



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

8/30/2016

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0773010001
 Permit Number: P0120704
 Permit Type: Administrative Modification
 County: Scioto

Certified Mail

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

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

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

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

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

If you have any questions regarding your permit, please contact Portsmouth City Health Dept., Air Pollution Unit at (740)353-5156 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: U.S. EPA
Portsmouth; Kentucky; West Virginia



FINAL

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

Facility ID:	0773010001
Permit Number:	P0120704
Permit Type:	Administrative Modification
Issued:	8/30/2016
Effective:	8/30/2016



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

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. Federally Enforceable Standard Terms and Conditions	4
2. Severability Clause	4
3. General Requirements	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting	6
6. Compliance Requirements	6
7. Best Available Technology	7
8. Air Pollution Nuisance	8
9. Reporting Requirements	8
10. Applicability	8
11. Construction of New Sources(s) and Authorization to Install	8
12. Permit-To-Operate Application	9
13. Construction Compliance Certification	10
14. Public Disclosure	10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	10
16. Fees.....	10
17. Permit Transfers	10
18. Risk Management Plans	10
19. Title IV Provisions	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions	13
1. P907, East Cupola	14



Final Permit-to-Install
OSCO Industries - Portsmouth Division
Permit Number: P0120704
Facility ID: 0773010001
Effective Date: 8/30/2016

Authorization

Facility ID: 0773010001
Facility Description: Grey Iron Foundry
Application Number(s): M0003950
Permit Number: P0120704
Permit Description: Agency-initiated administrative modification to PTI 07-00568 issued 8/16/2010, for East Cupola (P907) to remove references to the West Cupola (P906) which has been permanently shutdown and remove T&C associated with the scrubber which has been removed from service.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 8/30/2016
Effective Date: 8/30/2016

This document constitutes issuance to:

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

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

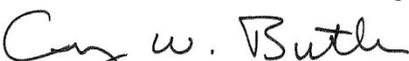
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0120704

Permit Description: Agency-initiated administrative modification to PTI 07-00568 issued 8/16/2010, for East Cupola (P907) to remove references to the West Cupola (P906) which has been permanently shutdown and remove T&C associated with the scrubber which has been removed from service.

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

Emissions Unit ID:	P907
Company Equipment ID:	East Cupola
Superseded Permit Number:	07-00568
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
OSCO Industries - Portsmouth Division
Permit Number: P0120704
Facility ID: 0773010001
Effective Date:8/30/2016

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

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

3. General Requirements

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

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

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

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

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

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

10. Applicability

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

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

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

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

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

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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



Final Permit-to-Install
OSCO Industries - Portsmouth Division
Permit Number: P0120704
Facility ID: 0773010001
Effective Date: 8/30/2016

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart ZZZZZ: P907. The complete GACT requirements, including the GACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Portsmouth Local Air Agency.
3. All of the emissions units located at this facility are subject to the facility-wide opacity limitation for fugitive emissions established in 40 CFR 63.10895(e). However, the fugitive particulate emissions from individual emissions units at this facility are subject to opacity limitations under BAT which may be more stringent than the opacity limitation from 40 CFR 63.10895(e).



Final Permit-to-Install
OSCO Industries - Portsmouth Division
Permit Number: P0120704
Facility ID: 0773010001
Effective Date:8/30/2016

C. Emissions Unit Terms and Conditions

1. P907, East Cupola

Operations, Property and/or Equipment Description:

25 tons per hour east iron cupola: melting of metallic materials to form molten gray iron castings controlled with an afterburner and baghouse.

Administrative modification to PTI 07-00568 (issued 8/16/2010) to remove terms and conditions associated with the scrubber and remove references to the west cupola (P906) which was permanently shut down 8/27/12 .

