



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

7/18/2016

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: P0119668
 Permit Type: Administrative Modification
 County: Jackson

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

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

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 Administrative Modification

OSCO Inc.-Jackson Division

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

ID#: P0119668

Date of Action: 7/18/2016

Permit Desc: Agency-initiated administrative modification to correct/establish BAT for omitted pollutants. Administrative modification to maintain consistency with the calculation methodology and operating restrictions requested for F014. Company has requested draft issuance..

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

Permit Strategy Write-Up

1. Check all that apply:

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. This permit is an administrative modification of the following PTIs for the following reasons:

- PTI 06-4365 issued 8/9/1995 for F005 to update the calculation methodology and operational restrictions to match P909,
- PTI 06-1390, issued 6/26/1995, for F007 (Pouring and cooling box #1) and PTI 06-3368 issued 4/28/1993 for F008 (Pouring and cooling box #2) (grouped EUs) to establish BAT for SO₂, NO_x, VOC, and CO emissions and correct PE limits because it did not include fugitive emissions,
- PTI 06-858, issued 6/1/1982 for P009 (sand coating system) to establish BAT for PE and VOC emissions,
- PTI 06-08256 issued 4/19/2007 for P903 (cupola melting) to establish BAT and synthetic minor requirements for NO_x, VOC, and SO₂ emissions; BAT limits were established in accordance with OSCO's Consent Decree;
- PTI 06-06423 for P907 to establish BAT for VOC emissions which were previously omitted from the permit,
- PTI P0105982 issued 7/30/2010 to update the facility wide synthetic minor for HAP emissions to include P908 and to update BAT for P908 in accordance with the most recent guidance.

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 units included in this permitting action are a source of particulate emissions, VOC, SO₂, CO, NO_x, and HAP emissions. OSCO has requested the continuation of the facility-wide synthetic minor restrictions established for HAPs, the continuation of the synthetic minor for F005, P903 and P908 which were established to limit particulate emissions from these emissions unit. Federally enforceable restrictions on these emissions units will lower the increase in potential particulate

emissions to less than 25 tons per year, PM₁₀ 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 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):

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	97.66
PM ₁₀	112.29
PM _{2.5}	112.03
NO _x	24.55
SO ₂	9.0
CO	112.74
VOC	67.91
Single HAP	9.9
Total HAPs	24.9



DRAFT

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

Facility ID:	0640010009
Permit Number:	P0119668
Permit Type:	Administrative Modification
Issued:	7/18/2016
Effective:	To be entered upon final issuance



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

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Draft Permit-to-Install
OSCO Inc.-Jackson Division
Permit Number: P0119668
Facility ID: 0640010009

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0640010009

Facility Description: Gray Iron Foundry.

Application Number(s): M0002343, M0003575, M0003619, M0003629, M0003630, M0003631, M0003632, M0003633

Permit Number: P0119668

Permit Description: Agency-initiated administrative modification to correct/establish BAT for omitted pollutants. Administrative modification to maintain consistency with the calculation methodology and operating restrictions requested for F014. Company has requested draft issuance.

Permit Type: Administrative Modification

Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 7/18/2016

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: P0119668

Permit Description: Agency-initiated administrative modification to correct/establish BAT for omitted pollutants. Administrative modification to maintain consistency with the calculation methodology and operating restrictions requested for F014. Company has requested draft issuance.

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

- | | |
|-----------------------------------|------------------------|
| Emissions Unit ID: | F005 |
| Company Equipment ID: | Wheelabrator #3 |
| Superseded Permit Number: | 06-4365 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P009 |
| Company Equipment ID: | Sand Coating System |
| Superseded Permit Number: | 06-858 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P903 |
| Company Equipment ID: | Cupola Melting |
| Superseded Permit Number: | 06-08256 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P907 |
| Company Equipment ID: | Shell Molding Machines |
| Superseded Permit Number: | 06-06423 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P908 |
| Company Equipment ID: | P908 |
| Superseded Permit Number: | P0105982 |
| General Permit Category and Type: | Not Applicable |

Group Name: Pouring Boxes #1 and #2

Emissions Unit ID:	F007
Company Equipment ID:	Pouring Box #1
Superseded Permit Number:	06-1390
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F008
Company Equipment ID:	Pouring Box #2
Superseded Permit Number:	06-3368
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
OSCO Inc.-Jackson Division
Permit Number: P0119668
Facility ID: 0640010009
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 Ohio EPA DAPC, Southeast District Office.

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

5. **Scheduled Maintenance/Malfunction Reporting**

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

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

6. **Compliance Requirements**

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

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

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

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

7. **Best Available Technology**

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

10. Applicability

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

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

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

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

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

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

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

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

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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



Draft Permit-to-Install
OSCO Inc.-Jackson Division
Permit Number: P0119668
Facility ID: 0640010009
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



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. 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) (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. 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 Baghouse" and the "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 Baghouse" 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 Baghouse" 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.



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7. Miscellaneous Requirements

- a) The following emissions units contained in this permit are subject to the requirements of 40 CFR Part 63 Subpart 40 CFR 63 Subpart ZZZZZ – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries Area Sources: P009, P903, P907, and all fugitive emissions from foundry operations. 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.



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C. Emissions Unit Terms and Conditions

1. F005, Wheelabrator #3

Operations, Property and/or Equipment Description:

13 TPH (34 cf) Wheelabrator #3 shot blaster with a maximum annual throughput restriction of 60,840 tons and 6,240 hours of operation; vented to the "Finishing Baghouse" with 99.5% capture efficiency and 99% control efficiency; Administrative modification to align the terms and conditions with those of P909, Wheelabrator #4; Supersedes PTI 06-4365, issued final 8/9/1995

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)	<p>Particulate emissions (PE) and emissions of particulate matter less than 10 microns in diameter (PM₁₀) 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 or no visible PE from the baghouse stack.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>See b)(2)a.-c. below.</p> <p>The requirements of this rule also includes compliance with the requirements of OAC rules 3745-31-05(D), 3745-31-05(F), 3745-17-07(B) and 3745-17-08.</p>
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid NSR major modification thresholds)	PE, and emissions of PM ₁₀ and PM _{2.5} emissions from any stack serving EUs F004, F005, F009 and P909, combined, shall not exceed 14.45 tons per year, as a rolling, 12-month summation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Fugitive PE from EU P909 shall not exceed 0.71 ton per year, as a rolling, 12-month summation.</p> <p>Fugitive emissions of PM₁₀ and PM_{2.5} from EU P909 shall not exceed 0.08 ton per year, as a rolling, 12-month summation.</p> <p>See c)(1)-(2) below.</p> <p>See Section B.2.-6. for HAP restrictions.</p>
c.	OAC rule 3745-17-07(B)(1)	Visible PE of fugitive dust shall not exceed 20% opacity, as a 3-minute average.
d.	OAC rule 3745-17-08 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 operations 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/PM₁₀/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, PM₁₀, and PM_{2.5} emissions; and
 - 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 PM₁₀, and PM_{2.5}, upon issuance of this permit.

- (2) The permittee shall perform daily 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. 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 emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission 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.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, 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 emission 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 limitation on PE, PM₁₀, 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.

