |

John Burke
OSCO Inc.-Jackson 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: 0640010009
Permit Number: P0119641
Permit Type: OAC Chapter 3745-31 Modification
County: Jackson

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 Times Journal. 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

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138

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 Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

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

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

# Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description:

   OSCO Inc. – Jackson Division (0640010009) is an existing grey iron foundry facility located in Jackson County, Ohio. On October 5, 2015, OSCO submitted an application requesting a Chapter 31 modification of emissions unit P909 – Wheelabrator #4 (formerly F014), installed in 2013, to increase the hours of operation to be consistent with the synthetic minor restrictions established for other sources controlled by the baghouse controlling this emissions unit.

3. Facility Emissions and Attainment Status:

   OSCO Inc. operates a grey iron foundry located in the City of Jackson, Jackson County, which is in attainment for all criteria pollutants. OSCO's Jackson Division is a major stationary source and is classified as an area source of HAPs subject to 40 CFR Part 63, Subpart ZZZZZ, as a large foundry. OSCO has existing synthetic minor restrictions in place for several emission units to ensure that the addition of equipment over time has not caused them to exceed the significance levels to be considered major modifications. OSCO also has an existing facility–wide synthetic minor restriction for the restriction of hazardous air pollutants to remain an area source of HAPs and to avoid the requirements of 40 CFR Part 63, Subpart EEEEE.

4. Source Emissions:

   The emissions unit included in this permitting action is a source of particulate emissions and HAPs. OSCO has requested the continuation of the facility-wide synthetic minor restrictions established for HAPs, and has requested synthetic minor restrictions be established to limit particulate emissions from this emissions unit. Federally enforceable restrictions on EU P909 will lower the increase in potential particulate emissions to less than 25 tons per year, $PM_{10}$ emissions to less than 15 tons per year, and $PM_{2.5}$ emissions remain less than 10 tons per year. The federally enforceable restrictions will also ensure HAP emissions remain less than 25 tons per year for combined HAPs and less than 10 tons per year for any single HAP facility-wide. These restrictions will keep the company an area source, as defined by 40 CFR Part 63.

5. Conclusion:

   The operational restrictions, emission limits, emissions testing, record keeping, and reporting requirements of this permit are sufficient to provide federally enforceable limitations on the potential to emit of particulate emissions from all sources at the facility, including P909, to below major modification thresholds and facility-wide HAP emissions to below major source HAP thresholds.

6. Please provide additional notes or comments as necessary:

   None

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

| Pollutant | Tons Per Year |
|---|---|
| PE | 5.40 |
| PM10/PM2.5 | 0.69 |
| Total HAP | 24.9 |
| Single HAP | 9.9 |

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 Inc.-Jackson Division
Athens & Chillicothe,P.O. Box 327, Jackson, OH 45640-0327
ID#:P0119641
Date of Action: 6/30/2016
Permit Desc:Chapter 31 modification of Wheelabrator #4 to increase the maximum hours of operation..
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: Katelyn Pontius, Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138. Ph: (740)385-8501

# DRAFT

# Division of Air Pollution Control
# Permit-to-Install
for
OSCO Inc.-Jackson Division

| | |
|---|---|
| Facility ID: | 0640010009 |
| Permit Number: | P0119641 |
| Permit Type: | OAC Chapter 3745-31 Modification |
| Issued: | 6/30/2016 |
| Effective: | To be entered upon final issuance |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Permit-to-Install**
for
OSCO Inc.-Jackson Division

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# Authorization

| | |
|---|---|
| Facility ID: | 0640010009 |
| Facility Description: | Gray Iron Foundry. |
| Application Number(s): | A0054237, A0055700 |
| Permit Number: | P0119641 |
| Permit Description: | Chapter 31 modification of Wheelabrator #4 to increase the maximum hours of operation. |
| Permit Type: | OAC Chapter 3745-31 Modification |
| Permit Fee: | $200.00*DO NOT send payment at this time, subject to change before final issuance* |
| Issue Date: | 6/30/2016 |
| Effective Date: | To be entered upon final issuance |

This document constitutes issuance to:

OSCO Inc.-Jackson Division
Athens & Chillicothe
P.O. Box 327
Jackson, OH 45640-0327

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

# Authorization (continued)

Permit Number: P0119641
Permit Description: Chapter 31 modification of Wheelabrator #4 to increase the maximum hours of operation.

