

Facility ID: 1576050200 Issuance type: Title V Proposed Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.
2. The following insignificant emissions units are located at this facility:
F002 - plant roadways and parking lots;
F004 - storage piles (PTI 15-1182); and
P028 - 35-ton holding furnace (PTI 15-1360).

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

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b State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:
B002 - boiler;
B003 - gas-fired heater;
B004 - Dravo gas heater;
P009 - shell coremaking operations;
Z004 - machine shop;
Z005 - parts cleaner #1 (machine shop);
Z006 - parts cleaner #2 (tool and die);
Z007 - parts cleaner #3 (maint. #1);
Z008 - parts cleaner #4 (maint. #2);
Z009 - parts cleaner #5 (QC lab);
Z010 - sandblaster;
Z011 - pattern shop;
Z012 - 3.0 MMBtu/hr makeup air unit;
Z013 - detergent parts washer #1;
Z014 - hot metal transfer; and
Z016 - core sand storage silo and two day bins w/heaters.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1576050200 Emissions Unit ID: F001 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Truck unloading and raw material transfer by overhead magnetic crane to rotating charge bucket.	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

2. Additional Terms and Conditions

- a. RACM shall include the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control the fugitive dust. Such equipment shall meet the following requirement:
 - (a) The capture efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping 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. Persons responsible for making the visible emission observations required in section A.III.1 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

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IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1576050200 Emissions Unit ID: F001 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1576050200 Emissions Unit ID: P001 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Shotblasting operation using steel shot and controlled by a fabric filter (Pangborn fabric filter - Collector #2).	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 5.77 lbs/hr.
	OAC rule 3745-17-07(A)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-08(B)	Visible fugitive particulate emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	See A.I.2.b below.

2. **Additional Terms and Conditions**

- a. Three emissions units have been grouped together because they are served by a common control device. The group contains emissions unit P001 (Shotblast #1), and four grinders from emissions unit P002 and emissions unit P017 (Shotblast #2), which are all controlled by the Pangborn fabric filter (Collector #2). The allowable PE rate was calculated from the uncontrolled mass rate of emissions (UMRE) determined during emission tests conducted on April 11, 1996 (35.35 lbs/hr UMRE) and

applying Curve P-I of Figure II from OAC rule 3745-17-11.

- b. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following: local hooding over the emissions unit.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

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II. Operational Restrictions

1. Except during start-up and initial loading of the filters following a filter change, the pressure drop across the fabric filter serving this emissions unit shall be maintained within the range of 2.0 to 7.0 inches of water while the emissions unit is in operation.

The manufacturer's recommended pressure drop range may be revised to more accurately reflect the fabric filter pressure drop range encountered during actual emissions unit(s) operating conditions that are in compliance with the applicable emission limitations. Any request to revise the pressure drop range shall be submitted in writing to the Canton City Health Department, Air Pollution Control Division. The request shall be accompanied by technical data that justifies the revision to the pressure drop range.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. 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 across the fabric filter on a once-per-shift basis.
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 the stack 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:
- the location and color of the emissions;
 - whether the emissions are representative of normal operations;
 - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - the total duration of any visible emission incident; and
 - 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. Persons responsible for making the visible emission observations required in section A.III.2 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
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 and/or visible fugitive particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Particulate emissions shall not exceed 5.77 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.
 - b. Emission Limitation:

Visible particulate emissions from any 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, compliance shall be demonstrated by performing visible particulate emission observations 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).
 - c. Emission Limitation:

Visible fugitive particulate emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing visible particulate emission observations 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. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 2 1/2 years after issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate emissions.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The fabric filter (Collector #2) shall be tested while collecting particulate emissions from the four bench and hand-held grinders (emissions unit P002), plus the particulate emissions from this emissions unit P001 and emissions unit P017. All the process equipment venting particulate emissions to the fabric filter shall be operating at or near their maximum production capacities or as close to the capacities as is physically possible, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.
 - e. The following parameter shall also be monitored and recorded during the emission testing: the pressure differential across the fabric filter serving this emissions unit.
 Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).

 Personnel from the Canton City Health Department, Air Pollution Control Division 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.

 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 Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s). The title page and the text of the report shall incorporate the Ohio EPA's identification (P001) for the emissions unit where applicable. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

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VI. **Miscellaneous Requirements**

1. The permittee shall comply with the approved preventative maintenance and malfunction abatement plan developed for the fabric filter serving this emissions unit (the Pangborn fabric filter - Collector #2).

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Facility ID: 1576050200 Emissions Unit ID: P001 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1576050200 Emissions Unit ID: P002 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Bench and hand-held grinders (22) and cutoff saws (2) controlled by two fabric filters (see A.I.2.a)	OAC rule 3745-31-05(A)(3) (PTI 15-1268)	Particulate emissions from the fabric filter serving this emissions unit (the Wheelabrator fabric filter - Collector #1) shall not exceed 1.16 lbs/hr. Fugitive particulate emissions shall not exceed 1 lb/hr. Compliance with this rule also includes compliance with OAC rules 3745-17-07(A), 3745-17-07(B), and 3745-17-08(B) See A.I.2.a below.
	OAC rule 3745-17-11(B)	See A.I.2.b below.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	See A.I.2.c below.

2. Additional Terms and Conditions

- a. In accordance with PTI 15-1268, best available technology (BAT) for this emissions unit was determined to be compliance with all applicable rules and expressed emission limitations and employment of fabric filters as control devices. Note: The Wheelabrator fabric filter (Collector #1) is the primary control device for this emissions unit. The Pangborn fabric filter (Collector #2), which is the primary control device for emissions units P001 and P017, also controls the particulate emissions generated by four of the grinders associated with this emissions unit. The particulate emissions generated by the four grinders associated with this emissions unit are accounted for in the emission limitations established for emissions units P001 and P017.
- 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).
- c. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following: local hooding over the emissions unit and the installation and operation of a well engineered fabric filter hopper evacuation system.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

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II. Operational Restrictions

1. Except during start-up and initial loading of the filters following a filter change, the pressure drop across each fabric filter serving this emissions unit shall be maintained within the range of 2.0 to 7.0 inches of water while the emissions unit is in operation.

The manufacturer's recommended pressure drop range may be revised to more accurately reflect the fabric filter pressure drop range encountered during actual emissions unit(s) operating conditions that are in compliance with the applicable emission limitations. Any request to revise the pressure drop range shall be submitted in writing to the Canton City Health Department, Air Pollution Control Division. The request shall be accompanied by technical data that justifies the revision to the pressure drop range.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the primary

fabric filter serving this emissions unit while the emissions unit is in operation. 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 across the fabric filter on a once-per-shift basis.

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 the stack 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 eliminate the visible emissions.
3. Persons responsible for making the visible emission observations required in section A.III.2 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter serving this emissions unit did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
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 eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Particulate emissions from the fabric filter serving this emissions unit (the Wheelabrator fabric filter - Collector #1) shall not exceed 1.16 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.
 - b. Emission Limitation:

Fugitive particulate emissions shall not exceed 1 lb/hr.

Applicable Compliance Method:

Compliance with this emission limitation may be assumed provided that all of the applicable requirements established pursuant to OAC rule 3745-31-05(A)(3) are satisfied.
 - c. Emission Limitation:

Visible particulate emissions from any 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, compliance shall be demonstrated by performing visible particulate emission observations 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).
 - d. Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing visible particulate emission observations 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. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 2 1/2 years after issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate emissions.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The tests shall be conducted while the emissions from 18 grinders and 2 cutoff saws are being vented to the primary fabric filter serving this emissions unit. The grinders and saws shall be operating at or near their maximum production capacities or as close to the capacities as is physically possible, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.
 - e. The following parameter shall also be monitored and recorded during the emission testing: the pressure differential across the fabric filter serving this emissions unit.
 Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).

Personnel from the Canton City Health Department, Air Pollution Control Division 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.

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 Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s). The title page and the text of the report shall incorporate the Ohio EPA's identification (P002) for the emissions unit where applicable. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

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VI. **Miscellaneous Requirements**

1. The permittee shall comply with the approved preventative maintenance and malfunction abatement plan developed for the fabric filter serving this emissions unit (the Wheelabrator fabric filter - Collector #1).

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Facility ID: 1576050200 Emissions Unit ID: P002 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1576050200 Emissions Unit ID: P003 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Hunter Shakeout includes a dump station and vibrating conveyors, controlled by a wet scrubber, (BACT wet scrubber - Collector #4).	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 14.94 lbs/hr.
	OAC rule 3745-17-07(A)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-08(B)	Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.
		See A.I.2.b below.

2. Additional Terms and Conditions

- a. This particulate emissions limitation was established by applying curve P-1 from Figure II and the UMRE of 154 lbs of particulate emissions per hour determined during the May 05, 1996 emission tests.

- b. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following: local hooding over the emissions unit.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

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II. Operational Restrictions

1. Except during startup, the wet scrubber water supply pressure shall be maintained at a value not less than 30 pounds per square inch gauge (psig) while the emissions unit is in operation

Except during startup, the wet scrubber water flow rate shall be continuously maintained at a value of not less than 350 gallons per minute (gpm) while the emissions unit is in operation.

Except during startup, the differential pressure drop across the wet scrubber (flange to flange) shall be maintained within the range of 5.5 to 7.0 inches of water while the emissions unit is in operation.

The wet scrubber manufacturer's recommended minimum water supply pressure value, minimum water flow rate value, and pressure drop range across the wet scrubber may be revised to more accurately reflect the minimum water supply pressure, minimum water flow rate, and pressure drop range across the wet scrubber encountered during actual emissions unit(s) operating conditions that are in compliance with the applicable emission limitations. Any request to revise the minimum water supply pressure, minimum water flow rate, and/or pressure drop range across the wet scrubber shall be submitted in writing to the Canton City Health Department, Air Pollution Control Division. The request shall be accompanied by technical data that justifies the revision to the minimum water supply pressure, minimum water flow rate, and/or pressure drop range across the wet scrubber.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the wet scrubber water supply pressure, the pressure drop across the wet scrubber, and the wet scrubber water flow rate while the emissions unit is in operation. 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 wet scrubber water supply pressure, the pressure drop across the wet scrubber, and the wet scrubber water flow rate on a once-per-shift basis.

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:

- the location and color of the emissions;
- whether the emissions are representative of normal operations;
- if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- the total duration of any visible emission incident; and
- 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. Persons responsible for making the visible emission observations required in section A.III.2 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the wet scrubber water supply pressure, the pressure drop across the wet scrubber, and/or the wet scrubber water flow rate did not comply with the allowable values or range specified above. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
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 and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Canton City Health

Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Particulate emissions shall not exceed 14.94 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.
 - b. Emission Limitation:

Visible particulate emissions from any 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, compliance shall be demonstrated by performing visible particulate emission observations 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).
 - c. Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing visible particulate emission observations 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. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 2 1/2 years after issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate emissions.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The tests shall be conducted while the emissions unit is operating at or near its maximum production capacity or as close to the capacity as is physically possible, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.
 - e. The following parameters shall also be monitored and recorded during the emission testing: the wet scrubber water supply pressure, the pressure drop across the wet scrubber, and the wet scrubber water flow rate.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).

Personnel from the Canton City Health Department, Air Pollution Control Division 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.

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 Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s). The title page and the text of the report shall incorporate the Ohio EPA's identification (P003) for the emissions unit where applicable. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

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VI. **Miscellaneous Requirements**

1. The permittee shall comply with the approved preventative maintenance and malfunction abatement plan developed for the wet scrubber serving this emissions unit (the BACT wet scrubber - Collector #4).

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Facility ID: 1576050200 Emissions Unit ID: P003 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1576050200 Emissions Unit ID: P004 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
15 MMBtu/hr Swindal Dressler FCC., natural gas-fired annealing furnace with no controls.	OAC rule 3745-17-11(B)	See A.I.2.a below.
	OAC rule 3745-17-07(A)	See A.I.2.b below.
	OAC rule 3745-17-08(B)	The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
	OAC rule 3745-17-07(B)	See A.I.2.c below. Visible fugitive particulate emissions shall not exceed 20% opacity, as a 3-minute average.
	OAC rule 3745-18-06(E)(1)	Sulfur dioxide emissions shall not exceed 31.8 lbs/hr.

2. Additional Terms and Conditions

- a. The uncontrolled mass rate of particulate emissions* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- (a) * The burning of natural gas is the only source of particulate emissions from this emissions unit.
- b. This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- c. At a minimum, RACM shall include the use of natural gas as fuel for the annealing furnace. No additional controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B) because the process materials employed in this emissions unit do not generate particulate emissions during the heating process.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping 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. Persons responsible for making the visible emission observations required in section A.III.1 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

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IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing visible particulate emission observations 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).

b. Emission Limitation:

Sulfur dioxide emissions shall not exceed 31.8 lbs/hr.

Applicable Compliance Method:

The sulfur dioxide emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials (iron castings) employed in this emissions unit do not generate sulfur dioxide emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1576050200 Emissions Unit ID: P004 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the

applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1576050200 Emissions Unit ID: P011 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
4.0 tons/hr coreless electric induction furnace controlled by a fabric filter (baghouse #6).	OAC rule 3745-31-05(A)(3) (PTI 15-01402)	Particulate emissions shall not exceed 1.3 lbs/hr and 5.69 tons/yr. Fugitive particulate emissions shall not exceed 0.68 lb/hr and 2.96 tons/yr.

PM10 stack emissions shall not exceed 1.3 lbs/hr and 5.69 tons/yr.

PM10 fugitive emissions shall not exceed 0.65 lb/hr and 2.83 tons/yr.