Applicable Compliance Method:

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

c. Emissions Limitation:

Fugitive PE from EU F005 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:

$(\text{Uncontrolled hourly emissions factor}) \times (\text{actual rolling, 12-month summation of the tons of metal processed in F005}) \times (1 - \text{capture efficiency of baghouse}) \times (1 - \text{control efficiency building}) \times (1 \text{ ton} / 2,000 \text{ lbs})$

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 F005 = as recorded in section B.4.a)(7)

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



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

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

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

d. Emissions Limitation:

Fugitive emissions of PM₁₀ and PM_{2.5} from EU F005 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:

$$(\text{Uncontrolled hourly emissions factor}) * (\text{actual rolling, 12-month summation of the tons of metal processed in F005}) * (1 - \text{capture efficiency of baghouse}) * (1 - \text{control efficiency of building}) * (1 \text{ ton}/2,000 \text{ lbs})$$

Where,

Uncontrolled hourly emissions factor = 1.7 lbs PM₁₀/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 F005 = 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:

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

e. Emissions Limitation:

PE and emissions of PM₁₀ 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:

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

$$4.63 \text{ lbs/hr} * 6,240 \text{ hours/yr} = 28,891.2 \text{ lbs/yr} / 2,000 \text{ lbs/ton} = 14.45 \text{ TPY}$$

f. Emissions Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

2. P009, Sand Coating System

Operations, Property and/or Equipment Description:

Sand coating system with a maximum hourly throughput of 8.12 tonsand restricted to 42,588 tons per rolling, 12-month period; controlled by “Shell Coating Baghouse” with 99% capture efficiency and 99% control efficiency; Administrative modification of PTI 06-858 issued 6/1/1982 to establish BAT limits for PE and VOC emissions.

- 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)	<p>Volatile organic compound (VOC) emissions shall not exceed 2.58 pounds per hour and 6.77 tons per year.</p> <p>Particulate emissions (PE) shall not exceed 1.32 pounds per hour 5.27 tons per year.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>The requirements of this rule also includes compliance with the requirements of OAC rules 3745-17-07(A), OAC rule 3745-17-07(B) and the requirements of OAC rule 3745-31-05(D) as found in Section B.2.-6. above.</p> <p>See b)(2)a.-c. below.</p>
b.	OAC rule 3745-17-07(A)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average.
c.	OAC rule 3745-17-07(B)(1)	Visible PE of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08	The emissions limitation established pursuant to this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880 – 10906) [In accordance with 40 CFR 63.10880 (a), this emissions unit is part of a mold/core making line as defined in 40 CFR 63.10906, at an existing large iron and steel foundry that is an area source of HAPs that commenced construction or reconstruction before September 17, 2007 with an annual metal melt production rate of 20,000 tons or greater.]	See c)(1) and d)(2) below.
f.	40 CFR 63.1-15 (40 CFR 63.7760)	Table 3 to Subpart ZZZZZ of 40 CFR Part 63 – Applicability of General Provisions to New and Existing Affected Sources Classified as Large Foundries shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control measures for the above-identified sand coating 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 sand coating operations, and will ensure that the “Shell Coating Baghouse” captures 99% of the emissions from the sand coating operations. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- b. For each sand coating 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 material handling operations 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) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart ZZZZZ, including the following sections:

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

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit and 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. 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 emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission 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.

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

63.10889(b)(4)	Keep records to document use of any binder chemical formulation that does not contain methanol as a specific ingredient of the catalyst formulation for each furfuryl alcohol warm box mold or core making line as required by 63.10886. These records must be the MSDS (provided it contains appropriate information), a certified product data sheet, or a manufacturer's hazardous air pollutant data sheet.
63.10889(b)(5)	Keep records of the annual quantity and composition of each HAP-containing chemical binder or coating material used to make molds and cores. These records must be copies of purchasing records, MSDS, or other documentation that provides information on the binder or coating materials used.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit 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.

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

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

f) Testing Requirements

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

a. Emissions Limitation:

VOC emissions shall not exceed 2.58 pounds per hour and 6.77 tons per year.

Applicable Compliance Method:

The hourly emissions limitation was established by the following equation:

$$(0.318 \text{ lb VOC/ton (Assumes VOC equals total HAPs)}) \times (8.12 \text{ tons/hour})$$

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

Compliance with this emissions limitation may be demonstrated by the following calculation:

$$(0.318 \text{ lb VOC/ton (Assumes VOC equals total HAPs)}) \times (42,588 \text{ tons of sand coated/year}) \times (1 \text{ ton}/2,000 \text{ lbs})$$

b. Emissions Limitation:

PE shall not exceed 1.32 pounds per hour and 5.27 tons per year.



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Applicable Compliance Method:

The hourly emissions limitation was established in accordance with the following equation:

$$[(3.60 \text{ lb PE/ton (FIRE Version 6.25 SCC 3-04-003-50)}) \times (8.12 \text{ tons of sand coated/hour}) \times (1 - 0.99 \text{ (capture efficiency)})] + [(0.015 \text{ gr/dscf (outlet of baghouse as submitted by permittee's application)}) \times (8,000 \text{ acfm}) \times (60 \text{ min/hour}) / (7,000 \text{ gr/lb})] = 1.32 \text{ pounds per hour}$$

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.

Compliance with the annual emissions limitation shall be demonstrated by the following calculation:

$$[(3.60 \text{ lb PE/ton (FIRE Version 6.25 SCC 3-04-003-50)}) \times (42,588 \text{ tons of sand coated/year}) \times (1 - 0.99 \text{ (capture efficiency)})] + [(0.015 \text{ gr/dscf (outlet of baghouse as submitted by permittee's application)}) \times (8,000 \text{ acfm}) \times (60 \text{ min/hour}) \times (8,760 \text{ hours/year}) / (7,000 \text{ gr/lb})] / 2,000 \text{ lbs/ton} = 5.27 \text{ tons per year}$$

c. Emissions Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

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

d. Emissions Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

3. **P903, Cupola Melting**

Operations, Property and/or Equipment Description:

13 TPH Cupola melting furnace with a throughput restriction of 60,840 tons per rolling, 12-month period; controlled by stack burners with 99% capture efficiency and 99% control efficiency for CO, OC and VOC emissions and controlled by a baghouse with 99% capture efficiency and 99% control efficiency for PE, PM₁₀ and PM_{2.5}; This emissions unit also has an hours of operation restriction of 4,680 hours per year; Administrative modification of PTI 06-08256 issued 4/19/2007 to update/correct BAT and synthetic minor requirements for fugitive PE, NO_x, VOC, and SO₂ emissions.