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

| | |
|---|---|
| **Emissions Unit ID:** | **P909** |
| Company Equipment ID: | Wheelabrator #4 |
| Superseded Permit Number: | P0114226 |
| General Permit Category and Type: | Not Applicable |

# 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 emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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 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, andreportingrequirements 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 theOhio EPA DAPC, Southeast District Officein 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 theOhio 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 <u>obtained before</u>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 enteredupon 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. Emissions Limitations:

   a) 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 |
|---|---|---|
| (1) | OAC rule 3745-31-05(D)<br><br>(Restriction to remain an area source of HAP emissions to avoid the requirements of 40 CFR Part 63, Subpart EEEEE.) | The facility-wide individual hazardous air pollutant (HAP) emissions and the facility-wide total combined HAP emissions shall not exceed 9.9 and 24.9 tons per year, respectively, based upon rolling, 12-month summations of the HAP emission rates.<br><br>See b)(1) below. |

   b) Additional Terms and Conditions

      (1) The following emissions units (EUs) comprise the HAP emitting EUs being restricted at this facility:

F004 – Wheelabrator #2

F005 – Wheelabrator #3

F007 – Pouring Box #1

F008 – Pouring Box #2

F009 – Stand Grinders

P909 – Wheelabrator #4

P009 – Shell Sand Coating System

P903 – Cupola Melting

P907 – Shell Molding Machines

P908 – 9ft Rotary Cooling Drum and Shakeout

All remaining HAP emissions from other sources at the facility have a total potential to emit of less than 0.1 ton per year combined. Compliance with the facility-wide individual HAP and the facility-wide total combined HAP emissions limitations shall be based upon rolling, 12-month summations of the monthly usage/emissions figures. The permittee has sufficient records to begin calculating and tracking these rolling emissions limitations upon issuance of this permit.

3. Operational Restrictions

a) The following annual operational restrictions are in place in permit-to-install (PTI) P0119905, PTI P0119668 and PTI P0119641 to maintain facility-wide HAPs compliance:

(1) 60,840 tons of iron produced (EUs P903, P908, F004, F005, F009, P909);

(2) 30,420 tons of iron produced (EUs F007, F008);

(3) 4,680 hours of operation (P903, IAC and Wheelabrator Baghouse controlling EUs F007, F008, P908);

(4) 6,240 hours of operation ("Finishing Baghouse" controlling EUs F004, F005, F009, and P909);

(5) 42,588 tons of shell sand throughput (P907 and P009)

4. Monitoring and/or Recordkeeping Requirements

a) The permittee shall collect and record the following information each month:

(1) the throughput of iron produced (EUs P903, P908, F004, F005, F009, P909, F007, F008), in tons;

(2) the operating hours for the "Finishing Baghouse" (controlling EUs F004, F005, F009 and P909), the IAC and Wheelabrator Baghouse (controlling EUs F008, F008, and P908), and the cupola baghouse (controlling EU P903), in hours;

(3) the amount of shell sand processed (EUs P907 and P009), in tons;

(4) any occurrence when a controlled emissions unit operates without the use of its corresponding air pollution control device, including the date and duration of the occurrence;

(5) the facility-wide individual HAP and facility-wide total combined HAP emissions, in tons;

(6) the rolling, 12-month summation of the throughput of iron produced (EUs P903, P908, F004, F005, F009, P909, F007, F008), in tons;

(7) the rolling, 12-month summation of the operating hours for the "Finishing Baghouse" (controlling EUs F004, F005, F009 and P909), the IAC and Wheelabrator Baghouse (controlling EUs F008, F008, and P908), and the cupola baghouse (controlling EU P903), in hours;

(8) the rolling, 12-month summation of the amount of shell sand processed (EUs P907 and P009), in tons;

(9) the rolling, 12-month summations of facility-wide individual HAP emissions and facility-wide total combined HAP emissions, in tons.