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 shall not exceed 0.07 gr/dscf of exhaust gases and 9.78 pounds per hour.</p> <p>Particulate emissions less than 10 microns (PM₁₀) from the baghouse stack shall not exceed 0.0784 gr/dscf of exhaust gases and 10.96 pounds per hour.</p> <p>Carbon monoxide (CO) emissions from the baghouse stack shall not exceed 2.5 lbs per ton of molten iron and 62.5 pounds per hour.</p> <p>Sulfur dioxide (SO₂) emissions from the baghouse stack shall not exceed 259.04 pounds per hour and 414.47 tons per year.</p> <p>Nitrogen oxides (NO_x) emissions from the baghouse stack shall not exceed 11.24 pounds per hour and 17.98 tons per year.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Volatile organic compounds (VOC) emissions from the baghouse stack shall not exceed 6.74 pounds per hour and 10.79 tons per year.</p> <p>Lead (Pb) emissions from the baghouse stack shall not exceed 0.25 pound per hour and 0.40 ton per year.</p> <p>Visible PE of fugitive dust from any non-stack egress point serving this emissions unit shall not exceed 20% opacity as a 3-minute average.</p>
b.	OAC rule 3745-31-05(D)	<p>PE from the baghouse stack shall not exceed 24.75 tons per year, as a rolling, 12-month summation.</p> <p>PM₁₀ emissions from the baghouse stack shall not exceed 30.68 tons per year, as a rolling, 12-month summation.</p> <p>CO emissions from the baghouse stack shall not exceed 99.90 tons per year, as a rolling, 12-month summation.</p>
c.	OAC rule 3745-17-07(A)	See b)(2)a.
d.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-18-06(E)(2)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-21-08(D)	See b)(2)b.
g.	<p>40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906)</p> <p>[In accordance with 40 CFR 63.10895(c), this emissions unit is a cupola metal melting furnace at an existing iron and steel foundry subject to the emissions limitations/control measures specified in this section.]</p>	<p>The permittee shall comply with either limit:</p> <p>0.8 pound of PM per ton of metal charged; or</p> <p>0.06 pound of total metal HAP per ton of metal charged.</p> <p>[40 CFR 63.10895(c)(1)]</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
h.	40 CFR 63.1 – 63.15 (40 CFR 63.10900)	Table 3 in to Subpart ZZZZZ of 40 CFR Part 63 – Applicability of General Provisions to Subpart ZZZZZ shows which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply.
i.	OAC rule 3745-114-01	This source is subject to 40 CFR Part 63, Subpart ZZZZZ, therefore, air toxics modeling for manganese and lead is not required.

(2) Additional Terms and Conditions

- a. Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- b. CO gases generated during the operation of this emissions unit shall be combusted at 1,300 degrees Fahrenheit for 0.3 second or greater in a direct-flame afterburner or equivalent device equipped with an indicating pyrometer which is positioned in the working area at the operator's eye level.

This facility employs a thermocouple instead of an indicating pyrometer to measure the temperature in the afterburner. Ohio EPA considers the thermocouple to be an equivalent device and plans to revise OAC rule 3745-21-08(D) in the future to allow for an indicating pyrometer or equivalent device for measuring the temperature in the afterburner.

c) Operational Restrictions

(1) Emissions unit P907 shall not exceed the following:

- a. 80,000 tons of molten iron produced per year; and
- b. 5,600 hours of operation per year.

Compliance with the operational restrictions shall be based upon a rolling, 12-month summation of the production of molten iron and hours of operation for emissions unit P907. The permittee has sufficient records to begin calculating and tracking compliance with this rolling, 12-month restriction upon issuance of this permit.

- (2) The permittee shall not employ coke with greater than 4% sulfur content in this emissions unit.
- (3) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880 – 63.10906).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the total tons of molten iron produced, in tons;
 - b. the total hours of operation;
 - c. the total PE, in tons;
 - d. the total PM₁₀ emissions, in tons;
 - e. the total CO emissions, in tons;
 - f. the rolling, 12-month summation of the tons of molten iron produced, in tons;
 - g. the rolling, 12-month summation of the hours of operation;
 - h. the rolling, 12-month summation of the PE, in tons;
 - i. the rolling, 12-month summation of the PM₁₀ emissions, in tons; and
 - j. the rolling, 12-month summation of the CO emissions, in tons.
- (2) The permittee shall maintain monthly records of the following:
 - a. fuel analysis report from the supplier demonstrating the sulfur content of the coke; and
 - b. average SO₂ emissions, in lbs/hr, (1.2 times % sulfur times the maximum tons/hour of iron produced).
- (3) The permittee shall properly install, operate and maintain equipment to monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt action to bring the operation of the control equipment within the acceptable range specified below, 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: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for pressure drop across the baghouse shall be based upon the manufacturer's specification until such time as any required emission testing is conducted.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Portsmouth Local Air Agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range 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. 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 15-minute average.

- (5) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive PE from 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 record any corrective actions and the cause, if known, when the requirements of OAC rule 3745-21-08 are not met in accordance with the Corrective Action Plan for the Cupola Carbon Monoxide Air Pollution Control System, as submitted to the Portsmouth Local Air Agency on March 12, 2008, or any subsequent revisions.
- (7) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880 – 63.10906).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following for this emissions unit:
 - a. all periods of time during which the pressure drop across the baghouse was outside of the range specified by the manufacturer;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or corrective action;
 - e. all 3-hour periods of time during which the afterburner combustion zone temperature was below the minimum temperature value specified above;
 - f. any exceedance of the rolling, 12-month hours of operation restriction specified above;

- g. any exceedance of the rolling, 12-month restriction for the tons of molten iron produced specified above.
- h. any exceedance of the rolling, 12-month emission limitation for PE specified above;
- i. any exceedance of the rolling, 12-month emission limitation for PM₁₀ specified above; and
- j. any exceedance of the rolling, 12-month emission limitation for CO specified above.