Lead stack emissions shall not exceed 0.06 lb/hr and 0.27 ton/yr.

Lead fugitive emissions shall not exceed 0.01 lb/hr and 0.04 ton/yr.

Compliance with this rule also includes compliance with OAC rules 3745-17-07(A), 3745-17-07(B), and 3745-17-08(B).

OAC rule 3745-17-07(A)

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

OAC rule 3745-17-07(B)(1)

Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

OAC rule 3745-17-08(B)

See section A.I.2.c below.

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).

2. Additional Terms and Conditions

- a. The particulate emissions and/or PM10 emissions from the outlet of the fabric filter serving this emissions unit shall not exceed a concentration of 0.006 grain per dry standard cubic foot (gr/dscf). This emission limitation is applicable to this emissions unit pursuant to a provision in a Consent Order entered in September of 1999 (Case No. 1998CV02342, State of Ohio, ex rel. Montgomery v. Ohio Cast Products, Inc., in the Court of Commons Pleas, Stark County, Ohio). Incorporation of this emission limitation in the terms for this emissions unit, in part, allows the permittee to terminate the Consent Order.
- b. The emissions units vented to baghouse #6 (emissions units P011 [Induction Furnace #1], P022 [Induction Furnace #2], and P023 [ductile inoculation operation]) shall not be disconnected from baghouse #6 without prior written approval of the Director. This requirement is applicable to this emissions unit pursuant to a provision in a Consent Order entered in September of 1999 (Case No. 1998CV02342, State of Ohio, ex rel. Montgomery v. Ohio Cast Products, Inc., in the Court of Commons Pleas, Stark County, Ohio). Incorporation of this requirement in the terms for this emissions unit, in part, allows the permittee to terminate the Consent Order.
- c. The permittee shall minimize or eliminate visible fugitive emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
 - i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust; and
 - ii. the collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

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II. Operational Restrictions

- 1. Except during startup and initial loading of filters following filter change, the pressure drop across the fabric filter shall be maintained within the manufacturer's recommended range of 2 to 8 inches of water, while the emissions unit is in operation.

The manufacturer's recommended pressure drop range may be revised to more accurately reflect the fabric filter pressure drop range encountered during actual emissions unit(s) operating conditions that are in compliance with the applicable emission limitations. Any request to revise the pressure drop range shall be submitted in writing to the Canton City Health Department, Air Pollution Control Division. The request shall be accompanied by technical data that justifies the revision to the pressure drop range.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter serving this emissions unit while the emissions unit is in operation. 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 across the fabric filter on a once-per-shift basis.
- 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 the stack 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 eliminate the visible emissions.
3. Persons responsible for making the visible emission observations required in section A.III.2 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified in section A.II.1. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
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 eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall also submit annual reports that specify the total stack and fugitive particulate/PM10 and stack and fugitive lead emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions 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 by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).
 - c. Emission Limitations:

Particulate emissions/PM10 stack emissions shall not exceed 0.006 gr/dscf, 1.3 lbs/hr (based on an airflow rate of 35,000 ACFM), and 5.69 tons/yr.

Applicable Compliance Methods:

Compliance with the gr/dscf and hourly emission limitations shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. See section A.V.2.

The annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.
 - d. Emission Limitations:

Fugitive particulate emissions shall not exceed 0.68 lb/hr and 2.96 tons/yr.

Applicable Compliance Methods:

Compliance with this emission limitation may be determined by multiplying the AP-42 emission factor of 0.9 lb of particulate emissions/ton of iron melted by the emissions unit's maximum process weight rate of 7.5 tons/hr and by the efficiency of the capture system serving this emissions unit (1 - 0.90).

The annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

e. Emission Limitations:

PM10 fugitive emissions shall not exceed 0.65 lb/hr and 2.83 tons/yr.

Applicable Compliance Methods:

Compliance with this emission limitation may be determined by multiplying the AP-42 emission factor of 0.86 lb of PM10/ton of iron melted by the emissions unit's maximum process weight rate of 7.5 tons/hr and by the efficiency of the capture system serving this emissions unit (1 - 0.90).

The annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

f. Emission Limitations:

Lead stack emissions shall not exceed 0.06 lb/hr and 0.27 ton/yr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be determined by multiplying the lead emission factor of 0.05 by the allowable PE limitation (1.3 lbs/hr). The uncontrolled emission factor of 5% (0.05) for lead was derived from FIRE 6.01 SCC 3-04-003-03. Compliance with this emission limitation may also be determined by multiplying the lead emission factor of 0.05 by the results of the particulate emission tests required pursuant to section A.V.2.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 12. Appropriate alternative U.S. EPA-approved methods may be used with prior approval from the Ohio EPA.

The annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

g. Emission Limitations:

Lead fugitive emissions shall not exceed 0.01 lb/hr and 0.04 ton/yr.

Applicable Compliance Methods:

Compliance with this emission limitation may be determined by multiplying the lead emission factor of 0.009 lb/ton by the emissions unit's maximum process weight rate of 7.5 tons/hr and by the efficiency of the capture system serving this emissions unit (1 - 0.90). The uncontrolled emission factor of 0.009 lb/ton for lead was derived from FIRE 6.01 SCC3-04-003-03.

The annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted no later than 6 months prior to permit expiration.

b. The emission testing shall be conducted to determine whether the outlet of baghouse #6 is in compliance with the allowable particulate emission limitations of 0.006 gr/dscf and 1.3 lbs/hr and to determine the exhaust gas flow rate [dry standard cubic feet per minute (dscf/min)] from the outlet of baghouse #6.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The tests shall be conducted while the emissions from emissions units P011, P022, and P023 are being vented to baghouse #6. The tests shall be conducted while the emissions units are operating at or near their maximum production capacities or as close to those capacities as is physically possible, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.

e. The following parameter shall also be monitored and recorded during the emission testing: the pressure differential across the fabric filter serving this emissions unit.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).

Personnel from the Canton City Health Department, Air Pollution Control Division 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.

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 Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s). The title page and the text of the report shall incorporate the Ohio EPA's identification (P011) for the emissions unit where applicable. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

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VI. Miscellaneous Requirements

1. The permittee shall comply with the approved preventative maintenance and malfunction abatement plan developed for the fabric filter serving this emissions unit (baghouse #6).

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Facility ID: 1576050200 Emissions Unit ID: P011 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576050200 Emissions Unit ID: P012 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pouring and cooling line controlled by a fabric filter (BACT fabric filter - Collector #5). The pouring line has full length side draft hoods and the cooling area has a series of hoods in place.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	See section A.I.2.c below.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 54.3 lbs/hr.

2. Additional Terms and Conditions

- a. The particulate emissions and/or PM10 emissions from the outlet of the fabric filter serving this emissions unit shall not exceed a concentration of 0.006 grain per dry standard cubic foot (gr/dscf). This emission limitation is applicable to this emissions unit pursuant to a provision in a Consent Order entered in September of 1999 (Case No. 1998CV02342, State of Ohio, ex rel. Montgomery v. Ohio Cast Products, Inc., in the Court of Commons Pleas, Stark County, Ohio). Incorporation of this emission limitation in the terms for this emissions unit, in part, allows the permittee to terminate the Consent Order.
- b. The emissions units vented to the BACT fabric filter - Collector #5 (emissions units P012 [Hunter pouring and cooling line], P901 [Didion drum and Sprue conveyor], and P902 [Hunter sand system and mold making]) shall not be disconnected from the BACT fabric filter - Collector #5 without prior written approval of the Director. This requirement is applicable to this emissions unit pursuant to a provision in a Consent Order entered in September of 1999 (Case No. 1998CV02342, State of Ohio, ex rel. Montgomery v. Ohio Cast Products, Inc., in the Court of Commons Pleas, Stark County, Ohio). Incorporation of this requirement in the terms for this emissions unit, in part, allows the permittee to terminate the Consent Order.
- c. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).
 At a minimum, the permittee's employment of RACM shall include the following:
 - i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, and vent the fugitive dust; and
 - ii. the collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of

fugitive dust at the point(s) of capture to the extent possible with good engineering design.

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II. Operational Restrictions

1. Except during startup and initial loading of filters following filter change, the pressure drop across the fabric filter shall be maintained within the range of 2 to 6 inches of water, while the emissions unit is in operation.

The manufacturer's recommended pressure drop range may be revised to more accurately reflect the fabric filter pressure drop range encountered during actual emissions unit(s) operating conditions that are in compliance with the applicable emission limitations. Any request to revise the pressure drop range shall be submitted in writing to the Canton City Health Department, Air Pollution Control Division. The request shall be accompanied by technical data that justifies the revision to the pressure drop range.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. 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 across the fabric filter on a once-per-shift basis.
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 the stack 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.

3. Persons responsible for making the visible emission observations required in section A.III.2 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter did not fall within the range specified above. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
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 and/or visible fugitive particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Particulate emissions and/or PM10 emissions shall not exceed 0.006 gr/dscf.
Particulate emissions shall not exceed 54.3 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

- b. Emission Limitation:
- Visible particulate emissions 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 by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
- c. Emission Limitation:
- Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.
- Applicable Compliance Method:
- If required, compliance shall be demonstrated by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 2 1/2 years after issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the gr/dscf and hourly particulate emission limitations.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- d. The tests shall be conducted while emissions units P012, P901 and P902 are operating at or near their maximum production capacities or as close to those capacities as is physically possible, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.
- e. The following parameter shall also be monitored and recorded during the emission testing: the pressure differential across the fabric filter serving this emissions unit. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).
- Personnel from the Canton City Health Department, Air Pollution Control Division 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.
- 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 Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s). The title page and the text of the report shall incorporate the Ohio EPA's identification (P012) for the emissions unit where applicable. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

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VI. **Miscellaneous Requirements**

1. The permittee shall comply with the approved preventative maintenance and malfunction abatement plan developed for the fabric filter serving this emissions unit (the BACT fabric filter - Collector #5).

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Facility ID: 1576050200 Emissions Unit ID: P012 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1576050200 Emissions Unit ID: P015 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall

not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1.2 MMBtu/hr natural gas-fired heat treat internal oil quench furnace	OAC rule 3745-31-05(A)(3) (PTI 15-1002)	Particulate emissions shall not exceed 0.02 lb/MMBtu of actual heat input, 0.024 lb/hr, and 0.10 ton/yr. Carbon monoxide (CO) emissions shall not exceed 0.02 lb/MMBtu of actual heat input, 0.024 lb/hr, and 0.10 ton/yr. Nitrogen oxides (NOx) emissions shall not exceed 0.10 lb/MMBtu of actual heat input, 0.12 lb/hr, and 0.53 ton/yr. Visible particulate emissions shall not exceed 5% opacity as a 3-minute average. Compliance with this rule also includes compliance with OAC rules 3745-18-06(E)(1), 3745-21-08(B), and 3745-23-06(B).
	OAC rule 3745-17-07(A)	See A.I.2.a below.
	OAC rule 3745 17-11(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	Sulfur dioxide (SO2) emissions shall not exceed 13.6 lbs/hr.
	OAC rule 3745-21-08(B)	See A.I.2.c below.
	OAC rule 3745-23-06(B)	See A.I.2.d below.

2. Additional Terms and Conditions

- a. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- b. The uncontrolled mass rate of particulate emissions* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

* The burning of natural gas is the only source of PE from this emissions unit.
- c. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 15-1002.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the 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 revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- d. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 15-1002.

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II. Operational Restrictions

- 1. The permittee shall burn only natural gas as fuel in this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

- 1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- 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 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. 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 eliminate the visible emissions.
3. Persons responsible for making the visible emission observations required in section A.III.2 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day that a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
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 and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall also submit annual reports that specify the total particulate, CO, and NOx emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Particulate emissions shall not exceed 0.02 lb/MMBtu of actual heat input, 0.024 lb/hr, and 0.10 ton/yr.

Applicable Compliance Methods:

Until the emission testing in section A.V.2 is completed, the permittee may determine compliance with the lb/MMBtu emission limitation by dividing the emission factor of 1.9 lbs of PE/mm cu. ft by the heat content of 1,035 Btu/cu. ft for natural gas. The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

Until the emission testing in section A.V.2 is completed, the permittee may determine compliance with the lb/hr emission limitation by multiplying the emission factor of 1.9 lbs of PE/mm cu. ft. by the emissions unit's maximum hourly fuel consumption rate (1,787 cu. ft./hr). The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

Compliance with the lb/MMBtu and lb/hr emission limitations shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. (See section A.V.2.)

The ton/yr emission limitation was established by multiplying the lb/hr emission limitation by the emissions unit's maximum operating schedule of 8,760 hours/year and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

Once the emission testing specified in section A.V.2 is completed, the permittee shall use the emissions unit-specific PE emission factor established during the emission testing in lieu of the PE emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors.

b. Emission Limitations:

CO emissions shall not exceed 0.02 lb/MMBtu of actual heat input, 0.024 lb/hr, and 0.10 ton/yr.

Applicable Compliance Methods:

Until the emission testing in section A.V.2 is completed, the permittee may determine compliance with the lb/MMBtu emission limitation by dividing the emission factor of 84 lbs CO/MMCF by the heat content of 1,035 Btu/cu. ft for natural gas. The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 (7/98).

Until the emission testing in section A.V.2 is completed, the permittee may determine compliance with the lb/hr emission limitation by multiplying the emission factor of 84 lbs CO/MMCF by the emissions unit's maximum hourly fuel consumption rate (1,787 cu. ft./hr). The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 (7/98).

Compliance with the lb/MMBtu and lb/hr emission limitations shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10. (See section

A.V.2.)