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 following:

(1) the rolling, 12-month summation of the throughput of iron produced (EUs P903, P908, F004, F005, F009, P909, F007, F008);

(2) the rolling, 12-month summation of the operating hours for the “Finishing Baghouse” (controlling EUs F004, F005, F009 and P909), the IAC and Wheelabrator Baghouse (controlling EUs F008, F008, and P908), and the cupola baghouse (controlling EU P903);

(3) the rolling, 12-month summation of the amount of shell sand processed (EUs P907 and P009); and

(4) the rolling, 12-month summations of facility-wide individual HAP and facility-wide total combined HAP emissions.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

6. Testing Requirements

a) Compliance with the Emissions Limitations and/or Control Requirements specified in section 2. of these terms and conditions shall be determined in accordance with the following methods:

(1) Emissions Limitation:

The facility-wide individual HAP emissions and the facility-wide total combined HAP emissions shall not exceed 9.9 and 24.9 tons per year, respectively, based upon rolling, 12-month summations of the HAP emission rates.

Applicable Compliance Method:

Compliance with the facility-wide individual HAP and the facility-wide total combined HAP emissions limitations shall be based upon a rolling, 12-month summation of the monthly usage/emissions figures as required in 4.a) above.

7. Miscellaneous Requirements

a) None.

# C. Emissions Unit Terms and Conditions

## 1. P909, Wheelabrator #4

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

Formerly F014: 13 TPH (34 cf) Wheelabrator #4 shot blaster with a maximum annual throughput restriction of 60,840 tons and 6,240 hours of operation; vented to the "Finishing Baghouse" rated at 99.5% capture efficiency and 99% control efficiency and a building settling factor of 70% for fugitive PE; Chapter 31 modification to increase operating hours; Supersedes PTI P0114226, issued final 10/24/2013

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(A)(3) | Particulate emissions (PE) and emissions of particulate matter less than 10 microns in diameter ($PM_{10}$) and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$)from the baghouse stack serving EUs F004, F005, F009 and P909 shall not exceed 0.020 grain per dry standard cubic foot of exhaust gases.<br><br>No visible PE from the baghouse stack and no visible emissions of fugitive dust.<br><br>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.<br><br>See b)(2)a.-b. below.<br><br>The requirements of this rule also includes compliance with the requirements of OAC rules 3745-31-05(D) and 3745-31-05(F). |
| b. | OAC rule 3745-31-05(D)<br>(Synthetic Minor to avoid NSR major modification thresholds) | PE and emissions of $PM_{10}$ and $PM_{2.5}$ from the stack serving EUs F004, F005, F009 and P909, combined, shall not exceed |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | 14.45 tons per year as a rolling, 12-month summation.<br><br>Fugitive PE from EU P909 shall not exceed 0.71 ton per year, as a rolling, 12-month summation.<br><br>Fugitive emissions of $PM_{10}$ and $PM_{2.5}$ from EU P909 shall not exceed 0.08 ton per year, as a rolling, 12-month summation.<br><br>See c)(1)-(2) below.<br><br>See Section B.2.-6. for HAP restrictions. |
| c. | OAC rule 3745-17-07(B)(1)<br>OAC rule 3745-17-08<br>OAC rule 3745-17-07(A) | The emissions limitations established pursuant to this rule are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3). |

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures for the above-identified shot blasting operation for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee will maintain the building enclosures of the above-mentioned shot blasting operations, and will ensure that the cartridge filter baghouse ("Finishing Baghouse" controlling emission units F004, F005, F009, and P909) captures 99.5% of the emissions from the shot blasting operations. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. For each shot blasting operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the daily VE checks conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the shot blasting operation until further observation confirms that use of the control measure(s) is unnecessary.

c. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05(A)(3).

c) Operational Restrictions

(1) This emission unit shall be vented to a baghouse ("Finishing Baghouse") rated at 99.5% capture and 99% control efficiency and shall not exceed 0.020 grain per dry standard cubic foot of exhaust gases, when the emissions unit is in operation.

(2) The permittee has requested a federally enforceable restriction on the tons of metal processed and the annual operating hours for the "Finishing Baghouse" (controlling EUs F004, F005, F009, and P909) for purposes of limiting the potential to emit of PE/$PM_{10}$/$PM_{2.5}$ in order to avoid NSR major modification thresholds. See Section B.3.a)(1) and Section B.3.a)(4) for these restrictions.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records which list the following information:

a. the rolling 12-month summation of PE, $PM_{10}$, and $PM_{2.5}$ emissions;

b. See Section B.4.a)(1), B.4.a)(2), B.4.a)(7), and B.4.a)(8) above.