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)	<p>Particulate emissions (PE) from the baghouse stack serving this emissions unit shall not exceed 0.07 gr/dscf.</p> <p>Emissions of particulate matter less than 10 microns in diameter (PM₁₀) and emissions of particulate matter less than 2.5 microns in diameter (PM_{2.5}) from the baghouse stack serving this emissions unit shall not exceed 0.118 gr/dscf.</p> <p>Carbon monoxide (CO) emissions from the baghouse stack serving this emissions unit shall not exceed 2.5 lbs per ton of iron.</p> <p>Nitrogen oxide (NO_x) emissions from the baghouse stack serving this emissions unit shall not exceed 0.45 lb per ton of iron.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>emissions of fugitive dust.</p> <p>See b)(2)c. – f. below.</p> <p>The requirements of this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).</p>
b.	<p>OAC rule 3745-31-05(A)(3) As effective November 30, 2001</p>	<p>Volatile organic compound (VOC) emissions from the baghouse stack shall not exceed 0.18 lb per ton of iron.</p> <p>Sulfur dioxide (SO₂) emissions shall not exceed 0.072 lb per ton of iron.</p> <p>See b)(2)a. below.</p> <p>The requirements of this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).</p>
c.	<p>OAC rule 3745-31-05(A)(3)(b) As effective December 1, 2006</p>	<p>See b)(2)b. below.</p>
d.	<p>OAC rule 3745-31-05(D)</p> <p>Synthetic minor restriction to avoid PSD requirements</p>	<p>PE shall not exceed 23.00 tons per rolling, 12-month period.</p> <p>PM₁₀/PM_{2.5} emissions shall not exceed 38.44 tons per rolling, 12-month period.</p> <p>CO emissions shall not exceed 76.13 tons per rolling, 12-month period.</p> <p>NO_x emissions shall not exceed 13.69 tons per rolling, 12-month period.</p> <p>VOC emissions shall not exceed 5.48 tons per rolling, 12-month period.</p> <p>SO₂ emissions shall not exceed 2.18 tons per rolling, 12-month period.</p> <p>See Section B.2.-6. above for HAP restrictions.</p>
e.	<p>OAC rule 3745-17-07(A)</p>	<p>Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average.</p>
f.	<p>OAC rule 3745-17-07(B)(1)</p>	<p>Visible PE of fugitive dust shall not exceed 20% opacity, as a 3-minute average.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	OAC rule 3745-17-08 OAC rule 3745-18-06(E)(2)	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).
h.	40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880 – 10906) [In accordance with 40 CFR 63.10880 (a), this emissions unit is a metal melting furnace at an existing large iron and steel foundry that is an area source of HAPs that commenced construction or reconstruction before September 17, 2007 with an annual metal melt production rate of 20,000 tons or greater.]	You must not discharge to the atmosphere emissions from any metal melting furnace that exceed 0.8 pounds of particulate matter (PM) per ton of metal charged or 0.06 pounds of total metal HAP per ton of metal charged for an existing iron and steel foundry. (63.10895(c)(1)) 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. (63.10895(e)) See b)(2)g. and c)(2) below.
i.	40 CFR 63.1-15 (40 CFR 63.7760)	Table 3 to Subpart ZZZZZ of 40 CFR Part 63 – Applicability of General Provisions to New and Existing Affected Sources Classified as Large Foundries shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 20, 2001, in this permit. On December 30, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC paragraph 3745-31-05as part of the Ohio SIP:

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate of VOC emissions is less than ten tons per year taking into account the federally enforceable rule limit of 60,840 tons of molten metal/year under OAC rule 3745-31-05(D).

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO₂ emissions from this air contaminant source since the uncontrolled potential to emit for SO₂ emissions is less than ten tons per year.

- c. The permittee shall employ best available control measures for the above-identified cupola 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 cupola operations, and will ensure that stack burners and baghouse captures 99% of the emissions from the cupola operations. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The permittee shall ensure the ventilation rate for the control system shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the charge door.
- e. 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).
- f. CO gases generated during the operation of this emissions unit shall be combusted such that the 3-hour average combustion zone temperature does not fall below 1,300 degrees Fahrenheit for 0.3 second or greater in a direct-flame afterburner, oxidizer or equivalent device equipped with an indicating pyrometer which is positioned in the working area at the operator's eye level. Periods when the cupola is off blast, and for 15 minutes after going on blast from an off blast condition, are not included in the 3-hour average.
- g. The permittee shall comply with the additional applicable requirements under 40 CFR Part 63, Subpart ZZZZZ, including the following sections:

63.10880(f)	Initial applicability determination requirements.
63.10881(a)(2)	Comply with the pollution prevention management practices for metallic scrap in 63.1085(a) and binder formulations in 63.10886 by 1/2/2009.
63.10881(a)(2)	Comply with the pollution prevention management practices for mercury in 63.10885(b) by 1/4/2010
63.10881(a)(3)	Comply with the standards and management practices in 63.10895 not later than 2 years after date of your large foundry's notification of the initial determination



	required in 63.10880(f).
63.10881(d)(2)	Following the initial determination for an existing affected source required in 63.10880(f), comply with large foundry for at least 3 years before able to reclassify as a small foundry even if annual metal melt production falls below 20,000 tons. After 3 years you may reclassify your facility as a small foundry provided your annual metal melt production for the preceding calendar year was 20,000 tons or less.

c) Operational Restrictions

- (1) The permittee has requested a federally enforceable restriction on the tons of metal processed and the annual operating hours of this emissions unit for purposes of limiting the potential to emit of PE/PM₁₀/PM_{2.5} in order to avoid NSR major modification thresholds. See Section B.3.a)(1) and Section B.3.a)(3) for these restrictions.
- (2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart ZZZZZ, including the following sections:

63.10895(a)	Comply with the pollution prevention management practices in 63.10885 and 63.10886 and the applicable requirements of 63.10895(b)-(e).
63.10895(b)	Operate a capture and collection system for each metal melting furnace that meets the accepted engineering standards, such as those published by ACGIH.
63.10896(a)	Operate at all times according to O&M plan for each control device subject to PM, metal HAP, or opacity emissions limit in 63.10895.
63.10898(l)	You may change the operating limits for a baghouse if you meet the following requirements: (1) Submit a written notification of your plan to conduct a new performance test to revise the operating limit; (2) Conduct a performance test to demonstrate compliance with the applicable emissions limitation in 63.10895(c); and (3) Establish revised operating limits according to the applicable procedures in Table 2 to this subpart.

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

- (1) The permittee shall properly operate and maintain equipment to monitor the hours of operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the total PE, PM₁₀, PM_{2.5}, CO, NO_x, VOC, and SO₂ emissions in tons;
 - b. the rolling, 12-month summation of the PE, PM₁₀, PM_{2.5}, CO, NO_x, VOC, and SO₂ in tons; and
 - c. 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, PM₁₀, PM_{2.5}, CO, NO_x, VOC and SO₂ emissions upon issuance of this permit.

- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on 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.

In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 2.0 to 10.0 inches of water.

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 the appropriate Ohio EPA District Office or local air agency. 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 unit(s). 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 operate and maintain a continuous temperature monitor and recorder which measures and records the combustion zone temperature of the afterburner when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated (or replaced, as appropriate), operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall inspect and clean the burners of the afterburner at least once per year to ensure proper fuel mixing and efficient combustion and record each annual inspection and any related maintenance activity.

The permittee shall maintain daily records, when the emissions unit is in operation, of all 3-hour blocks of time during which the average temperature of the afterburner was less than 1,300 degrees Fahrenheit measured in the combustion zone. The permittee shall install an alarm device that alerts the permittee when the temperature measured in the combustion zone falls below the specified limitation and maintain a record of each such event.