The ton/yr emission limitation was established by multiplying the lb/hr emission limitation by the emissions unit's maximum operating schedule of 8,760 hours/year and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

Once the emission testing specified in section A.V.2 is completed, the permittee shall use the emissions unit-specific CO emission factor established during the emission testing in lieu of the CO emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors.

c. Emission Limitations:

NOx emissions shall not exceed 0.10 lb/MMBtu of actual heat input, 0.12 lb/hr, and 0.53 ton/yr.

Applicable Compliance Methods:

Until the emission testing in section A.V.2 is completed, the permittee may determine compliance with the lb/MMBtu emission limitation by dividing the emission factor of 100 lbs NOx/MMCF by the heat content of 1,035 Btu/cu. ft for natural gas. The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 (7/98).

Until the emission testing in section A.V.2 is completed, the permittee may determine compliance with the lb/hr emission limitation by multiplying the emission factor of 100 lbs NOx/MMCF by the emissions unit's maximum hourly fuel consumption rate (1,787 cu. ft./hr). The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 (7/98).

Compliance with the lb/MMBtu and lb/hr emission limitations shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7. (See section A.V.2.)

The ton/yr emission limitation was established by multiplying the lb/hr emission limitation by the emissions unit's maximum operating schedule of 8,760 hours/year and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

Once the emission testing specified in section A.V.2 is completed, the permittee shall use the emissions unit-specific NOx emission factor established during the emission testing in lieu of the NOx emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors.

d. Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

e. Emission Limitation:

SO2 emissions shall not exceed 13.6 lbs/hr.

Applicable Compliance Method:

The SO2 emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials (iron castings) employed in this emissions unit do not generate SO2 emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 2 1/2 years after issuance of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the lb/MMBtu and hourly particulate, CO, and NOx emission limitations.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A; for NOx, Methods 1 through 4 and Method 7 of 40 CFR Part 60, Appendix A; and for CO, Methods 1 through 4 and Method 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The tests shall be conducted while this emissions unit is operating at or near its maximum production capacity or as close to that capacity as is physically possible, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.

e. The following parameter shall also be monitored and recorded during the emission testing: the emissions unit's natural gas firing rate.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).

Personnel from the Canton City Health Department, Air Pollution Control Division 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.

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 Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s). The title page and the text of the report shall incorporate the Ohio EPA's identification (P015) for the emissions unit where applicable. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576050200 Emissions Unit ID: P015 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1576050200 Emissions Unit ID: P016 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1.1 MMBtu/hr natural gas-fired heat treat internal oil quench furnace	OAC rule 3745-31-05(A)(3) (PTI 15-1113)	Nitrogen oxides (NOx) emissions shall not exceed 0.0429 lb/hr and 0.18 ton/yr. There shall be no visible particulate emissions from this emissions unit. Compliance with this rule also includes compliance with OAC rules 3745-18-06(E)(1), 3745-21-08(B), and 3745-23-06(B).
	OAC rule 3745-17-07(A)	See A.I.2.a below.
	OAC rule 3745 17-11(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	Sulfur dioxide (SO2) emissions shall not exceed 13.6 lbs/hr.
	OAC rule 3745-21-08(B)	See A.I.2.c below.
	OAC rule 3745-23-06(B)	See A.I.2.d below.

2. Additional Terms and Conditions

- a. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- b. The uncontrolled mass rate of particulate emissions* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

* The burning of natural gas is the only source of PE from this emissions unit.

- c. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 15-1113.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the 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 revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- d. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 15-1113.

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II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel in this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

1. For each day which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
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 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:
- the color of the emissions;
 - the total duration of any visible emission incident; and
 - any corrective actions taken to eliminate the visible emissions.
3. Persons responsible for making the visible emission observations required in section A.III.2 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.
4. The permittee shall document the total number of operating hours for this emissions unit each month.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day that a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
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 and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall also submit annual reports that specify the total operating hours for this emissions unit and the total NOx emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

NOx emissions shall not exceed 0.0429 lb/hr and 0.18 ton/yr.

Applicable Compliance Methods:

Until the emission testing in section A.V.2 is completed, the permittee may determine compliance with the lb/hr emission limitation by multiplying the emission factor of 94 lbs of NOx/mm cu. ft. by the emissions unit's maximum hourly fuel consumption rate (1,787 cu. ft./hr). The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 (2/98).

Compliance with the lb/hr emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7. (See section A.V.2.)

The ton/yr emission limitation was established by multiplying the lb/hr emission limitation by the emissions unit's actual operating schedule and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation and the annual operating hours submitted in the PTI application, compliance with the annual emission limitation will also be demonstrated.

Once the emission testing specified in section A.V.2 is completed, the permittee shall use the emissions unit-specific NOx emission factor established during the emission testing in lieu of the NOx emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors.

- b. Emission Limitation:
- There shall be no visible particulate emissions from this emissions unit.
- Applicable Compliance Method:
- If required, compliance shall be demonstrated by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.
- c. Emission Limitation:
- SO₂ emissions shall not exceed 13.6 lbs/hr.
- Applicable Compliance Method:
- The SO₂ emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials (iron castings) employed in this emissions unit do not generate SO₂ emissions during the heating process.
- Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.
- If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 2 1/2 years after issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with hourly NOx emission limitation.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s): for NOx, Methods 1 through 4 and Method 7 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- d. The tests shall be conducted while this emissions unit is operating at or near its maximum production capacity or as close to that capacity as is physically possible, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.
- e. The following parameter shall also be monitored and recorded during the emission testing: the emissions unit's natural gas firing rate.
- Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).
- Personnel from the Canton City Health Department, Air Pollution Control Division 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.
- 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 Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s). The title page and the text of the report shall incorporate the Ohio EPA's identification (P016) for the emissions unit where applicable. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1576050200 Emissions Unit ID: P016 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1576050200 Emissions Unit ID: P017 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Shotblasting operation using steel shot and controlled by a fabric filter (Pangborn fabric filter - Collector #2)	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 5.77 lbs/hr.
	OAC rule 3745-17-07(A)	See A.I.2.a below.
	OAC rule 3745-17-07(B)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-08(B)	Visible fugitive particulate emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average. See A.I.2.b below.

2. **Additional Terms and Conditions**

- a. Three emissions units have been grouped together because they are served by a common control device. The group contains emissions unit P001 (Shotblast #1), and four grinders from emissions unit P002 and emissions unit P017 (Shotblast #2), which are all controlled by the Pangborn fabric filter (Collector #2). The allowable particulate emissions rate was calculated from the uncontrolled mass rate of emissions (UMRE) determined during emission tests conducted on April 11, 1996 (35.35 lbs/hr UMRE) and applying Curve P-I of Figure II from OAC rule 3745-17-11.
- b. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following: local hooding over the emissions unit.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

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II. **Operational Restrictions**

1. Except during start-up and initial loading of the filters following a filter change, the pressure drop across the fabric filter serving this emissions unit shall be maintained within the range of 2.0 to 7.0 inches of water while the emissions unit is in operation.

The manufacturer's recommended pressure drop range may be revised to more accurately reflect the fabric filter pressure drop range encountered during actual emissions unit(s) operating conditions that are in compliance with the applicable emission limitations. Any request to revise the pressure drop range shall be submitted in writing to the Canton City Health Department, Air Pollution Control Division. The request shall be accompanied by technical data that justifies the revision to the pressure drop range.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. 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 across the fabric filter on a once-per-shift basis.
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 the stack 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:
- the location and color of the emissions;
 - whether the emissions are representative of normal operations;
 - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - the total duration of any visible emission incident; and
 - 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. Persons responsible for making the visible emission observations required in section A.III.2 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified above. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
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 and/or visible fugitive particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Particulate emissions shall not exceed 5.77 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.
 - b. Emission Limitation:

Visible particulate emissions from any 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, compliance shall be demonstrated by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - c. Emission Limitation:

Visible fugitive particulate emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 2 1/2 years after issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the hourly particulate emission limitation.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The fabric filter (Collector #2) shall be tested while collecting particulate emissions from the four bench and hand-held grinders (emissions unit P002), plus the particulate emissions from this emissions unit (P017) and emissions unit P001. All the process equipment venting particulate emissions to the fabric filter must be operating at or near their maximum production capacities or as close to the capacities as is physically possible, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.

e. The following parameter shall also be monitored and recorded during the emission testing: the pressure differential across the fabric filter serving this emissions unit.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).

Personnel from the Canton City Health Department, Air Pollution Control Division 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.

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 Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s). The title page and the text of the report shall incorporate the Ohio EPA's identification (P017) for the emissions unit where applicable. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

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VI. **Miscellaneous Requirements**

1. The permittee shall comply with the approved preventative maintenance and malfunction abatement plan developed for the fabric filter serving this emissions unit (the Pangborn fabric filter - Collector #2).

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Facility ID: 1576050200 Emissions Unit ID: P017 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576050200 Emissions Unit ID: P018 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
One piece cold box coremaking process (Laempe L-20) using a two part binder and catalyst system for the preparation of sand cores. The particulate emissions from the sand mixer are controlled with a fabric filter. There are no controls for the organic or particulate emissions from the coremaking machine.	OAC rule 3745-31-05(A)(3) (PTI 15-1122)	Methyl formate emissions from this emissions unit shall not exceed 6.18 lbs/hr and 12.35 tons/yr.
		Methyl formate usage in this emissions unit shall not exceed 16 lbs/hr, 2.6 tons/month, and 30.87 tons/yr.
		Particulate emissions from the fabric filter controlling the sand mixer shall not exceed 0.01 lb/hr and 0.04 ton/yr.
		See A.II.1 through A.II.3 below.
		Compliance with this rule also includes compliance with OAC rules 3745-17-07(A), 3745-17-07(B), and 3745-17-08(B).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-11(B)	See A.I.2.b below.
	OAC rule 3745-21-07(G)(2)	See A.I.2.c below.

2. **Additional Terms and Conditions**

- a. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).
- (a) At a minimum, the permittee's employment of RACM shall include the following: local hooding over the emissions unit.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of

fugitive dust at the point(s) of capture to the extent possible with good engineering design. (Also see A.II.1).

- b. The particulate emissions limitation specified by OAC rule 3745-17-11 is less stringent than the particulate emissions limitation established pursuant to the best available technology determination under OAC rule 3745-31-05(A)(3).
- c. The permittee shall not employ any photochemically reactive materials in this emissions unit, as defined in OAC rule 3745-21-01(C)(5).

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II. Operational Restrictions

1. Particulate emissions from the sand mixer shall be vented to a fabric filter with a control efficiency of at least 99%.
2. A sand heater shall be employed at the inlet to the Laempe machine to keep the sand at the recommended temperature to maximize the reaction efficiency and minimize emissions.
3. A minimum gassing time shall be determined for each job type. This time will be adhered to when making molds to reduce methyl formate emissions.
4. Except during start-up and initial loading of the filters following a filter change, the pressure drop across the fabric filter serving the sand mixer associated with this emissions unit shall be maintained within the range of 2.0 to 7.0 inches of water while the emissions unit is in operation.

The manufacturer's recommended pressure drop range may be revised to more accurately reflect the fabric filter pressure drop range encountered during actual emissions unit(s) operating conditions that are in compliance with the applicable emission limitations. Any request to revise the pressure drop range shall be submitted in writing to the Canton City Health Department, Air Pollution Control Division. The request shall be accompanied by technical data that justifies the revision to the pressure drop range.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter serving this emissions unit while the emissions unit is in operation. 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 across the fabric filter on a once-per-shift basis.
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 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. 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 eliminate the 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 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.
4. Persons responsible for making the visible emission observations required in section A.III.2 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.
5. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the company identification of each material employed, including bonding agents and core wash materials; and

- b. for each liquid organic material, documentation as to whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
- 6. The permittee shall properly operate and maintain equipment to continuously monitor the temperature of the sand at the inlet to the Laempe machine while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the inlet sand temperature once a shift when the emissions unit is in operation.
- 7. The permittee shall record the minimum and actual gassing times for each job type. The minimum gassing time shall be adhered to, for each casting, in the operation of this emissions unit.
- 8. The permittee shall record the amount of methyl formate used each hour and each month in this emissions unit, in pounds and tons, respectively.
- 9. The permittee shall maintain the following annual records:
 - a. the total number of hours the emissions unit was in operation;
 - b. the total amount of sand loaded into the day bin, in tons; and
 - c. the annual average hourly sand loading rate, in tons/hr.