This emissions unit has been in operation for more than 12-months and, as such, the permittee has existing records to generate the rolling, 12-month summations of PE and emissions of $PM_{10}$, and $PM_{2.5}$, upon issuance of this permit.

(2) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible emissions of fugitive dust from the area immediately above the capture system serving this emissions unit and for any visible particulate emissions from the stack 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. the total duration of any visible emissions incident; and

c. any corrective actions taken to eliminate the visible emissions.

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 which identify the following;

a. all exceedances of the rolling, 12-month limitations on PE, $PM_{10}$, and $PM_{2.5}$ during the reporting period; and

b. See Section B.5.b)(1)-(2) above.

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 written semiannual reports that identify:

a. 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,

b. all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and

c. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

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:

PE and emissions of $PM_{10}$, and $PM_{2.5}$ from the baghouse stack serving EUs F004, F005, F009 and P909 shall not exceed 0.020 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

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.

b. Emissions Limitation:

No visible PE from the baghouse stack and no visible emissions of fugitive dust.

Applicable Compliance Method:

If required, visible PE shall be determined according to USEPA Method 22.

c. Emissions Limitation:

Fugitive PE from EU P909 shall not exceed 0.71 ton per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation:

(Uncontrolled hourly emissions factor)*(actual rolling, 12-month summation of the tons of metal processed in P909)*(1 - capture efficiency of baghouse)*(1 – control efficiency building)*(1 ton/ 2,000 lbs)

Where,

Uncontrolled hourly emissions factor = 15.50 lbs PE/ton of metal processed - Bernard S. Gutow Article, Modern Castings, January 1972

Actual rolling, 12-month summation of the tons of metal processed in P909 = as recorded in section B.4.a)(7)

Capture efficiency of baghouse = 99.5% as submitted in the permittee's application

Control efficiency of building = 70% as submitted in the permittee's application

The rolling, 12-month emissions limitation was established by the following calculation:

(15.50 lbs/ton) * (60,840 tons/rolling, 12-month summation) * (1 - 99.5% capture efficiency of baghouse) * (1 - 70% control efficiency of building) * (1 ton/2,000 lbs) = 0.71 ton/rolling, 12-month period

d. Emissions Limitation:

Fugitive emissions of $PM_{10}$ and $PM_{2.5}$ from EU P909 shall not exceed 0.08 ton per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation:

(Uncontrolled hourly emissions factor)*(actual rolling, 12-month summation of the tons of metal processed in P909)*(1 - capture efficiency of baghouse)*(1 – control efficiency of building)*(1 ton/ 2,000 lbs)

Where,

Uncontrolled hourly emissions factor = 1.7 lbs $PM_{10}$/$PM_{2.5}$ /ton of metal processed as submitted in the permittee's application

Actual rolling, 12-month summation of the tons of metal processed in P909 = as recorded in section B.4.a)(7)

Capture efficiency of baghouse = 99.5% as submitted in the permittee's application

Control efficiency of building = 70% as submitted in the permittee's application

The rolling, 12-month emissions limitation was established by the following calculation:

(1.7 lbs/ton) * (60,840 tons/rolling, 12-month summation) * (1 - 99.5% capture efficiency) * (1 - 70% control efficiency) * (1 ton/2,000 lbs) = 0.18 ton/rolling, 12-month period

e. Emissions Limitation:

PE and emissions of $PM_{10}$ and $PM_{2.5}$ from the stack serving EUs F004, F005, F009 and P909, combined, shall not exceed 14.45 tons per year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the most recent stack test hourly emission rate by the rolling, 12-month total hours of operation of the emissions unit (as recorded in Section B.4.a)(8)), and then dividing by 2,000 lbs/ton.

The annual emissions limitation was established by the following calculation:

0.020 gr/dscf * 27,000 cfm * 60 min/hr * (1 lb/7,000 gr) = 4.63 lbs/hr

4.63 lbs/hr * 6,240 hours/yr = 28,891.2 lbs/yr / 2,000 lbs/ton = 14.45 TPY

g) Miscellaneous Requirements

(1) None.