The reports shall identify the cause(s) (if known) of each excursion, duration of the excursion, applicable operating rates during the excursion, and the corrective actions which were taken for each excursion. These reports shall be submitted to the Portsmouth Local Air Agency by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

If an exceedance did not occur during the reporting period, then a report stating that fact is required.

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

These reports shall be submitted to the Portsmouth Local Air Agency by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

- (3) The permittee shall notify the Portsmouth local air agency in writing of any record showing the sulfur content exceeded the restriction in c)(2). The notification shall include a copy of such record and shall be sent to the Portsmouth local air agency within 30 days following the end of the calendar month.
- (4) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880 – 63.10906).

f) Testing Requirements

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

- a. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

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

b. Emission Limitation:

PE from the baghouse stack shall not exceed 0.07 gr/dscf of exhaust gases, 9.78 pounds per hour and 24.75 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

If required, compliance with the gr/dscf and pounds per hour emission limitations shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the record keeping requirements specified in d)(1).

c. Emission Limitation:

PM₁₀ emissions from the baghouse stack shall not exceed 0.0784 gr/dscf of exhaust gases, 10.96 pounds per hour and 30.68 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

If required, compliance with the gr/dscf and pounds per hour emission limitations shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 40 CFR Part 51, Appendix M, Methods 201A and 202.

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the record keeping requirements specified in d)(1).

d. Emission Limitation:

CO emissions from the baghouse stack shall not exceed 2.5 lbs per ton of molten iron, 62.5 pounds per hour and 99.90 tons per year as a rolling, 12-month summation.

Applicable Compliance Method:

If required, compliance with the lbs/ton of molten iron and pounds per hour emission limitations shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10.

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the record keeping requirements specified in d)(1).

e. Emission Limitation:

SO₂ emissions from the baghouse stack shall not exceed 259.04 pounds per hour and 414.47 tons per year.

Applicable Compliance Method:

If required, compliance with the pounds per hour emission limitation shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6C.

Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor of 10.37 pounds/ton metal charged times the maximum tons of metal charged per year, divided by 2,000 pounds/ton. The SO₂ emission factor was back calculated from the OAC rule 3745-18-06(E)(2) allowable calculated from the maximum process weight rate of 25 TPH.

f. Emission Limitation:

NO_x emissions from the baghouse stack shall not exceed 11.24 pounds per hour and 17.98 tons per year.

Applicable Compliance Method:

If required, compliance with the pounds per hour emission limitation shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7E.

Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor of 0.45 pound/ton metal charged times the maximum tons of metal charged per year, divided by 2,000 pounds/ton. The 0.45 lb/ton of metal charged NO_x emission factor was obtained by multiplying the FIRE 6.25 emission factor of 0.10 lb/ton of metal charged by a 4.5 safety factor.

g. Emission Limitation:

VOC emissions from the baghouse stack shall not exceed 6.74 pounds per hour and 10.79 tons per year.

Applicable Compliance Method:

If required, compliance with the pounds per hour emission limitation shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 25 or 25A.



Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor of 0.27 pound/ton metal charged times the maximum tons of metal charged per year, divided by 2,000 pounds/ton. The VOC emission factor was obtained from Fire 6.25 in addition to a 50% safety factor.

h. Emission Limitation:

Pb emissions from the baghouse stack shall not exceed 0.25 pound per hour and 0.40 ton per year.

Applicable Compliance Method:

If required, compliance with the pound per hour emission limitation shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 29.

Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor of 0.0100 pound/ton metal charged times the maximum tons of metal charged per year, divided by 2,000 pounds/ton. The Pb emission factor is based on Foundry MACT testing from GM and Waupacu.

i. Emission Limitation:

The permittee shall comply with either limit:

0.8 pound of PM per ton of metal charged; or

0.06 pound of total metal HAP per ton of metal charged.

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 for PE and 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 29 for total metal HAPs.

j. Emission Limitation:

Visible PE 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, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

(2) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880 – 63.10906).



Final Permit-to-Install
OSCO Industries - Portsmouth Division
Permit Number: P0120704
Facility ID: 0773010001
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- g) Miscellaneous Requirements
 - (1) None.