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IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. each day during which any photochemically reactive material was employed;
 - b. an identification of each hour during which the usage of methyl formate exceeded 16 lbs/hr, and the actual usage of methyl formate during each such hour;
 - c. an identification of each month during which the usage of methyl formate exceeded 2.6 tons, and the actual usage of methyl formate during each such month;
 - d. all periods of time when the pressure drop across the fabric filter serving the sand mixer associated with this emissions unit did not comply with the range specified above; and
 - e. all periods of time during which the sand temperature at the inlet to the Laempe machine did not comply with the recommended temperature necessary to maximize the reaction efficiency and minimize emissions.
- 2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
- 3. 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 and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.
- 4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.
- 5. The permittee shall also submit annual reports that specify the total usage of methyl formate (in tons), and the total particulate and methyl formate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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V. Testing Requirements

- 1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
 - Visible particulate emissions 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 by performing visible particulate emission observations 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:
- Visible fugitive particulate emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average.
- Applicable Compliance Method:
- If required, compliance shall be demonstrated by performing visible particulate emission observations 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).
- c. Emission Limitations:
- Particulate emissions from the fabric filter controlling the sand mixer shall not exceed 0.01 lb/hr and 0.04 ton/yr.
- Applicable Compliance Methods:
- Compliance with the hourly emission limitation may be determined by multiplying the particulate emission factor of 0.29 lb/ton of sand by the average hourly sand loading rate, in tons/hr, and by the control efficiency of the fabric filter serving this emissions unit (1-.99). The AP-42 emission factor is from Table 11.12.2.
- If required, compliance with the hourly emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.
- Compliance with the annual emission limitation shall be calculated by multiplying the hourly emission limitation by the emissions unit's actual annual operating hours, and dividing by 2,000 lbs/ton.
- d. Emission Limitations:
- Methyl formate emissions from this emissions unit shall not exceed 6.18 lbs/hr and 12.35 tons/yr.
- Applicable Compliance Methods:
- Compliance with the hourly emission limitation may be determined using the following equation and assumptions:
- $$E = PWR \times RF \times CRF \times (1-RE)$$
- where:
(this is a typical example, permittee to use facility specific factors)
- E = emissions of methyl formate
PWR = maximum process weight rate of sand, 5,880 lbs/hr sand;
RF = resin (Beta Set) fraction of sand, 0.025 resin;
CRF = co-reactant Beta Cure (methyl formate) fraction of resin, 0.50 methyl formate; and
RE = reaction efficiency of methyl formate, 90%.
- Compliance with the hourly emission limitation shall be demonstrated based upon the emission testing requirements specified in section A.V.2.
- Compliance with the annual emission limitation shall be determined by multiplying the average hourly emission rate (from the emission tests required pursuant to section A.V.2) by the emissions unit's actual annual operating hours, and dividing by 2,000 lbs/ton.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 2 1/2 years after issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for methyl formate emissions.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for methyl formate, Methods 1 through 4 and Method 18 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- d. The tests shall be conducted while the emissions unit is operating at or near its maximum production capacity or as close to the capacity as is physically possible, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.
- e. The following parameter shall also be monitored and recorded during the emission testing: the pressure differential across the fabric filter serving this emissions unit.
Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).
- Personnel from the Canton City Health Department, Air Pollution Control Division 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.

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 Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s). The title page and the text of the report shall incorporate the Ohio EPA's identification (P018) for the emissions unit where applicable. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1576050200 Issuance type: Title V Proposed Permit

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Facility ID: 1576050200 Emissions Unit ID: P018 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
One piece cold box coremaking process (Laempe L-20) using a two part binder and catalyst system for the preparation of sand cores. The particulate emissions from the sand mixer are controlled with a fabric filter. There are no controls for the organic or particulate emissions from the coremaking machine.		See section B.III.1.

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The Permit To Install for this emissions unit (P018) was evaluated based on the actual materials (typical coremaking materials) and the design parameters of the emission unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA-approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl formate

TLV (ug/m3): 246,000

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,274

MAGLC (ug/m3): 5,857

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576050200 Emissions Unit ID: P022 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
4.0 tons/hr coreless electric induction furnace controlled by a fabric filter (baghouse #6).	OAC rule 3745-31-05(A)(3) (PTI 15-01402)	Particulate emissions shall not exceed 1.3 lbs/hr and 5.69 tons/yr. Fugitive particulate emissions shall not exceed 0.68 lb/hr and 2.96 tons/yr. PM10 stack emissions shall not exceed 1.3 lbs/hr and 5.69 tons/yr. PM10 fugitive emissions shall not exceed 0.65 lb/hr and 2.83 tons/yr. Lead stack emissions shall not exceed 0.06 lb/hr and 0.27 ton/yr. Lead fugitive emissions shall not exceed 0.01 lb/hr and 0.04 ton/yr.
	OAC rule 3745-17-07(A)	Compliance with this rule also includes compliance with OAC rules 3745-17-07(A), 3745-17-07(B), and 3745-17-08(B). Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)(1)	Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	See section A.I.2.c below.
	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).

2. **Additional Terms and Conditions**

- a. The particulate emissions and/or PM10 emissions from the outlet of the fabric filter serving this emissions unit shall not exceed a concentration of 0.006 grain per dry standard cubic foot (gr/dscf). This emission limitation is applicable to this emissions unit pursuant to a provision in a Consent Order entered in September of 1999 (Case No. 1998CV02342, State of Ohio, ex rel. Montgomery v. Ohio Cast Products, Inc., in the Court of Commons Pleas, Stark County, Ohio). Incorporation of this emission limitation in the terms for this emissions unit, in part, allows the permittee to terminate the Consent Order.
- b. The emissions units vented to baghouse #6 (emissions units P011 [Induction Furnace #1], P022 [Induction Furnace #2], and P023 [ductile inoculation operation]) shall not be disconnected from baghouse #6 without prior written approval of the Director. This requirement is applicable to this emissions unit pursuant to a provision in a Consent Order entered in September of 1999 (Case No. 1998CV02342, State of Ohio, ex rel. Montgomery v. Ohio Cast Products, Inc., in the Court of Commons Pleas, Stark County, Ohio). Incorporation of this requirement in the terms for this emissions unit, in part, allows the permittee to terminate the Consent Order.
- c. The permittee shall minimize or eliminate visible fugitive emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
 - i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust; and
 - ii. the collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

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II. **Operational Restrictions**

1. Except during startup and initial loading of filters following filter change, the pressure drop across the fabric filter shall be maintained within the manufacturer's recommended range of 2 to 8 inches of water, while the emissions unit is in operation.

The manufacturer's recommended pressure drop range may be revised to more accurately reflect the fabric filter pressure drop range encountered during actual emissions unit(s) operating conditions that are in compliance with the applicable emission limitations. Any request to revise the pressure drop range shall be submitted in writing to the Canton City Health Department, Air Pollution Control Division. The request shall be accompanied by technical data that justifies the revision to the pressure drop range.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter serving this emissions unit while the emissions unit is in operation. 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 across the fabric filter on a once-per-shift basis.
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 the stack 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 eliminate the visible emissions.
3. Persons responsible for making the visible emission observations required in section A.III.2 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified in section A.II.1. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
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 eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall also submit annual reports that specify the total stack and fugitive particulate/PM10 and stack and fugitive lead emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions 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 by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).
 - c. Emission Limitations:

Particulate emissions/PM10 stack emissions shall not exceed 0.006 gr/dscf, 1.3 lbs/hr (based on an airflow rate of 35,000 ACFM), and 5.69 tons/yr.

Applicable Compliance Methods:

Compliance with the gr/dscf and hourly emission limitations shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. See section A.V.2.

The annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

d. Emission Limitations:

Fugitive particulate emissions shall not exceed 0.68 lb/hr and 2.96 tons/yr.

Applicable Compliance Methods:

Compliance with this emission limitation may be determined by multiplying the AP-42 emission factor of 0.9 lb of particulate emissions/ton of iron melted by the emissions unit's maximum process weight rate of 7.5 tons/hr and by the efficiency of the capture system serving this emissions unit (1 - 0.90).

The annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

e. Emission Limitations:

PM10 fugitive emissions shall not exceed 0.65 lb/hr and 2.83 tons/yr.

Applicable Compliance Methods:

Compliance with this emission limitation may be determined by multiplying the AP-42 emission factor of 0.86 lb of PM10/ton of iron melted by the emissions unit's maximum process weight rate of 7.5 tons/hr and by the efficiency of the capture system serving this emissions unit (1 - 0.90).

The annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

f. Emission Limitations:

Lead stack emissions shall not exceed 0.06 lb/hr and 0.27 ton/yr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be determined by multiplying the lead emission factor of 0.05 by the allowable PE limitation (1.3 lbs/hr). The uncontrolled emission factor of 5% (0.05) for lead was derived from FIRE 6.01 SCC 3-04-003-03. Compliance with this emission limitation may also be determined by multiplying the lead emission factor of 0.05 by the results of the particulate emission tests required pursuant to section A.V.2.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 12. Appropriate alternative U.S. EPA-approved methods may be used with prior approval from the Ohio EPA.

The annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

g. Emission Limitations:

Lead fugitive emissions shall not exceed 0.01 lb/hr and 0.04 ton/yr.

Applicable Compliance Methods:

Compliance with this emission limitation may be determined by multiplying the lead emission factor of 0.009 lb/ton by the emissions unit's maximum process weight rate of 7.5 tons/hr and by the efficiency of the capture system serving this emissions unit (1 - 0.90). The uncontrolled emission factor of 0.009 lb/ton for lead was derived from FIRE 6.01 SCC3-04-003-03.

The annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted no later than 6 months prior to permit expiration.
- b. The emission testing shall be conducted to determine whether the outlet of baghouse #6 is in compliance

with the allowable particulate emission limitations of 0.006 gr/dscf and 1.3 lbs/hr and to determine the exhaust gas flow rate [dry standard cubic feet per minute (dscf/min)] from the outlet of baghouse #6.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The tests shall be conducted while the emissions from emissions units P011, P022, and P023 are being vented to baghouse #6. The tests shall be conducted while the emissions units are operating at or near their maximum production capacities or as close to those capacities as is physically possible, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.

e. The following parameter shall also be monitored and recorded during the emission testing: the pressure differential across the fabric filter serving this emissions unit.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).

Personnel from the Canton City Health Department, Air Pollution Control Division 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.

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 Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s). The title page and the text of the report shall incorporate the Ohio EPA's identification (P022) for the emissions unit where applicable. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

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VI. **Miscellaneous Requirements**

1. The permittee shall comply with the approved preventative maintenance and malfunction abatement plan developed for the fabric filter serving this emissions unit (baghouse #6).

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Facility ID: 1576050200 Emissions Unit ID: P022 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576050200 Emissions Unit ID: P023 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
ductile inoculation of iron controlled by a fabric filter (baghouse #6)	OAC rule 3745-31-05(A)(3) (PTI 15-01402)	Particulate emissions shall not exceed 0.56 lb/hr and 2.44 tons/yr. Fugitive particulate emissions shall not exceed 6 lbs/hr and 9.18 tons/yr. PM10 stack emissions shall not exceed 0.56 lb/hr and 2.44 tons/yr. PM10 fugitive emissions shall not exceed 6 lbs/hr and 9.18 tons/yr. Volatile organic compound (VOC) emissions shall not exceed 0.07 lb/hr and 0.11 ton/yr. VOC fugitive emissions shall not exceed 0.01 lb/hr and 0.01 ton/yr.
	OAC rule 3745-17-07(A)(1)	Compliance with this rule also includes compliance with OAC rules 3745-17-07(A), 3745-17-07(B), and 3745-17-08(B). Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as

OAC rule 3745-17-07(B)(1)	provided by the rule. Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.
OAC rule 3745-17-08(B)	See section A.I.2.c below.
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).

2. **Additional Terms and Conditions**

- a. The particulate emissions and/or PM10 emissions from the outlet of the fabric filter serving this emissions unit shall not exceed a concentration of 0.006 grain per dry standard cubic foot (gr/dscf). This emission limitation is applicable to this emissions unit pursuant to a provision in a Consent Order entered in September of 1999 (Case No. 1998CV02342, State of Ohio, ex rel. Montgomery v. Ohio Cast Products, Inc., in the Court of Commons Pleas, Stark County, Ohio). Incorporation of this emission limitation in the terms for this emissions unit, in part, allows the permittee to terminate the Consent Order.
- b. The emissions units vented to baghouse #6 (emissions units P011 [Induction Furnace #1], P022 [Induction Furnace #2], and P023 [ductile inoculation operation]) shall not be disconnected from baghouse #6 without prior written approval of the Director. This requirement is applicable to this emissions unit pursuant to a provision in a Consent Order entered in September of 1999 (Case No. 1998CV02342, State of Ohio, ex rel. Montgomery v. Ohio Cast Products, Inc., in the Court of Commons Pleas, Stark County, Ohio). Incorporation of this requirement in the terms for this emissions unit, in part, allows the permittee to terminate the Consent Order.
- c. The permittee shall minimize or eliminate visible fugitive emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
 - i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust; and
 - ii. the collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

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II. **Operational Restrictions**

1. Except during startup and initial loading of filters following filter change, the pressure drop across the fabric filter shall be maintained within the manufacturer's recommended range of 2 to 8 inches of water, while the emissions unit is in operation.

The manufacturer's recommended pressure drop range may be revised to more accurately reflect the fabric filter pressure drop range encountered during actual emissions unit(s) operating conditions that are in compliance with the applicable emission limitations. Any request to revise the pressure drop range shall be submitted in writing to the Canton City Health Department, Air Pollution Control Division. The request shall be accompanied by technical data that justifies the revision to the pressure drop range.
2. The amount of iron inoculated in any month shall not exceed 3,825 tons.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter serving this emissions unit while the emissions unit is in operation. 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 across the fabric filter on a once-per-shift basis.
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 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. 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 eliminate the 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 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.

- 4. Persons responsible for making the visible emission observations required in sections A.III.2 and A.III.3 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.
- 5. The permittee shall keep monthly records of the amount of iron inoculated, in tons.

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IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified in section A.II.1; and
 - b. any month in which the amount of iron inoculated exceeded 3,825 tons.

The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

- 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 and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.
- 3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.
- 4. The permittee shall also submit annual reports that specify the total stack and fugitive particulate/PM10 and stack and fugitive VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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V. Testing Requirements

- 1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions 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 by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).
 - c. Emission Limitations:

Particulate/PM10 emissions shall not exceed 0.006 gr/dscf, 0.56 lb/hr (based on an airflow rate of 15,000

acfm), and 2.44 tons/yr.