- (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, building doors, roof monitors, charge doors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

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

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

63.10885(a)	Metallic scrap management program: For each segregated metallic scrap storage area, bin or pile, comply with the materials acquisition requirements in paragraph 63.10885(a)(1) or (2). Keep a copy of the material specifications onsite and readily available to all personnel with material acquisition duties and provide a copy to each of your scrap providers. You may have certain scrap subject to paragraph (a)(1) and other scrap subject to paragraph (a)(2) at your facility provided the metallic scrap remains segregated until charge make-up.
63.10885(a)(1)	Restricted metallic scrap: Prepare and operate at all times according to written material specifications of the purchase and use of only metal ingots, pig iron, slitter, or other materials that do not include post-consumer automotive body scrap, post-consumer engine blocks, post-consumer oil filters, oily turnings, lead components, chlorinated plastics, or free liquids. The requirements for no free liquids do not apply if the owner or operator can demonstrate that the free liquid is water that resulted from scrap exposure to rain.

63.10885(a)(2)	<p>General iron and steel scrap: Prepare and operate at all times according to written material specifications for the purchase and use of only iron and steel scrap that has been depleted (to the extent practicable) of organics and HAP metals in the charge materials used by the iron and steel foundry. The materials specifications must include at minimum the following information:</p> <p>(ii) For scrap charged to a cupola metal melting furnace that is equipped with an afterburner, specifications for metallic scrap materials to be depleted (to the extent practicable) of the presence of chlorinated plastics, accessible lead-containing components (such as batteries and wheel weights), and a program to ensure the scrap materials are drained of free liquids.</p>
63.10885(b)	<p>Mercury requirements: For scrap containing motor vehicle scrap, procure the scrap pursuant to the following for each scrap provider, contract, or shipment:</p> <p>(3) Option for specialty metal scrap: Maintain records of documentation that the only materials from motor vehicles in the scrap are materials recovered for their specialty alloy content and based on the nature of the scrap and purchase specifications that the type of scrap is not reasonably expected to contain mercury switches.</p> <p>For scrap that does not contain motor vehicle scrap procure the scrap pursuant the following for each scrap provider, contract, or shipment:</p> <p>(4) Scrap that does not contain motor vehicle scrap: For scrap not subject to the requirements in 63.10885(b)(1) - (3), maintain records of documentation that this scrap does not contain motor vehicle scrap.</p> <p>You may have one scrap provider, contract, or shipment subject to one compliance provision and others subject to another compliance provision.</p>
63.10896(a)	<p>Prepare and maintain a copy of O&M plan at the facility and make available upon request for review. At a minimum, the O&M plan must contain:</p> <p>(1) General facility and contact information;</p> <p>(2) Positions responsible for inspecting, maintaining, and repairing emissions control devices which are used to comply with this subpart;</p>

	<p>(3) Description of items, equipment, and conditions that will be inspected, including an inspection schedule for the items, equipment, and conditions; and</p> <p>(4) Identity and estimated quantity of the replacement parts that will be maintained in inventory.</p>
63.10896(b)	You may use an O&M, preventative maintenance or plan similar to O&M to address requirements 63.10896(a)(1) - (5) to demonstrate compliance with the requirements for an O&M plan.
63.10897(a)	<p>Conduct an initial inspection of each PM control device for a metal melting furnace no later than 60 days after the applicable compliance date for each installed control device which has been operated within 60 days of the compliance date.</p> <p>Following the initial inspections, perform periodic inspections and maintenance of each PM control device for a metal melting furnace at an existing affected source.</p> <p>Perform the initial and periodic inspections according to the requirements in 63.10897(a)(1)-(4). Record the results of each initial and periodic inspection and any maintenance action in the logbook required in 63.10899(b)(13).</p>
63.10897(a)(1)	<p>For the initial inspection of each baghouse, visually inspect the system ductwork and baghouse units for leaks. Inspect the inside of each baghouse for structural integrity and fabric filter condition. Following the initial inspections, inspect and maintain each baghouse according to the following requirements:</p> <p>(i) Conduct monthly visual inspections of the system ductwork for leaks; and</p> <p>(ii) Conduct inspections of the interior of baghouse for structural integrity and to determine the condition of fabric filter every 6 months.</p>
63.10897(e)	Make monthly inspections of equipment that is important to performance of the total capture system (i.e., pressure sensors, dampers, and damper switches). This inspection must include observations of the physical appearance of the equipment (e.g., presence of holes in the ductwork or hoods, flow constrictions caused by dents or accumulated dust in the ductwork, and fan erosion). Repair any defect or deficiency in the capture system as soon as practicable, but no later than 90 days. Record the date and the results of each inspection and

	date of repair of any defect or deficiency.
63.10897(g)	In event of an exceedance of an established emission limitation, including an operating limit, restore operations of the emissions source, including the control device and associated capture system to its normal or usual manner or operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown, or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the exceedance. Record the date and time corrective action was initiated, the corrective action taken, and the date corrective action was completed.
63.10899(a)	Maintain records for 5 years; most recent 2 years on site.
63.10899(b)(1)	Keep records of your written materials specifications according to 63.10885(a) and records that demonstrate compliance with the requirements for restricted metallic scrap in 63.10885(a)(1) and for the use of general scrap in 63.10885(a)(2) and for mercury in 63.10885(b)(3). Keep records documenting compliance with 63.10885(b)(4) for scrap that does not contain motor vehicle scrap.
63.10899(b)(6)	Keep records of monthly metal melt production for each calendar year.
63.10899(b)(7)	Keep record of the O&M plan as required by 63.10896(a) and records that demonstrate compliance with the plan requirements.
63.10899(b)(10)	Keep records of capture system inspections and repairs as required by 63.10897(e).
63.10899(b)(12)	Keep records of corrective action(s) for exceedances and excursions as required by 63.10897(g).
63.10899(b)(13)	Record the results of each inspection and maintenance required by 63.10897(a) for PM control devices in a logbook. Keep the logbook available upon request.
63.10899(b)(13)(i)	Keep records in the logbook of the date and time of each recorded action for a fabric filter, the results of each inspection, and the results of any maintenance performed on the bag filters.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following for this emissions unit:
 - a. all periods of time during which the recorded baghouse pressure drop was outside of the range specified above;
 - b. all 3-hour periods of time during which the afterburner combustion zone temperature was below the minimum temperature value specified above;
 - c. any exceedance of the rolling, 12-month emissions limitations for PE, PM₁₀, PM_{2.5}, CO, NO_x, VOC, or SO₂ specified above; and
 - d. 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.