Applicable Compliance Methods:

Compliance with the gr/dscf and hourly emission limitations shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. See section A.V.2.

The annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

d. Emission Limitations:

Fugitive particulate/PM10 fugitive emissions shall not exceed 6 lbs/hr and 9.18 tons/yr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be determined by multiplying the AP-42 emission factor of 4 lbs of particulate/PM10/ton of iron inoculated by the emissions unit's maximum hourly iron inoculation rate (15 tons/hr), and by the efficiency of the capture system serving this emissions unit (1 - 0.90).

The annual emission limitation was established by multiplying the AP-42 emission factor of 4 lbs of particulate/PM10/ton of iron inoculated by the emission unit's restricted maximum monthly iron inoculation rate (3,825 tons), by the efficiency of the capture system serving this emissions unit (1 - 0.90), by 12 months/yr, and dividing by 2,000 lbs/ton.

e. Emission Limitations:

VOC emissions shall not exceed 0.07 lb/hr and 0.11 ton/yr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be determined by multiplying the Fire 6.23 SCC 3-04-003-10 emission factor of 0.005 lb of VOC/ton of iron inoculated by the emissions unit's maximum hourly inoculation rate (15 tons/hr), and by 0.9 (90% capture).

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

The annual emission limitation was established by multiplying the Fire 6.23 SCC 3-04-003-10 emission factor of 0.005 lb of VOC/ton of iron inoculated by the emission unit's restricted maximum monthly iron inoculation rate (3,825 tons), by 12 months/yr, and by 0.9 (90% capture), and then dividing by 2,000 lbs/ton.

f. Emission Limitations:

Fugitive VOC emissions shall not exceed 0.01 lb/hr and 0.01 ton/yr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be determined by multiplying the Fire 6.23 SCC 3-04-003-10 emission factor of 0.005 lb of VOC/ton of iron inoculated by the emissions unit's maximum hourly inoculation rate (15 tons/hr), and by the efficiency of the capture system serving this emissions unit (1 - 0.90).

The annual emission limitation was established by multiplying the Fire 6.23 SCC 3-04-003-10 emission factor of 0.005 lb of VOC/ton of iron inoculated by the emission unit's restricted maximum monthly iron inoculation rate (3,825 tons), by the efficiency of the capture system serving this emissions unit (1 - 0.90), by 12 months/yr, and then dividing by 2,000 lbs/ton.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted no later than 6 months prior to permit expiration.

b. The emission testing shall be conducted to determine whether the outlet of baghouse #6 is in compliance with the allowable particulate emission limitations of 0.006 gr/dscf and 0.56 lb/hr and to determine the exhaust gas flow rate [dry standard cubic feet per minute (dscf/min)] from the outlet of baghouse #6.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The tests shall be conducted while the emissions from emissions units P011, P022, and P023 are being vented to baghouse #6. The tests shall be conducted while the emissions units are operating at or near their maximum production capacities or as close to those capacities as is physically possible, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.

e. The following parameter shall also be monitored and recorded during the emission testing: the pressure differential across the fabric filter serving this emissions unit.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).

Personnel from the Canton City Health Department, Air Pollution Control Division 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.

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 Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s). The title page and the text of the report shall incorporate the Ohio EPA's identification (P023) for the emissions unit where applicable. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

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VI. **Miscellaneous Requirements**

1. The permittee shall comply with the approved preventative maintenance and malfunction abatement plan developed for the fabric filter serving this emissions unit (baghouse #6).

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Facility ID: 1576050200 Emissions Unit ID: P023 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576050200 Emissions Unit ID: P024 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Cold box Isocure coremaking process (Laempe L-5) using a two part binder and catalyst system for the preparation of sand cores. The particulate emissions from the sand mixer are controlled with a fabric filter. The organic and particulate emissions from the coremaking machine are controlled with a packed tower acid scrubber.	OAC rule 3745-31-05(A)(3) (PTI 15-1185)	Triethylamine emissions (includes both stack and fugitive emissions) shall not exceed 0.26 lb/hr and 0.54 ton/yr.
		Particulate emissions (includes both stack and fugitive emissions) shall not exceed 0.35 lb/hr and 0.15 ton/yr.
		Compliance with this rule also includes compliance with OAC rules 3745-17-07(A), 3745-17-07(B), 3745-17-08(B), and 3745-21-07(G).
		See sections A.I.2.a through A.I.2.e and A.II.1 through A.II.3 below.
		Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-07(B)	See section A.I.2.f below.
	OAC rule 3745-17-08(B)	See section A.I.2.c below.
	OAC rule 3745-21-07(G)(2)	

2. **Additional Terms and Conditions**

- a. The packed tower acid scrubber must have a control efficiency of at least 95%.
- b. Particulate emissions generated from the sand mixer shall be vented to a fabric filter with a control efficiency of at least 90%.
- c. The emissions unit core box shall have sufficient purge cycle duration to minimize odors from the manufactured mold cores.
- d. No open containers of triethylamine catalyst are permitted on the premises unless the emissions are

vented to the acid scrubber.

- e. Trained maintenance personnel shall be available, on each shift, to service the core machine and the acid scrubber.
- f. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following: local hooding over the emissions unit.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design. (Also see A.I.2.b).
- g. The permittee shall not employ any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5).

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II. Operational Restrictions

1. No more than 9,984 lbs of triethylamine catalyst shall be used during any calendar year.
2. This emissions unit is limited to operating no more than 4,160 hours during any calendar year.
3. The stack serving this emissions unit shall have a minimum height of 50 feet above grade level.
4. The only liquid catalyst used in this emissions unit shall be triethylamine.
5. Except during start-up and initial loading of the filters following a filter change, the pressure drop across the fabric filter serving the sand mixer shall be maintained within the range of 2.0 to 7.0 inches water gauge while the emissions unit is in operation.

The manufacturer's recommended pressure drop range may be revised to more accurately reflect the fabric filter pressure drop range encountered during actual emissions unit operating conditions that are in compliance with the applicable emission limitations. Any request to revise the pressure drop range shall be submitted in writing to the Canton City Health Department, Air Pollution Control Division. The request shall be accompanied by technical data that justifies the revision to the pressure drop range.
6. The pressure drop across the packed tower acid scrubber shall not exceed 2.0 inches of water gauge while the emissions unit is in operation.

The manufacturer's recommended maximum pressure drop value may be revised to more accurately reflect the packed tower acid scrubber maximum pressure drop value encountered during actual emissions unit operating conditions that are in compliance with the applicable emission limitations. Any request to revise the maximum pressure drop value shall be submitted in writing to the Canton City Health Department, Air Pollution Control Division. The request shall be accompanied by technical data that justifies the revision to the maximum pressure drop value.
7. The pH of the scrubbing liquor in the packed tower acid scrubber shall be maintained between 2.0 and 4.5 while the emissions unit is in operation.

The manufacturer's recommended pH range may be revised to more accurately reflect the packed tower acid scrubber pH range encountered during actual emissions unit operating conditions that are in compliance with the applicable emission limitations. Any request to revise the pH range shall be submitted in writing to the Canton City Health Department, Air Pollution Control Division. The request shall be accompanied by technical data that justifies the revision to the pH range.

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III. Monitoring and/or Record Keeping 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 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 eliminate the visible emissions.
2. Persons responsible for making the visible emission observations required in sections A.III.1 and A.III.2 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.
3. The permittee shall collect and record the following information each day for this emissions unit:

- a. the pressure drop across the fabric filter, in inches of water;
 - b. the packed tower acid scrubber pressure drop, in inches of water; and
 - c. the pH of the scrubbing liquor in the packed tower acid scrubber.
4. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification of each material employed, including bonding agents and core wash materials and mold release agents; and
 - b. for each liquid organic material, documentation as to whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
5. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total amount of triethylamine catalyst used, in lbs; and
 - b. the total number of hours the emissions unit was in operation.
6. The permittee shall operate and maintain equipment to monitor the pressure drop across the packed tower acid scrubber and the fabric filter serving this emissions unit. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendation, instructions and operating manuals.
7. The permittee shall operate and maintain equipment to monitor the pH of the scrubbing liquor in the packed tower acid scrubber. The monitoring device shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendation, instructions and operating manuals.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each day during which any photochemically reactive material was employed;
 - b. all periods of time when the pressure drop across the fabric filter serving the sand mixer associated with this emissions unit did not comply with the range specified above;
 - c. all periods of time when the pressure drop across the packed tower acid scrubber exceeded the value specified above; and
 - d. all periods of time when the pH of the scrubber liquor in the packed tower acid scrubber did not comply with the range specified above.

The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
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 eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall also submit annual reports that specify the total amount of triethylamine catalyst used, the total number of operating hours, and the total triethylamine and particulate emissions for this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions 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 by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:

Visible fugitive particulate emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

c. Emission Limitations:

Particulate emissions (includes both stack and fugitive emissions) shall not exceed 0.35 lb/hr and 0.15 ton/yr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be determined by summing the stack and fugitive particulate emissions for this emissions unit. The fugitive particulate component may be determined by multiplying the fugitive particulate emission factor of 0.35 lb of particulate emissions/ton of cores produced by the emissions unit's maximum hourly core production rate (1.00 ton of cores produced/hr - 1.0 ton equals the maximum amount of sand processed per hour) by the control system's capture efficiency (1-.99). The fugitive particulate emission factor is specified in Ohio EPA's RACM document, Section 2.8, Table 2.8-1. The stack particulate component may be determined by multiplying the fugitive particulate emission factor of 0.35 lb of particulate emissions/ton of cores produced by the emissions unit's maximum hourly core production rate (1.00 ton of cores produced/hr - 1.0 ton equals the maximum amount of sand processed per hour) by the percentage of the emissions vented to the control system (1-.01) and by the control efficiency of the fabric filter (1-.90).

If required, compliance with the hourly emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the fugitive particulate component, as calculated above.

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by the emissions unit's actual annual operating hours, and dividing by 2,000 lbs/ton.

d. Emission Limitations:

Triethylamine emissions (includes both stack and fugitive emissions) shall not exceed 0.26 lb/hr and 0.54 ton/yr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

Compliance with the annual emission limitation shall be calculated by multiplying the hourly emission limitation or the average hourly emission rate from the most recent test that demonstrated that the emissions unit was in compliance by the emissions unit's actual annual operating hours, and dividing by 2,000 lbs/ton.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 2 1/2 years after issuance of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for triethylamine emissions.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for triethylamine, Methods 1 through 4 and Method 18 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The tests shall be conducted while the emissions unit is operating at or near its maximum production capacity or as close to the capacity as is physically possible, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.

e. The following parameter shall also be monitored and recorded during the emission testing: the pressure differential across the fabric filter serving this emissions unit. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).

Personnel from the Canton City Health Department, Air Pollution Control Division 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.

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 Canton City Health Department, Air Pollution Control

Division within 30 days following completion of the test(s). The title page and the text of the report shall incorporate the Ohio EPA's identification (P024) for the emissions unit where applicable. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576050200 Emissions Unit ID: P024 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576050200 Emissions Unit ID: P025 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
One piece cold box coremaking process (Laempe L-20) using a two part binder and catalyst system for the preparation of sand cores. The particulate emissions from the sand mixer are controlled with a fabric filter. There are no controls for the organic or particulate emissions from the coremaking machine.	OAC rule 3745-31-05(A)(3) (PTI 15-1228)	Methyl formate emissions from this emissions unit shall not exceed 6.3 lbs/hr and 13.1 tons/yr.
		Methyl formate usage in this emissions unit shall not exceed 15.75 lbs/hr, 2.37 tons/month, and 32.75 tons/yr.
		Particulate emissions from the fabric filter controlling the sand mixer shall not exceed 0.04 lb/hr and 0.16 ton/yr.
		See A.II.1 through A.II.3 below.
		Compliance with this rule also includes compliance with OAC rules 3745-17-07(A), 3745-17-07(B), and 3745-17-08(B).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-11(B)	See A.I.2.b below.
	OAC rule 3745-21-07(G)(2)	See A.I.2.c below.

2. Additional Terms and Conditions

- a. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).
- (a) At a minimum, the permittee's employment of RACM shall include the following: local hooding over the emissions unit.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design. (Also see A.II.1).
- b. The particulate emissions limitation specified by OAC rule 3745-17-11 is less stringent than the particulate emissions limitation established pursuant to the best available technology determination under OAC rule 3745-31-05(A)(3).
- c. The permittee shall not employ any photochemically reactive materials in this emissions unit, as defined in OAC rule 3745-21-01(C)(5).

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II. Operational Restrictions

1. Particulate emissions from the sand mixer shall be vented to a fabric filter with a control efficiency of at least 99%.
2. A sand heater shall be employed at the inlet to the Laempe machine to keep the sand at the recommended temperature to maximize the reaction efficiency and minimize emissions.
3. A minimum gassing time shall be determined for each job type. This time will be adhered to when making molds to reduce methyl formate emissions.
4. Except during start-up and initial loading of the filters following a filter change, the pressure drop across the fabric filter serving the sand mixer associated with this emissions unit shall be maintained within the range of 2.0 to 7.0 inches of water while the emissions unit is in operation.

The manufacturer's recommended pressure drop range may be revised to more accurately reflect the fabric filter pressure drop range encountered during actual emissions unit(s) operating conditions that are in compliance with the applicable emission limitations. Any request to revise the pressure drop range shall be submitted in writing to the Canton City Health Department, Air Pollution Control Division. The request shall be accompanied by technical data that justifies the revision to the pressure drop range.

5. The stack serving this emissions unit shall have a minimum height of 40 feet above grade level.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter serving this emissions unit while the emissions unit is in operation. 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 across the fabric filter on a once-per-shift basis.
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 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. 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 eliminate the 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 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.

4. Persons responsible for making the visible emission observations required in sections A.III.2 and A.III.3 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.
5. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the company identification of each material employed, including bonding agents and core wash materials; and
 - b. for each liquid organic material, documentation as to whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
6. The permittee shall properly operate and maintain equipment to continuously monitor the temperature of the sand at the inlet to the Laempe machine while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the inlet sand temperature once a shift when the emissions unit is in operation.
7. The permittee shall record the minimum and actual gassing times for each job type. The minimum gassing time shall be adhered to, for each casting, in the operation of this emissions unit.
8. The permittee shall record the amount of methyl formate used each hour and each month in this emissions unit, in pounds and tons, respectively.

9. The permittee shall maintain the following annual records:
 - a. the total number of hours the emissions unit was in operation;
 - b. the total amount of sand loaded into the day bin, in tons; and
 - c. the annual average hourly sand loading rate, in tons/hr.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. each day during which any photochemically reactive material was employed;
 - b. an identification of each hour during which the usage of methyl formate exceeded 15.75 lbs/hr, and the actual usage of methyl formate during each such hour;
 - c. an identification of each month during which the usage of methyl formate exceeded 2.37 tons, and the actual usage of methyl formate during each such month;
 - d. all periods of time when the pressure drop across the fabric filter serving the sand mixer associated with this emissions unit did not comply with the range specified above; and
 - e. all periods of time during which the sand temperature at the inlet to the Laempe machine did not comply with the recommended temperature necessary to maximize the reaction efficiency and minimize emissions.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
3. 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 and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.
5. The permittee shall also submit annual reports that specify the total usage of methyl formate (in tons), and the total particulate and methyl formate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions 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 by performing visible particulate emission observations 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:

Visible fugitive particulate emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing visible particulate emission observations 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).
 - c. Emission Limitations:

Particulate emissions from the fabric filter controlling the sand mixer shall not exceed 0.04 lb/hr and 0.16 ton/yr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be determined by multiplying the particulate emission factor of 0.29 lb/ton of sand by the average hourly sand loading rate, in tons/hr, and by the control efficiency of the fabric filter serving this emissions unit (1-.99). The AP-42 emission factor is from Table 11.12.2.

If required, compliance with the hourly emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

Compliance with the annual emission limitation shall be calculated by multiplying the hourly emission limitation by the emissions unit's actual annual operating hours, and dividing by 2,000 lbs/ton.

d. Emission Limitations:

Methyl formate emissions from this emissions unit shall not exceed 6.3 lbs/hr and 13.1 tons/yr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be determined using the following equation and assumptions:

$$E = PWR \times RF \times CRF \times (1-RE)$$

where:

(this is a typical example, permittee to use facility specific factors)

E = emissions of methyl formate

PWR = maximum process weight rate of sand, 5,880 lbs/hr sand;

RF = resin (Beta Set) fraction of sand, 0.025 resin;

CRF = co-reactant Beta Cure (methyl formate) fraction of resin, 0.50 methyl formate; and

RE = reaction efficiency of methyl formate, 90%.

Compliance with the hourly emission limitation shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

Compliance with the annual emission limitation shall be determined by multiplying the average hourly emission rate (from the emission tests required pursuant to section A.V.2) by the emissions unit's actual annual operating hours, and dividing by 2,000 lbs/ton.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 2 1/2 years after issuance of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for methyl formate emissions.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for methyl formate, Methods 1 through 4 and Method 18 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The tests shall be conducted while the emissions unit is operating at or near its maximum production capacity or as close to the capacity as is physically possible, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.

e. The following parameter shall also be monitored and recorded during the emission testing: the pressure differential across the fabric filter serving this emissions unit.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).

Personnel from the Canton City Health Department, Air Pollution Control Division 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.

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 Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s). The title page and the text of the report shall incorporate the Ohio EPA's identification (P025) for the emissions unit where applicable. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1576050200 Emissions Unit ID: P025 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
One piece cold box coremaking process (Laempe L-20) using a two part binder and catalyst system for the preparation of sand cores. The particulate emissions from the sand mixer are controlled with a fabric filter. There are no controls for the organic or particulate emissions from the coremaking machine.		See section B.III.1.

2. **Additional Terms and Conditions**
 1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The Permit To Install for this emissions unit (P025) was evaluated based on the actual materials (typical coremaking materials) and the design parameters of the emission unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA-approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl formate
 TLV (ug/m3): 246,000
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,252
 MAGLC (ug/m3): 5,857

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV),

as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1576050200 Emissions Unit ID: P026 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1.2 MMBtu/hr natural gas-fired heat treat internal oil quench furnace	OAC rule 3745-31-05(A)(3) (PTI 15-1271)	Particulate emissions shall not exceed 0.024 lb/hr and 0.11 ton/yr. Carbon monoxide (CO) emissions shall not exceed

0.04 lb/hr and 0.18 ton/yr.

Nitrogen oxides (NOx) emissions shall not exceed 0.18 lb/hr and 0.79 ton/yr.

Organic compound (OC) emissions shall not exceed 1.75 lbs/hr and 7.67 tons/yr.

Compliance with this rule also includes compliance with OAC rules 3745-18-06(E)(1), 3745-21-08(B), and 3745-23-06(B).

- OAC rule 3745-17-07(A)
- OAC rule 3745-17-11(B)
- OAC rule 3745-18-06(E)(1)
- OAC rule 3745-21-08(B)
- OAC rule 3745-23-06(B)

- See section A.I.2.a below.
- See section A.I.2.b below.
- Sulfur dioxide (SO2) emissions shall not exceed 13.1 lbs/hr.
- See section A.I.2.c below.
- See section A.I.2.d below.

2. Additional Terms and Conditions

- a. This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- b. The uncontrolled mass rate of particulate emissions* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
 - * The burning of natural gas is the only source of particulate emissions from this emissions unit.
- c. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 15-1271.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the 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 revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- d. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 15-1271.

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II. Operational Restrictions

- 1. The permittee shall burn only natural gas as fuel in this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

- 1. For each day which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify each day that a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- 2. The permittee shall also submit annual reports that specify the total particulate, CO, NOx, and OC emissions, in tons, from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Particulate emissions shall not exceed 0.024 lb/hr and 0.11 ton/yr.

Applicable Compliance Methods:

Until the emission testing in section A.V.2 is completed, the permittee may determine compliance with the lb/hr emission limitation by multiplying the emission factor of 1.9 lbs of PE/mmcf. ft. by the emissions unit's maximum hourly fuel consumption rate (1,787 cu. ft./hr). The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

Compliance with the lb/hr emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. (See section A.V.2.)

The ton/yr emission limitation was established by multiplying the lb/hr emission limitation by the emissions unit's maximum operating schedule of 8,760 hours/year and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

Once the emission testing specified in section A.V.2 is completed, the permittee shall use the emissions unit-specific particulate emission factor established during the emission testing in lieu of the particulate emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors.
 - b. Emission Limitations:

CO emissions shall not exceed 0.04 lb/hr and 0.18 ton/yr.

Applicable Compliance Methods:

Until the emission testing in section A.V.2 is completed, the permittee may determine compliance with the lb/hr emission limitation by multiplying the emission factor of 84 lbs of CO/mmcf.ft. by the emissions unit's maximum hourly fuel consumption rate (1,787 cu. ft./hr). The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 (7/98).

Compliance with the lb/hr emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10. (See section A.V.2.)

The ton/yr emission limitation was established by multiplying the lb/hr emission limitation by the emissions unit's maximum operating schedule of 8,760 hours/year and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

Once the emission testing specified in section A.V.2 is completed, the permittee shall use the emissions unit-specific CO emission factor established during the emission testing in lieu of the CO emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors.
 - c. Emission Limitations:

NOx emissions shall not exceed 0.18 lb/hr and 0.79 ton/yr.

Applicable Compliance Methods:

Until the emission testing in section A.V.2 is completed, the permittee may determine compliance with the lb/hr emission limitation by multiplying the emission factor of 100 lbs of NOx/mmcf.ft. by the emissions unit's maximum hourly fuel consumption rate (1,787 cu. ft./hr). The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 (7/98).

Compliance with the lb/hr emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7. (See section A.V.2.)

The ton/yr emission limitation was established by multiplying the lb/hr emission limitation by the emissions unit's maximum operating schedule of 8,760 hours/year and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

Once the emission testing specified in section A.V.2 is completed, the permittee shall use the emissions unit-specific NOx emission factor established during the emission testing in lieu of the NOx emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors.
 - d. Emission Limitations:

OC emissions shall not exceed 1.75 lbs/hr and 7.67 tons/yr.

Applicable Compliance Methods:

Until the emission testing in section A.V.2 is completed, the permittee may determine compliance with the lb/hr emission limitation by multiplying the emission factor of 11.0 lbs of OC/mmcf. by the emissions unit's maximum hourly fuel consumption rate (1,787 cu. ft./hr). The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

Compliance with the lb/hr emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25. (See section A.V.2.)

The ton/yr emission limitation was established by multiplying the lb/hr emission limitation by the emissions unit's maximum operating schedule of 8,760 hours/year and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation will also be demonstrated.

Once the emission testing specified in section A.V.2 is completed, the permittee shall use the emissions unit-specific OC emission factor established during the emission testing in lieu of the OC emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors.

- e. Emission Limitation:
- SO2 emissions shall not exceed 13.1 lbs/hr.
- Applicable Compliance Method:
- The SO2 emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials (iron castings) employed in this emissions unit do not generate SO2 emissions during the heating process.
- Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.
- If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 2 1/2 years after issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the lb/MMBtu and hourly particulate, CO, NOx, and OC emission limitations.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A; for NOx, Methods 1 through 4 and Method 7 of 40 CFR Part 60, Appendix A; for CO, Methods 1 through 4 and Method 10 of 40 CFR Part 60, Appendix A; and for OC, Methods 1 through 4 and Method 25 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- d. The tests shall be conducted while this emissions unit is operating at or near its maximum production capacity or as close to that capacity as is physically possible, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.
- e. The following parameter shall also be monitored and recorded during the emission testing: the emissions unit's natural gas firing rate.
Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).
- Personnel from the Canton City Health Department, Air Pollution Control Division 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.
- 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 Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s). The title page and the text of the report shall incorporate the Ohio EPA's identification (P026) for the emissions unit where applicable. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576050200 Emissions Unit ID: P026 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1576050200 Emissions Unit ID: P027 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
One piece cold box coremaking process (Laempe L-20) using a two part binder and catalyst system for the preparation of sand cores. The particulate emissions from the sand mixer are controlled with a fabric filter. There are no controls for the organic or particulate emissions from the coremaking machine.	OAC rule 3745-31-05(A)(3) (PTI 15-1274)	Methyl formate emissions from this emissions unit shall not exceed 13.0 lbs/hr and 37.44 tons/yr.
		Methyl formate usage in this emissions unit shall not exceed 32.5 lbs/hr, 7.8 tons/month, and 93.6 tons/yr.
		Particulate emissions from the fabric filter controlling the sand mixer shall not exceed 0.01 lb/hr.
		Particulate emissions from the coremaking machine (including both stack and fugitive emissions) shall not exceed 0.44 lb/hr.
		Total particulate emissions from this emissions unit shall not exceed 1.29 tons/yr.
		Visible particulate emissions from any stack serving this emissions unit shall not exceed 10% opacity, as a 6-minute average.
		See A.II.1 through A.II.3 below.
	OAC rule 3745-17-07(A)	Compliance with this rule also includes compliance with OAC rules 3745-17-07(B) and 3745-17-08(B). The emission limitations specified in this rule are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	See A.I.2.a below.
	OAC rule 3745-17-11(B)	See A.I.2.b below.
	OAC rule 3745-21-07(G)(2)	See A.I.2.c below.

2. Additional Terms and Conditions

- a. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).
- (a) At a minimum, the permittee's employment of RACM shall include the following: local hooding over the emissions unit.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design. (Also see A.II.1).
- b. The particulate emission limitation specified by OAC rule 3745-17-11 is less stringent than the particulate emission limitation established pursuant to the best available technology determination under OAC rule 3745-31-05(A)(3).
- c. The permittee shall not employ any photochemically reactive materials in this emissions unit, as defined in OAC rule 3745-21-01(C)(5).

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II. Operational Restrictions

1. Particulate emissions from the sand mixer shall be vented to a fabric filter with a control efficiency of at least 98%.
2. A sand heater shall be employed at the inlet to the Laempe machine to keep the sand at the recommended temperature to maximize the reaction efficiency and minimize emissions.
3. A minimum gassing time shall be determined for each job type. This time will be adhered to when making molds to reduce methyl formate emissions.

4. Except during start-up and initial loading of the filters following a filter change, the pressure drop across the fabric filter serving the sand mixer associated with this emissions unit shall be maintained within the range of 2.0 to 7.0 inches of water while the emissions unit is in operation.