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

63.10885(3)	Option for specialty metal scrap: Certify in your notification of compliance status that the only materials from motor vehicles in the scrap are materials recovered for their specialty alloy content and based on the nature of the scrap and purchase specifications, that the type of scrap is not reasonably expected to contain mercury switches.
63.10885(4)	Scrap that does not contain motor vehicle scrap: For scrap not subject to the requirements in paragraphs (b)(1) through (3) of this section, certify in your notification of compliance status that

	this scrap does not contain motor vehicle scrap.
63.10880(f)	Submit a written notification of the initial applicability that identifies your area source as a small or large foundry no later than January 2, 2009.
63.10881(d)(2)	If you reclassify your large foundry as a small foundry, submit a notification of reclassification within 30 days and comply with the requirements for a small foundry no later than the date of your notification of the reclassification. If the annual metal melt production exceeds 20,000 tons during a subsequent year, submit a notification or reclassification within 30 days and comply with the requirements for a large foundry no later than the date of your notification of the reclassification.
63.10899(c)	Submit semiannual compliance reports according to the requirements in 63.10(e). The reports must include, at a minimum, the following information: (1) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective action(s) taken; (3) Summary information on any deviation from the pollution prevention management practices in 63.10885 and 63.10886 and the operation and maintenance requirements in 63.10896 and the corrective action(s) taken.
63.10899(d)	Submit written notification of the initial classification of your source as a large iron and steel facility as required in 63.10880(f) for any subsequent reclassification as required in 63.10881(d)(2).
63.10900(b)	If you own or operate an existing large foundry, your notification of compliance status required by 63.9(h) must include each applicable certification of compliance, signed by a responsible official, in Table 4 of this subpart.

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 from the baghouse stack serving this emissions unit shall not exceed 0.07 gr/dscf.



Applicable Compliance Methods:

Compliance with the short-term emissions limitation was demonstrated based upon the emission testing conducted on April 10, 2015, demonstrating compliance with the allowable mass emission rates for PE.

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 Limitations:

PM₁₀/PM_{2.5} emissions from the baghouse stack serving this emissions unit shall not exceed 0.118 gr/dscf.

Applicable Compliance Methods:

Compliance with the short-term emissions limitation was demonstrated based upon the emission testing conducted on April 10, 2015, demonstrating compliance with the allowable mass emission rates for PM₁₀.

If required, PM₁₀ emissions shall be determined according to test Methods 201/201A, and 202 as set forth in 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

c. Emissions Limitations:

CO emissions from the baghouse stack serving this emissions unit shall not exceed 2.5 lbs per ton of iron produced.

Applicable Compliance Methods:

The lb of CO/ton of iron emissions limitation was established during the most recent emission tests that demonstrated that the emissions unit was in compliance (2.5 lbs CO/ton, per March 2006 emission tests).

If required, CO emissions shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

d. Emissions Limitation:

NO_x emissions from the baghouse stack serving this emissions unit shall not exceed 0.45 lb/ton of iron produced.



Applicable Compliance Method:

The hourly emissions limitation was established based on the emissions factor of 0.45 lb NO_x/ton from FIRE Version 6.25, SCC 03-04-003-04 plus 4.5 safety factor.

If required, NO_x emissions shall be determined according to test Methods 1 - 4, and 7 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.

e. Emissions Limitation:

VOC emissions from the baghouse stack serving this emissions unit shall not exceed 0.18 lb/ton of iron produced.

Applicable Compliance Method:

The hourly emissions limitation was established based on the emissions factor of 0.18 lb VOC/ton (uncontrolled EF) from FIRE Version 6.25, SCC 03-04-003-04.

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

f. Emissions Limitation:

SO₂ emissions from the baghouse stack serving this emissions unit shall not exceed 0.072 lb/ton of iron produced.

Applicable Compliance Method:

The hourly emissions limitation was established based on the emissions factor of 0.072 lb SO₂/ton from stack testing conducted on 5/18/07.

If required, SO₂ emissions shall be determined according to test Methods 1 - 4, and 6 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.

g. Emissions Limitation:

PE shall not exceed 23.00 tons per rolling, 12-month period.

PM₁₀/PM_{2.5} emissions shall not exceed 38.44 tons per rolling, 12-month period.

CO emissions shall not exceed 76.13 tons per rolling, 12-month period.



NOx emissions shall not exceed 13.69 tons per rolling, 12-month period.

VOC emissions shall not exceed 5.48 tons per rolling, 12-month period.

SO₂ emissions shall not exceed 2.18 tons per rolling, 12-month summation.

Applicable Compliance Methods:

Compliance with the rolling, 12-month emissions limitations shall be demonstrated through the records required in d)(2) and the following equation:

(emissions factor in lb/ton from most recent stack test)*(actual annual throughput in tons as recorded in d)(2))*(1 ton/2,000 lbs)

h. Emissions Limitation:

Visible particulate emissions of fugitive dust from any non-stack egress point serving this emissions unit shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

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

i. Emissions Limitation:

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

Applicable Compliance Method:

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

j. Emissions Limitations:

You must not discharge to the atmosphere emissions from any metal melting furnace that exceed 0.8 pounds of particulate matter per ton of metal charged or 0.06 pounds of total metal HAP per ton of metal charged for an existing iron and steel foundry. (63.10895(c)(1))

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. (63.10895(e))

Applicable Compliance Method:

Compliance shall be determined in accordance with the testing requirements pursuant to 40 CFR Part 63, Subpart ZZZZZ. See f)(2) below.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the requirements of 40 CFR Part 63, Subpart ZZZZZ as follows:

a. The emission testing shall be conducted, or have been conducted, as required in 40 CFR 63.10898(a) and (b) to demonstrate compliance with the PM or total metal HAP limit in 63.10895(c) and shall be conducted as required in 40 CFR 63.10898(i) to demonstrate compliance with the fugitive opacity limit in 63.10895(e), in accordance with the following requirements:

63.10898(a)	Conduct, or have conducted, a performance test to demonstrate initial compliance with the applicable emissions limits for each metal melting furnace that is subject to an emissions limit in 63.10895(c) and for each building or structure housing foundry operations that is subject to the opacity limit for fugitive emissions in 63.10895(e). Conduct, or have conducted the test within 180 days of your compliance date and report the results in your notification of compliance status.
63.10898(b)	Conduct subsequent performance tests to demonstrate compliance with all applicable PM or total metal HAP emissions limits in 63.10895(c) for a metal melting furnace no less frequently than every 5 years and each time elect to change an operating limit or make a process change likely to increase HAP emissions.
63.10898(c)	Conduct each performance test according to 63.7(e)(1), Table 1 to this subpart, and 63.10898(d).
63.10898(d)	Use equation 1 to determine compliance with the applicable PM or total metal HAP emissions limit in a lb/ton of metal charged format.
63.10898(h)	Conduct each opacity test for fugitive emission according to the requirements in 63.6(h)(5) and Table 1.
63.10898(i)	Conduct subsequent performance test to demonstrate compliance with the opacity limit in 63.10895(e) no less frequently than every 6 months and each time you make a process change likely to increase fugitive emissions.
63.10898(j)	In your performance test report, certify that the capture system operated normally during the performance test.

b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) as detailed in Table 1 of 40 CFR Part 63, Subpart ZZZZZ:



PM, U.S. EPA Test Methods 1-5;
Fugitive Opacity, U.S. EPA Test Method 9;

Alternative U.S. EPA approved test methods in accordance with the requirements of Table 1 of 40 CFR Part 63, Subpart ZZZZZ.

Fugitive Opacity, U.S. EPA Test Method 22 - if applicable

- c. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- e. Personnel from the appropriate Ohio EPA District Office or 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.
- f. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or 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 appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

- (1) None.

4. **P907, Shell Molding Machines**

Operations, Property and/or Equipment Description:

Twenty shell molding machines with a maximum throughput of 11.7 tons/hr and 0.5 MMBtu/hr burner rating, with a maximum annual throughput restriction of 42,588 tons/rolling, 12-month period, controlled by a baghouse with 99% capture efficiency and 99% control efficiency; Administrative modification of PTI 06-06423, issued 5/22/2003, to add BAT requirements for VOC emissions.

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)	<p>Particulate emissions (PE) and emissions of particulate matter less than 10 microns in diameter (PM₁₀) and particulate matter less than 2.5 microns in diameter (PM_{2.5}) from any stack shall not exceed 0.015 gr/dscf (equivalent to 7.91 lbs/hr at maximum process rate) or there shall be no visible particulate emissions from the baghouse stack, whichever is less stringent.</p> <p>PE shall not exceed 34.64 tons/year.</p> <p>Nitrogen oxide (NO_x) emissions shall not exceed 5.90 lbs/hr and 10.86 tons per year.</p> <p>Sulfur dioxide (SO₂) emissions shall not exceed 3.74 lbs/hr and 6.82 tons per year.</p> <p>Volatile organic compound (VOC) emissions shall not exceed 26.44 lbs/hr and 48.12 tons per year.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>See b)(2)a.-b. below.</p> <p>The requirements of this rule also include compliance with and the requirements of OAC rule 3745-31-05(D) as found in Section B.2.-6.</p>
b.	OAC rule 3745-17-07(B)	Visible PE of fugitive dust shall not exceed 20% opacity, as a 3-minute average.
c.	OAC rule 3745-17-07(A) OAC rule 3745-17-08(B)(3) OAC rule 3745-18-06	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).
d.	<p>40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880 – 10906)</p> <p>[In accordance with 40 CFR 63.10880 (a), this emissions unit is part of a mold/core making line as defined in 40 CFR 63.10906, at an existing large iron and steel foundry that is an area source of HAPs that commenced construction or reconstruction before September 17, 2007 with an annual metal melt production rate of 20,000 tons or greater.]</p>	See c)(1) and d)(3) below.
e.	40 CFR 63.1-15 (40 CFR 63.7760)	Table 3 to Subpart ZZZZZ of 40 CFR Part 63 – Applicability of General Provisions to New and Existing Affected Sources Classified as Large Foundries shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control measures for the above-identified shell molding machine operations 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 shell molding machine operations, and will ensure that the baghouse captures 99% of the emissions from the shell molding machine

operations. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- b. 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) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart ZZZZZ, including the following sections:

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

- (1) The permittee shall perform daily 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. 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 emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission 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.

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any 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 emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- (3) The permittee shall comply with all the applicable monitoring and recordkeeping requirements under 40 CFR Part 63, Subpart ZZZZZ, including the following sections:

63.10889(b)(4)	Keep records to document use of any binder chemical formulation that does not contain methanol as a specific ingredient of the catalyst formulation for each furfuryl alcohol warm box mold or core making line as required by 63.10886. These records must be the MSDS (provided it contains appropriate information), a certified product data sheet, or a manufacturer’s hazardous air pollutant data sheet.
63.10889(b)(5)	Keep records of the annual quantity and composition of each HAP-containing chemical binder or coating material used to make molds and cores. These records must be copies of purchasing records, MSDS, or other documentation that provides information on the binder or coating materials used.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit 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.

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

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

f) Testing Requirements

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

a. Emissions Limitation:

PE and emissions of PM₁₀ and PM_{2.5} from any stack shall not exceed 0.015 gr/dscf.

PE shall not exceed 7.91 lbs/hr.

Applicable Compliance Method:

See f)(2) below.

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.

Applicable Compliance Method:

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

c. Emissions Limitation:

PE shall not exceed 34.64 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated by the monitoring and recordkeeping requirements in Section B. above and the following calculation:

$$[(0.015 \text{ gr/dscf}) \times (61,500 \text{ dscf/min}) \times (60 \text{ min/hr}) \times (8,760 \text{ hrs/yr}) / (7,000 \text{ gr/lb}) / (2,000 \text{ lbs/ton})] + [(0.03 \text{ lb PE/ton (Ohio RACM, Table 2.7-4 and 0.75:1 sand: metal ratio)}) \times (\text{actual throughput of sand in tons/rolling, 12-month period}) \times (1 - 99\% \text{ capture efficiency}) / (2,000 \text{ lbs/ton})]$$

d. Emissions Limitations:

NOx emissions shall not exceed 5.90 lbs/hr and 10.86 tons per year.

Applicable Compliance Method:

The hourly emissions limitation was established based upon the following calculation:

$$(100 \text{ lb NOx/MMscf (AP 42 Chapter 1.4 (07/1998))} \times (0.00049 \text{ MMCF/hr}) + (0.5 \text{ lb NOx/ton (WebFIRE SCC 30400370)}) \times (11.7 \text{ tons/hr}) = 5.90 \text{ lbs/hr}$$

If required, NOx emissions shall be determined according to test Methods 1 - 4, and 7 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.

Compliance with the annual emissions limitation shall be demonstrated by the following calculation:

$$(100 \text{ lb NOx/MMscf (AP 42 Chapter 1.4 (07/1998))} \times (4.29 \text{ MMCF/yr}) / (2,000 \text{ lbs/ton}) + (0.5 \text{ lb NOx/ton (WebFIRE SCC 30400370)}) \times (42,588 \text{ tons/yr}) / (2,000 \text{ lbs/ton}) = 10.86 \text{ tons}$$

e. Emissions Limitations:

SO₂ emissions shall not exceed 3.74 lbs/hr and 6.82 tons per year.



Applicable Compliance Method:

The hourly emissions limitation was established based upon the following calculation:

$$(0.60 \text{ lb SO}_2/\text{MMscf (AP 42 Chapter 1.4 (07/1998))} \times 0.00049 \text{ MMCF/hr}) + (0.32 \text{ lb SO}_2/\text{ton (WebFIRE SCC 30400370)} \times 11.7 \text{ tons/hr}) = 3.74 \text{ lbs/hr}$$

If required, SO₂ emissions shall be determined according to test Methods 1 - 4, and 6 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.

Compliance with the annual emissions limitation shall be demonstrated by the following calculation:

$$(0.60 \text{ lb SO}_2/\text{MMscf (AP 42 Chapter 1.4 (07/1998))} \times 4.29 \text{ MMCF/yr}) / (2,000 \text{ lbs/ton}) + (0.32 \text{ lb SO}_2/\text{ton (WebFIRE SCC 30400370)} \times 42,588 \text{ tons/yr}) / (2,000 \text{ lbs/ton}) = 6.82 \text{ tons}$$

f. Emissions limitation:

VOC emissions shall not exceed 26.44 lbs/hr and 48.12 tons per year.