The manufacturer's recommended pressure drop range may be revised to more accurately reflect the fabric filter pressure drop range encountered during actual emissions unit(s) operating conditions that are in compliance with the applicable emission limitations. Any request to revise the pressure drop range shall be submitted in writing to the Canton City Health Department, Air Pollution Control Division. The request shall be accompanied by technical data that justifies the revision to the pressure drop range.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter serving this emissions unit while the emissions unit is in operation. 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 across the fabric filter on a once-per-shift basis.
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 the stack 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 eliminate the visible emissions.
3. Persons responsible for making the visible emission observations required in section A.III.2 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.
4. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the company identification of each material employed, including bonding agents and core wash materials; and
 - b. for each liquid organic material, documentation as to whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
5. The permittee shall properly operate and maintain equipment to continuously monitor the temperature of the sand at the inlet to the Laempe machine while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the inlet sand temperature once a shift when the emissions unit is in operation.
6. The permittee shall record the minimum and actual gassing times for each job type. The minimum gassing time shall be adhered to, for each casting, in the operation of this emissions unit.
7. The permittee shall record the amount of methyl formate used each hour and each month in this emissions unit, in pounds and tons, respectively.
8. The permittee shall maintain the following annual records:
 - a. the total number of hours the emissions unit was in operation;
 - b. the total amount of sand loaded into the day bin, in tons; and
 - c. the annual average hourly sand loading rate, in tons/hr.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. each day during which any photochemically reactive material was employed;
 - b. an identification of each hour during which the usage of methyl formate exceeded 32.5 lbs/hr, and the actual usage of methyl formate during each such hour;
 - c. an identification of each month during which the usage of methyl formate exceeded 7.8 tons, and the actual usage of methyl formate during each such month;
 - d. all periods of time when the pressure drop across the fabric filter serving the sand mixer associated with this emissions unit did not comply with the range specified above; and
 - e. all periods of time during which the sand temperature at the inlet to the Laempe machine did not comply with the recommended temperature necessary to maximize the reaction efficiency and minimize emissions.

2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.
3. 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 eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall also submit annual reports that specify the total usage of methyl formate (in tons), and the total particulate and methyl formate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 10% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing visible particulate emission observations in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.
 - b. Emission Limitation:

Visible fugitive particulate emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing visible particulate emission observations 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).
 - c. Emission Limitation:

Particulate emissions from the fabric filter controlling the sand mixer shall not exceed 0.01 lb/hr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be determined by multiplying the particulate emission factor of 0.29 lb/ton of sand by the average hourly sand loading rate, in tons/hr, and by the control efficiency of the fabric filter serving this emissions unit (1-.98). The AP-42 emission factor is from Table 11.12.2.

If required, compliance with the hourly emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.
 - d. Emission Limitation:

Particulate emissions from the coremaking machine (including both stack and fugitive emissions) shall not exceed 0.44 lb/hr.

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the fugitive particulate emission factor of 0.35 lb of particulate emissions/ton of cores produced by the emissions unit's maximum hourly core production rate (1.25 tons of cores produced/hr - 1.25 tons equals the maximum amount of sand processed per hour).
 - e. Emission Limitation:

Total particulate emissions from this emissions unit shall not exceed 1.29 tons/yr.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be calculated by multiplying the hourly emission limitations by the emissions unit's actual annual operating hours, and dividing by 2,000 lbs/ton.
 - f. Emission Limitations:

Methyl formate emissions from this emissions unit shall not exceed 13.0 lbs/hr and 37.44 tons/yr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be determined using the following equation and assumptions:

$$E = PWR \times RF \times CRF \times (1-RE)$$

where:
(this is a typical example, permittee to use facility specific factors)

E = emissions of methyl formate
PWR = maximum process weight rate of sand, 5,880 lbs/hr sand;
RF = resin (Beta Set) fraction of sand, 0.025 resin;
CRF = co-reactant Beta Cure (methyl formate) fraction of resin, 0.50 methyl formate; and
RE = reaction efficiency of methyl formate, 90%.

Compliance with the hourly emission limitation shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

Compliance with the annual emission limitation shall be determined by multiplying the average hourly emission rate (from the emission tests required pursuant to section A.V.2) by the emissions unit's actual annual operating hours, and dividing by 2,000 lbs/ton.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 2 1/2 years after issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for methyl formate emissions.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for methyl formate, Methods 1 through 4 and Method 18 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The tests shall be conducted while the emissions unit is operating at or near its maximum production capacity or as close to the capacity as is physically possible, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.

e. The following parameter shall also be monitored and recorded during the emission testing: the pressure differential across the fabric filter serving this emissions unit.
Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).

Personnel from the Canton City Health Department, Air Pollution Control Division 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.

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 Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s). The title page and the text of the report shall incorporate the Ohio EPA's identification (P027) for the emissions unit where applicable. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576050200 Emissions Unit ID: P027 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
One piece cold box coremaking process (Laempe L-20) using a two part binder and catalyst system for the preparation of sand cores. The particulate emissions from the sand mixer are controlled with a fabric filter. There are no controls for the organic or particulate emissions from the coremaking machine.		See section B.III.1.

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The Permit To Install for this emissions unit (P027) was evaluated based on the actual materials (typical coremaking materials) and the design parameters of the emission unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA-approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl formate

TLV (ug/m3): 246,000

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,252

MAGLC (ug/m3): 5,857

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1576050200 Emissions Unit ID: P030 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

i. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Laempe Core Making Machine L-20 Core Making Operation #5.	OAC rule 3745-31-05(A)(3) (PTI 15-1495) Issued 04/04/02	Methyl formate emissions from this emissions unit shall not exceed 7.31 lbs/hr and 32.01 tons/yr.
There are no stacks or control equipment for this emissions unit.		The volatile organic compound (VOC) emissions shall not exceed 7.71 lbs/hr and 33.77 tons/yr.
		Particulate emissions shall not exceed 0.34 lb/hr and 1.49 tons/yr.
		See A.I.2.a and A.I.2.b below.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-21-07(G)(2).
	OAC rule 3745-17-07(B)(1)	See A.I.2.c below.
	OAC rule 3745-17-08(B)	See A.I.2.d below.
	OAC rule 3745-21-07(G)(2)	See A.I.2.e below.

- 2. **Additional Terms and Conditions**

- a. Methyl formate usage shall not exceed the following limits:
 - (a)
 - i. 7.85 tons/month
 - ii. 94 tons/year
- b. Resin usage shall not exceed the following limits:
 - i. 15.7 tons/month
 - ii. 188 tons/year
- c. Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
- d. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). RACM has been determined to be no controls.
- e. The permittee shall not employ any photochemically reactive materials in this emissions unit, as defined in OAC rule 3745-21-01(C)(5).
- f. The 7.31 lbs/hr of methyl formate and 7.71 lbs/hr of VOC emission limitations for this emissions unit were established to reflect the hourly potentials to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

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II. Operational Restrictions

1. A sand heater shall be employed at the inlet to the Laempe machine to keep the sand at the recommended temperature to maximize the reaction efficiency and minimize emissions.
2. A minimum gassing time shall be determined for each job type. This time will be adhered to when making molds to reduce methyl formate emissions.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep a daily record of the amount, in pounds, of any photochemically reactive material employed in this emissions unit, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall properly operate and maintain equipment to continuously monitor the temperature of the sand at the inlet to the Laempe machine while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the inlet sand temperature once a shift when the emissions unit is in operation.
3. The permittee shall record the minimum and actual gassing times for each job type. The minimum gassing time shall be adhered to, for each casting, in the operation of this emissions unit.
4. The permittee shall record the amount of methyl formate and resin used each month in this emissions unit.
5. 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.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which any photochemically reactive material(s) was (were) employed.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each month during which the usage of methyl formate exceeds 7.85 tons, and the actual usage of methyl formate during each such month; and
 - b. an identification of each month during which the usage of resin exceeds 15.7 tons, and the actual usage of resin during each such month.
3. The permittee shall submit quarterly temperature deviation (excursion) reports that identify all periods of time during which the Laempe inlet temperature did not comply with the allowable range specified above.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
5. The permittee shall also submit annual reports that specify the total usage of methyl formate (in pounds), and the total particulate, VOC, and methyl formate emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
6. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

The particulate emissions shall not exceed 0.34 lb/hr and 1.49 tons/yr.

Applicable Compliance Method:

Emissions of particulates from core and mold sand unloading and storage may be calculated using the particulate emission factor of 0.03 lb PM/ton of cores X 1.65 tons/hr of sand = 0.05 lb/hr of particulate emissions.

Emissions of particulates from core sand and binder mixing may be calculated using the particulate emission factor of 0.3 lb PM/ton of cores X 1.65 tons/hr of sand = 0.5 lb/hr of particulate emissions.

Emissions of particulates from core making may be calculated using the particulate emission factor of 0.35 lb PM/ton of cores X 1.65 tons/hr of sand = 0.58 lb/hr of particulate emissions.

$0.05 + 0.5 + 0.58 = 1.13 \text{ lbs/hr} \times 0.3 \text{ (70\% building capture)} = 0.34 \text{ lb PM/hr}$
 $0.34 \text{ lb PM/hr} \times 8,760 \text{ hrs/yr} \times 1 \text{ ton}/2,000 \text{ lbs} = 1.49 \text{ tons PM/hr}$
 - b. Emission Limitations:

The VOC emissions shall not exceed 7.71 lbs/hr and 33.77 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements for the resin and methyl formate usage specified in section A.III.4 and the following calculations.

Emission factor is 0.00766 lb VOC/lb of resin [based on vendor (Borden) testing information for Beta Set/Beta Cure]. Maximum resin usage is 43 lbs/hr.

$0.00766 \text{ lb VOC/lb of resin} \times 43 \text{ lbs resin/hr} = 0.33 \text{ lb VOC/hr.}$

Emission factor is 0.34 lb VOC/lb of methyl formate [based on vendor (Borden) testing information for Beta Set/Beta Cure]. Maximum methyl formate usage is 21.5 lbs/hr.

$0.34 \text{ lb VOC/lb of methyl formate} \times 21.5 \text{ lbs methyl formate/hr} = 7.31 \text{ lbs VOC/hr}$

Core release = 0.07 lb VOC/hr

$0.33 \text{ lb/hr} + 0.731 \text{ lbs VOC/hr} + 0.07 \text{ lb VOC/hr} = 7.71 \text{ lbs VOC/hr}$

$7.71 \text{ lbs VOC/hr} \times 8,760 \text{ hrs/yr} \times 1 \text{ ton}/2,000 \text{ lbs} = 33.77 \text{ tons VOC/yr.}$
 - c. Emission Limitations:

The methyl formate emissions shall not exceed 7.31 lbs/hr and 32.01 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements for the amount of methyl formate usage specified in section A.III.4 and the following calculations.

Emission factor is 0.34 lb methyl formate/lb of methyl formate [based on vendor (Borden) testing information for Betaset/Beatcure]. Maximum methyl formate usage is 21.5 lbs/hr.

0.34 lb methyl formate/lb of methyl formate used x 21.5 lbs methyl formate/hr = 7.31 lbs methyl formate/hr.

7.31 lbs methyl formate/hr x 8,760 hrs/yr x 1 ton/2,000 lbs = 32.01 tons methyl formate/yr.

- d. Emission Limitation:
- Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
- Applicable Compliance Method:
- If required, compliance shall be demonstrated based upon the visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(3).
2. Compliance with the usage restrictions and operational limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
- a. Usage Restriction:
- Methyl formate usage shall not exceed the following limits:
- 7.85 tons/month and 94 tons/yr
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.4.
- b. Usage Restriction:
- Resin usage shall not exceed the following limits:
- 15.7 tons/month and 188 tons/yr.
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.4.

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VI. **Miscellaneous Requirements**

1. Revised OC/VOC Emissions Estimates:
- The Ohio EPA reserves the right to: (a) update the emissions factors used to estimate Organic Compound (OC) and Volatile Organic Compound (VOC) emissions and/or (b) redefine the actual and allowable OC/VOC emissions in this permit for the core and/or mold making process(es) at the facility.
- Upon written notification from the Ohio EPA concerning the identification and availability of updated and more representative OC/VOC emissions factors, the permittee may be required to reevaluate the estimated OC/VOC emissions from the core and/or mold making operation(s) using the updated emission factors. Should the updated emission factors indicate an increase in estimated OC and/or VOC emissions, the permittee shall submit the following (one copy to the Canton local air agency and one copy to the Ohio EPA, Division of Air Pollution Control, Engineering Section):
- Within sixty (60) days of receipt of the written notification from Ohio EPA, the permittee shall submit updated OC/VOC emissions estimates (maximum rate in lbs/hr and tons/yr) for each core and/or mold making operation covered under this permit, using the updated emission factors.

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Facility ID: 1576050200 Emissions Unit ID: P030 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Laempe Core Making Machine L-20 Core Making Operation #5.		See B.III.1 below.

There are no stacks nor control equipment for this emissions unit.

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The Permit To Install for this emissions unit (P030) was evaluated based on the actual materials (binders) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA-approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl formate

TLV (ug/m3): 266,000

Maximum Hourly Emission Rate (lbs/hr): 7.31

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,885

MAGLC (ug/m3): 6,333

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to

determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576050200 Emissions Unit ID: P901 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
sand shakeout includes Didion Drum and Sprue Conveyor controlled by baghouse # 5.	OAC rule 3745-31-05(A)(3) (PTI 15-1259)	Particulate stack emissions (PE/PM10) shall not exceed 2.11 lbs/hr and 6.07 tons/yr. Fugitive particulate emissions shall not exceed 3.38 lbs/hr and 8.61 tons/yr. PM10 fugitive emissions shall not exceed 2.37 lbs/hr and 6.03 tons/yr. Volatile organic compound (VOC) emissions shall not exceed 9.06 lbs/hr and 23.1 tons/yr. See A.I.2.c, A.II.1, and A.II.2 below. Compliance with this rule also includes compliance with OAC rules 3745-17-07(A), 3745-17-07(B), and 3745-17-08(B). Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as
	OAC rule 3745-17-07(A)	

OAC rule 3745-17-07(B)

provided by the rule.

Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

OAC rule 3745-17-08(B)

See A.I.2.d below.

OAC rule 3745-17-11(B)

The particulate emission limitation specified by this rule is less stringent than the particulate emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- a. The particulate emissions and/or PM10 emissions from the outlet of the fabric filter serving this emissions unit shall not exceed a concentration of 0.006 grain per dry standard cubic foot (gr/dscf). This emission limitation is applicable to this emissions unit pursuant to a provision in a Consent Order entered in September of 1999 (Case No. 1998CV02342, State of Ohio, ex rel. Montgomery v. Ohio Cast Products, Inc., in the Court of Commons Pleas, Stark County, Ohio). Incorporation of this emission limitation in the terms for this emissions unit, in part, allows the permittee to terminate the Consent Order.
- b. The emissions units vented to the BACT fabric filter - Collector #5 (emissions units P012 [Hunter pouring and cooling line], P901 [Didion drum and Spruce conveyor], and P902 [Hunter sand system and moldmaking]) shall not be disconnected from the BACT fabric filter - Collector #5 without prior written approval of the Director. This requirement is applicable to this emissions unit pursuant to a provision in a Consent Order entered in September of 1999 (Case No. 1998CV02342, State of Ohio, ex rel. Montgomery v. Ohio Cast Products, Inc., in the Court of Commons Pleas, Stark County, Ohio). Incorporation of this requirement in the terms for this emissions unit, in part, allows the permittee to terminate the Consent Order.
- c. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following:

 - i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, and vent the fugitive dust; and
 - ii. the collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

The RACM requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).
- d. This emissions unit shall be equipped with overhead duct hoods at the inlet and outlet of the shakeout drum. The PE/PM10 emissions from the conveyor section of this emissions unit need not be controlled (from PTI).

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1. The maximum annual operating time for this emissions unit shall not exceed 5,750 hours per rolling, 12-month period.
2. The maximum annual weight of castings processed in this emissions unit shall not exceed 76,500 tons per rolling, 12-month period.
3. Except during startup and initial loading of filters following filter change, the pressure drop across the fabric filter shall be maintained within the range of 2.0 to 7.0 inches of water, while the emissions unit is in operation.

The manufacturer's recommended pressure drop range may be revised to more accurately reflect the fabric filter pressure drop range encountered during actual emissions unit(s) operating conditions that are in compliance with the applicable emission limitations. Any request to revise the pressure drop range shall be submitted in writing to the Canton City Health Department, Air Pollution Control Division. The request shall be accompanied by technical data that justifies the revision to the pressure drop range.

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1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. 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 across the fabric filter on a once-per-shift basis.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the weight of metal castings processed, in tons;

- b. the total operating hours;
 - c. the rolling, 12-month summation of the weight of metal castings processed;
 - d. the rolling, 12-month summation of the hours of operation; and
 - e. a log or record of downtime for the control device and monitoring equipment when the associated emissions unit is in operation.
- 3. The permittee shall maintain daily records of the average hourly metal tonnage shaken out each day.
- 4. 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 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 eliminate the visible emissions.
- 5. Persons responsible for making the visible emission observations required in section A.III.4 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

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IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month operating hours limitation;
 - b. all exceedances of the rolling, 12-month weight of castings processed limitation; and
 - c. all periods of time during which the pressure drop across the fabric filter did not fall within the range specified above.

The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Terms and Conditions A.1.c.ii.
- 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 eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.
- 3. The permittee shall also submit annual reports that specify the total particulate (stack and fugitive), total PM10 stack, and total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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V. Testing Requirements

- 1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:
 - Particulate emissions and/or PM10 emissions shall not exceed 0.006 gr/dscf, PE/PM10 shall not exceed 2.11 lbs/hr and 6.07 tons/yr.
 - Applicable Compliance Methods:
 - Compliance with the gr/dscf and hourly emission limitations shall be demonstrated based upon the emission testing requirements specified in section A.V.2.
 - Compliance with the annual emission limitation shall be calculated by multiplying the hourly emission limitation or the average hourly emission rate from the most recent test that demonstrated that the emissions unit was in compliance by the emissions unit's actual annual operating hours and dividing by 2,000 lbs/ton.
 - b. Emission Limitations:
 - Fugitive particulate emissions shall not exceed 3.38 lbs/hr and 8.61 tons/yr.
 - Applicable Compliance Methods:

Compliance with the hourly emission limitation may be determined by multiplying the emissions unit's maximum hourly process weight rate (15 tons metal/hr) by the fugitive particulate emission factor of 45 lbs/ton of metal by the efficiency of the capture system serving this emissions unit (1-.995).

Compliance with the annual emission limitation shall be calculated by multiplying the hourly emission limitation by the emissions unit's actual annual operating hours and dividing by 2,000 lbs/ton.

- c. Emission Limitations:
- PM10 fugitive emissions shall not exceed 2.37 lbs/hr and 6.03 tons/yr.
- Applicable Compliance Method:
- Compliance with the hourly emission limitation may be demonstrated by multiplying the emissions unit's maximum hourly process weight rate (15 tons metal/hr) by the fugitive emission factor of 45 lbs PM10/ton of metal by the efficiency of the capture system serving this emissions unit (1-0.995) by the fraction of particulate matter less than 10 microns in diameter (0.7).
- Compliance with the annual emission limitation shall be demonstrated by multiplying the restricted maximum annual process weight rate (76,500 tons metal/yr) by the uncontrolled emission factor of 45 lbs of particulate/ton of metal by the efficiency of the capture system serving this emissions unit (1-0.995) by the fraction of particulate matter less than 10 microns in diameter (0.7) and dividing the product by 2,000 lbs/ton.
- d. Emission Limitations:
- VOC emissions shall not exceed 9.06 lbs/hr and 23.1 tons/yr.
- Applicable Compliance Methods:
- Compliance with the hourly emission limitation shall be demonstrated based upon the emission testing requirements specified in section A.V.2.
- Compliance with the annual emission limitation shall be calculated by multiplying the hourly emission limitation by the emissions unit's actual annual operating hours and dividing by 2,000 lbs/ton.
- e. Emission Limitation:
- Visible particulate emissions 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 by performing visible particulate emission observations 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).
- f. Emission Limitation:
- Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.
- Applicable Compliance Method:
- If required, compliance shall be demonstrated by performing visible particulate emission observations 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. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 2 1/2 years after issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates (gr/dscf and lbs/hr) and VOC (lbs/hr).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A, and for VOC, Methods 1 through 4 and Method 25 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- d. The tests shall be conducted while emissions units P012, P901, and P902 are operating at or near their maximum production capacities or as close to the capacities as is physically possible, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.
- e. The following parameter shall also be monitored and recorded during the emission testing: the pressure differential across the fabric filter serving this emissions unit.
Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).

Personnel from the Canton City Health Department, Air Pollution Control Division 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.

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 Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s). The title page and the text of the report shall incorporate the Ohio EPA's identification (P901) for the emissions unit where applicable. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

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VI. **Miscellaneous Requirements**

1. The permittee shall comply with the approved preventative maintenance and malfunction abatement plan developed for the fabric filter serving this emissions unit (the BACT fabric filter - Collector #5).

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Facility ID: 1576050200 Emissions Unit ID: P901 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576050200 Emissions Unit ID: P902 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Hunter sand system (formerly F003) and moldmaking (formerly Z002) controlled by baghouse #5 and a wet scrubber.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	See A.I.2.c below.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 53.13 lbs/hr.

2. **Additional Terms and Conditions**

- a. The particulate emissions and/or PM10 emissions from the outlet of the fabric filter serving this emissions unit shall not exceed a concentration of 0.006 grain per dry standard cubic foot (gr/dscf). This emission limitation is applicable to this emissions unit pursuant to a provision in a Consent Order entered in September of 1999 (Case No. 1998CV02342, State of Ohio, ex rel. Montgomery v. Ohio Cast Products, Inc., in the Court of Commons Pleas, Stark County, Ohio). Incorporation of this emission limitation in the terms for this emissions unit, in part, allows the permittee to terminate the Consent Order.
- b. The emissions units vented to the BACT fabric filter - Collector #5 (emissions units P012 [Hunter pouring and cooling line], P901 [Didion drum and Sprue conveyor], and P902 [Hunter sand system and moldmaking]) shall not be disconnected from the BACT fabric filter - Collector #5 without prior written approval of the Director. This requirement is applicable to this emissions unit pursuant to a provision in a Consent Order entered in September of 1999 (Case No. 1998CV02342, State of Ohio, ex rel. Montgomery v. Ohio Cast Products, Inc., in the Court of Commons Pleas, Stark County, Ohio). Incorporation of this requirement in the terms for this emissions unit, in part, allows the permittee to terminate the Consent Order.
- c. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following:
 - i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, and vent the fugitive dust; and
 - ii. the collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- d. The efficiency of the particulate capture system serving this emissions unit shall not be less than 90.0%.

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II. **Operational Restrictions**

1. Except during startup and initial loading of filters following filter change, the pressure drop across the fabric filter shall be maintained within the range of 2.0 to 7.0 inches of water, while the emissions unit is in operation.

The manufacturer's recommended pressure drop range may be revised to more accurately reflect the fabric filter pressure drop range encountered during actual emissions unit(s) operating conditions that are in compliance with the applicable emission limitations. Any request to revise the pressure drop range shall be submitted in writing to the Canton City Health Department, Air Pollution Control Division. The request shall be accompanied by technical data that justifies the revision to the pressure drop range.

2. Except during startup, the wet scrubber water supply pressure shall be maintained at a value not less than 30 pounds per square inch gauge (psig) while the emissions unit is in operation.

Except during startup, the wet scrubber water flow rate shall be continuously maintained at a value of not less than 350 gallons per minute (gpm) while the emissions unit is in operation.

Except during startup, the differential pressure drop across the wet scrubber (flange to flange) shall be maintained within the range of 5.5 to 7.0 inches of water while the emissions unit is in operation.

The wet scrubber manufacturer's recommended minimum water supply pressure value, minimum water flow rate value, and pressure drop range across the wet scrubber may be revised to more accurately reflect the minimum water supply pressure, minimum water flow rate, and pressure drop range across the wet scrubber encountered during actual emissions unit(s) operating conditions that are in compliance with the applicable emission limitations. Any request to revise the minimum water supply pressure, minimum water flow rate, and/or pressure drop range across the wet scrubber shall be submitted in writing to the Canton City Health Department, Air Pollution Control Division. The request shall be accompanied by technical data that justifies the revision to the minimum water supply pressure, minimum water flow rate, and/or pressure drop range across the wet scrubber.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. 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 across the fabric filter on a once-per-shift basis.
2. The permittee shall properly operate and maintain equipment to monitor the water supply pressure, water flow rate, and differential pressure drop across the wet scrubber while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

3. The permittee shall collect and record the following information each shift:
 - a. the wet scrubber water supply pressure, in psig;
 - b. the wet scrubber water flow rate, in gpm;
 - c. the differential pressure drop across the wet scrubber, in inches of water; and
 - d. a log or record of the downtime for the capture (collection) system, control devices, and monitoring equipment when the associated emissions unit was in operation.

4. 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 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.

5. Persons responsible for making the visible emission observations required in section A.III.4 shall be familiar with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all periods of time during which the pressure drop across the fabric filter did not fall within the range specified above;
 - b. all periods of time during which the wet scrubber water flow rate was not maintained at or above the level specified above;
 - c. all periods of time during which the wet scrubber water supply pressure was not maintained at or above the level specified above; and
 - d. all periods of time during which the pressure drop across the wet scrubber did not fall within the range specified above.

The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Terms and Conditions A.1.c.ii.
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 and/or visible fugitive particulate emissions. These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. **Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Particulate emissions and/or PM10 emissions shall not exceed 0.006 gr/dscf.
Particulate emissions shall not exceed 53.13 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.
 - b. Emission Limitation:

Visible particulate emissions 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 by performing visible particulate emission observations 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).
 - c. Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing visible particulate emission observations 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. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 2 1/2 years after issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates (gr/dscf and lbs/hr).
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The tests shall be conducted while emissions units P012, P901, and P902 are operating at or near their maximum production capacities or as close to the capacities as is physically possible, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division.

- e. The following parameters shall also be monitored and recorded during the emission testing: the pressure differential across the fabric filter and the wet scrubber serving this emissions unit, the wet scrubber water supply pressure, in psig, and the wet scrubber water flow rate, in gpm.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).

Personnel from the Canton City Health Department, Air Pollution Control Division 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.

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 Canton City Health Department, Air Pollution Control Division within 30 days following completion of the test(s). The title page and the text of the report shall incorporate the Ohio EPA's identification (P902) for the emissions unit where applicable. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton City Health Department, Air Pollution Control Division.

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VI. Miscellaneous Requirements

- 1. The permittee shall comply with the approved preventative maintenance and malfunction abatement plan developed for the fabric filter serving this emissions unit (the BACT fabric filter - Collector #5).

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Facility ID: 1576050200 Emissions Unit ID: P902 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576050200 Emissions Unit ID: Z015 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
core wash operations	OAC rule 3745-21-07(G)	See A.I.2.a below.
2. Additional Terms and Conditions		
a. The permittee shall not employ any photochemically reactive materials in this emissions unit, as defined in OAC rule 3745-21-01(C)(5).		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information each month:
 - a. the company identification of each liquid organic material employed in this emissions unit, and
 - b. whether or not each liquid organic material employed is a photochemically reactive material.

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IV. **Reporting Requirements**

- 1. The permittee shall submit deviation reports that identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Canton City Health Department, Air Pollution Control Division within 30 days of the deviation.

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576050200 Emissions Unit ID: Z015 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None