The hourly emissions limitation was established based upon the following calculation:

$$(2.26 \text{ lb VOC/ton (0.113\% VOC by weight as submitted by permittee)}) \times 11.7 \text{ tons/hr}$$

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

Compliance shall be demonstrated by the monitoring and recordkeeping requirements in Section B. above.

This emissions limitation was established as follows:

$$(2.26 \text{ lb VOC/ton (0.113\% VOC by weight as submitted by permittee)}) \times (42,588 \text{ tons sand/rolling, 12-month period}) / (2,000 \text{ lbs/ton})$$

g. Emissions Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity, as a 3-minute average.



Draft Permit-to-Install
OSCO Inc.-Jackson Division
Permit Number: P0119668
Facility ID: 0640010009

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Applicable Compliance Method:

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

(2) The permittee conducted emissions testing demonstrating compliance with the PE limitations on May 29, 2002.

g) Miscellaneous Requirements

(1) None.

5. **P908, 9 ft. Cooling Drum**

Operations, Property and/or Equipment Description:

9 ft Rotary cooling drum and vibratory shakeout (13 TPH and an annual limit of 60,840 tons) vented to the "IAC Baghouse" and the "Wheelerlaborator Baghouse" both with 99% capture efficiency and 99% control efficiency; Hours of operation restriction of 4,680 hours per rolling, 12-month period; Administrative modification of PTI P0105982 issued 7/30/2010 to update the facility wide synthetic minor, correct BAT requirements, and remove MACT Subpart ZZZZ requirements that do not apply.

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) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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 stacks serving EUs F007, F008, and P908 shall not exceed 0.010 grain per dry standard cubic foot of exhaust gases. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-07(B), 3745-17-11, and 3745-31-05(D).
b.	OAC rule 3745-31-05(D) June 30, 2008 (Synthetic Minor to avoid NSR major modification thresholds)	PE/PM ₁₀ /PM _{2.5} from EUs F007, F008 and P908 shall not exceed 18.90 tons per rolling, 12-month period. Fugitive PE shall not exceed 0.20 ton per rolling, 12-month period. Fugitive emissions of PM ₁₀ shall not exceed 0.17 ton per rolling, 12-month period.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Fugitive emissions of PM _{2.5} shall not exceed 0.05 ton per rolling, 12-month period. See Section B.2.-6. above for HAP restrictions.
c.	OAC rule 3745-17-07(A)	Visible PE from the stacks shall not exceed 20% opacity as a 6-minute average.
d.	OAC rule 3745-17-07(B)(1)	Visible PE of fugitive dust shall not exceed 20% opacity as a 3-minute average.
e.	OAC rule 3745-17-08	The permittee shall utilize reasonably available control measures to minimize or eliminate visible particulate emissions of fugitive dust. See b)(2)a.-c. below.
f.	OAC rule 3745-17-11	PE from the stacks shall not exceed 22.86 lbs/hr.

(2) Additional General Terms and Conditions

- a. The permittee shall employ reasonably available control measures for the above-identified cooling 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 cooling operations, and will ensure that both of the baghouses (“IAC Baghouse” and “Wheelabrator Baghouse” controlling emission units F007, F008, and P908) capture 99% of the emissions from the cooling operations. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- b. For each cooling 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 material handling operations 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 that shall not exceed 0.010 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 "IAC Baghouse" and "Wheelabrator Baghouse" (controlling EUs F007, F008, P908) for purposes of limiting the potential to emit of PE/PM₁₀/PM_{2.5} in order to avoid NSR major modification thresholds. See Section B.3.a)(1) and Section B.3.a)(3) for these restrictions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit and 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 emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

(Authority for term: OAC rule 3745-17-07(B), OAC rule 3745-77-07(C))

- (2) The permittee shall maintain records which list the following information:
 - a. the condition and operating status of each time meter for the month;
 - b. the total monthly hours of operation;

- c. the rolling, 12-month summation of the hours of operation;
- d. the total monthly emissions of stack and fugitive PE/PM₁₀/PM_{2.5};
- e. the rolling, 12-month summation of stack and fugitive PE/PM₁₀/PM_{2.5}; and,
- f. See Section B.5.a)(7)-(8) above.

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 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,
 - b. identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and
 - c. describe 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 February 15 and August 15 of each year and shall cover the previous 6-month period.

- (3) The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of:
 - a. the rolling, 12-month limitation on the total operating hours of this emissions unit, and;
 - b. the rolling, 12-month limitation on PE, and emissions of PM₁₀, and PM_{2.5}.

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

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 Limitations:

PE, and emissions of PM₁₀, and PM_{2.5} from the stacks serving EUs F007, F008, and P908 shall not exceed PE from the stacks shall not exceed 0.010 grain per



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dry standard cubic foot of exhaust gases, whenever the emissions unit is in operation.

PE/PM₁₀/PM_{2.5} from the stacks shall not exceed 22.86 lbs/hr.

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:

PE/PM₁₀/PM_{2.5} from the stacks serving EUs F007, F008 and P908 shall not exceed 18.90 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by compliance with the monitoring and recordkeeping requirement in Section B.4)(a)(2) and B.4)(a)(7) above and demonstrating compliance with f)(1)a.

This emissions limitation was established by the following calculations:

Wheelabrator baghouse:

$$(0.01 \text{ gr/dscf}) * (36,000 \text{ cf/min}) * ((460+70)/(460+121)) * (60 \text{ min/hr}) * (1 \text{ lb}/7,000 \text{ gr}) * (4,680 \text{ hrs/year (restricted)}) * (1 \text{ ton}/2,000 \text{ lbs}) = 6.59 \text{ tons}$$

IAC baghouse:

$$(0.01 \text{ gr/dscf}) * (72,000 \text{ cf/min}) * ((460+70)/(460+162)) * (60 \text{ min/hr}) * (1 \text{ lb}/7,000 \text{ gr}) * (4,680 \text{ hrs/year (restricted)}) * (1 \text{ ton}/2,000 \text{ lbs}) = 12.31 \text{ tons}$$

Total:

$$6.59 \text{ tons} + 12.31 \text{ tons} = 18.90 \text{ tons}$$

c. Emissions Limitation:

Fugitive PE shall not exceed 0.20 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by the following calculation:

$$(0.65 \text{ lb PE/ton (AIRS (03/1990))}) * (\text{Actual throughput in tons/rolling, 12-month period}) * (1-0.99 \text{ (capture efficiency)}) * (1 \text{ ton}/2,000 \text{ lbs})$$



d. Emissions Limitation:

Fugitive emissions of PM₁₀ shall not exceed 0.17 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by the following calculation:

$(0.553 \text{ lb PE/ton (PM Calculator SCC 30400350)}) \times (\text{Actual throughput in tons/rolling, 12-month period}) \times (1 - 0.99 \text{ (capture efficiency)}) \times (1 \text{ ton}/2,000 \text{ lbs})$

e. Emissions Limitation:

Fugitive emissions of PM_{2.5} shall not exceed 0.05 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by the following calculation:

$(0.195 \text{ lb PE/ton (PM Calculator SCC 30400350)}) \times (\text{Actual throughput in tons/rolling, 12-month period}) \times (1 - 0.99 \text{ (capture efficiency)}) \times (1 \text{ ton}/2,000 \text{ lbs})$

f. Emissions Limitation:

Visible PE from the stacks shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

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

g. Emissions Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

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



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contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

6. **Emissions Unit Group - Pouring Boxes #1 and #2: F007, F008,**

EU ID	Operations, Property and/or Equipment Description
F007	Pouring Box #1 with a maximum throughput of 6.5 tons/hr and a restriction of 30,420 tons/year; controlled by two baghouses both with 99% capture efficiency and 99% control efficiency; Hours of operation restriction of 4,680 hours per rolling, 12-month period; Administrative modification of PTI 06-1390 issued 6/26/1985 to update BAT requirements to correct the PE emissions limit, add VOC and CO emissions limitations, and change the EU IDs from P010 to F007.
F008	Pouring Box #2 with a maximum throughput of 6.5 tons/hr and a restriction of 30,420 tons/year; controlled by two baghouses both with 99% capture efficiency and 99% control efficiency; Hours of operation restriction of 4,680 hours per rolling, 12-month period; Administrative modification of PTI 06-3368 issued 4/28/1993 to update BAT requirements to correct the PE emissions limit, include VOC and CO emissions limitations, and change the EU IDs from P015 to F008.

- 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)	<p>Particulate emissions (PE) and emissions of particulate matter less than 10 microns in diameter (PM₁₀) and particulate matter less than 2.5 microns in diameter (PM_{2.5}) from the stacks serving EUs F007, F008, and P908 shall not exceed 0.010 grain per dry standard cubic foot of exhaust gases.</p> <p>PE/PM₁₀/PM_{2.5} from the stacks serving EUs F007, F008 and P908 shall not exceed 18.90 tons per rolling, 12-month period.</p> <p>Fugitive PE shall not exceed 0.49 ton per rolling, 12-month period.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Fugitive emissions of PM₁₀ shall not exceed 0.34 ton per year.</p> <p>Fugitive emissions of PM_{2.5} shall not exceed 0.20 ton per rolling, 12-month period.</p> <p>Volatile organic compound (VOC) emissions shall not exceed 3.22 pounds per hour and 7.54 tons per year.</p> <p>Carbon monoxide (CO) emissions shall not exceed 15.73 pounds per hour and 36.81 tons per year.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>See b)(2)a.-c. below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-07(B) and 3745-31-05(D) as found in Section B.2.-6.</p>
b.	OAC rule 3745-17-07(A)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average.
c.	OAC rule 3745-17-07(B)(1)	Visible PE of fugitive dust shall not exceed 20% opacity, as a 3-minute average.
d.	OAC rule 3745-17-08	The emissions limitation established pursuant to this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee shall employ best/reasonably available control measures for the above-identified pouring 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 pouring operations, and will ensure that both of the baghouses (“IAC baghouse” and “wheelabrator baghouse” controlling emission units F007, F008, and P908) capture 99% of the emissions from the pouring operations. Nothing in

this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- b. For each pouring 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 material handling operations 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) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit and 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 emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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 semiannual written reports that
 - a. identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. 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
 - c. describe 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 PM₁₀ and PM_{2.5} from the stacks serving EUs F007, F008, and P908 shall not exceed 0.010 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:

PE/PM₁₀/PM_{2.5} from the stacks serving EUs F007, F008 and P908 shall not exceed 18.90 tons per rolling, 12-month period.



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Applicable Compliance Method:

Compliance shall be demonstrated by compliance with the monitoring and recordkeeping requirement in Section B.4)(a)(2) and B.4)(a)(7) above and demonstrating compliance with f)(1)a.

This emissions limitation was established by the following calculations:

Wheelabrator baghouse:

$$(0.01 \text{ gr/dscf}) \times (36,000 \text{ cf/min}) \times ((460+70)/(460+121)) \times (60 \text{ min/hr}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (4,680 \text{ hrs/year (restricted)}) \times (1 \text{ ton}/2,000 \text{ lbs}) = 6.59 \text{ tons}$$

IAC baghouse:

$$(0.01 \text{ gr/dscf}) \times (72,000 \text{ cf/min}) \times ((460+70)/(460+162)) \times (60 \text{ min/hr}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (4,680 \text{ hrs/year (restricted)}) \times (1 \text{ ton}/2,000 \text{ lbs}) = 12.31 \text{ tons}$$

Total:

$$6.59 \text{ tons} + 12.31 \text{ tons} = 18.90 \text{ tons}$$

c. Emissions Limitation:

Fugitive PE shall not exceed 0.49 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by the following calculation:

$$(3.20 \text{ lb PE/ton (WebFIRE 6.25 SCC 3-04-003-31)}) \times (\text{Actual throughput in tons/rolling, 12-month period}) \times (1-0.99 \text{ (capture efficiency)}) \times (1 \text{ ton}/2,000 \text{ lbs})$$

d. Emissions Limitation:

Fugitive emissions of PM₁₀ shall not exceed 0.34 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by the following calculation:

$$(2.24 \text{ lb PM}_{10}/\text{ton (PM Calculator SCC 3-04-003-31)}) \times (\text{Actual throughput in tons/rolling, 12-month period}) \times (1-0.99 \text{ (capture efficiency)}) \times (1 \text{ ton}/2,000 \text{ lbs})$$

e. Emissions Limitation:

Fugitive emissions of PM_{2.5} shall not exceed 0.20 ton per rolling, 12-month period.



Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated by the following calculation:

$(1.34 \text{ lb PM}_{2.5}/\text{ton (PM Calculator SCC 3-04-003-31)}) * (\text{Actual throughput in tons/rolling, 12-month period}) * (1-0.99 \text{ (capture efficiency)}) * (1 \text{ ton}/2,000 \text{ lbs})$

f. Emissions Limitations:

VOC emissions shall not exceed 3.22 pounds per hour and 7.54 tons per year.

Applicable Compliance Method:

The hourly emissions limitation was established using the following calculation:

$(0.496 \text{ lb VOC/ton (Stack testing Nov.2002 + 10\% safety factor)}) * (6.50 \text{ tons/hour})$

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

Compliance with the annual emissions limitation shall be demonstrated using the following calculation:

$(3.22 \text{ lbs/hr}) * (\text{actual rolling, 12-month hours of operation from Section B.4.a})(8) * (1\text{ton}/2,000 \text{ lbs})$

g. Emissions Limitations:

CO emissions shall not exceed 15.73 pounds per hour and 36.81 tons per year.

Applicable Compliance Method:

The hourly emissions limitation was established using the following calculation:

$(2.42 \text{ lb CO/ton (Stack testing Nov.2002 + 10\% safety factor)}) * (6.50 \text{ tons/hour})$

If required, CO emissions shall be determined according to test Methods 1 - 4, and 10 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.

Compliance with the annual emissions limitation shall be demonstrated using the following calculation:

$(15.73 \text{ lbs/hour}) * (\text{actual rolling, 12-month hours of operation from Section B.4.a})(8) * (1\text{ton}/2,000 \text{ lbs})$



h. Emissions Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

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

i. Emissions Limitation:

Visible PE of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.