



State of Ohio Environmental Protection Agency

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7/18/2008

Certified Mail

Heather Klesch
Clow Water Systems Company
P. O. Box 6001
2266 South Sixth Street
Coshocton (Tuscarawas Twp, OH 43812-6001

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0616010006
Permit Number: 06-07432
Permit Type: Chapter 31 mod
County: Coshocton

No	TOXIC REVIEW
Yes	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Tribune. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-SEDO; West Virginia

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

PUBLIC NOTICE
 Issuance Of Draft Air Pollution Permit-To-Install
 Clow Water Systems Company

Issue Date: 7/18/2008
 Permit Number: 06-07432
 Permit Type: Chapter 31 mod
 Permit Description: PSD permit for emissions increases resulting from modifications of cupola (P901) in 1989 and 1998; includes synthetic minor restrictions for several supporting emissions units
 Facility ID: 0616010006
 Facility Location: Clow Water Systems Company
 P. O. Box 6001, 2266 South Sixth Street
 Coshocton (Tuscarawas Twp, OH 43812-6001)
 Facility Description: Iron Foundries

Public Notice is hereby given that the Staff of the Ohio Environmental Protection Agency (EPA) has recommended to the Director that Ohio EPA issue a draft action of a Permit to Install (PTI) to Clow Water Systems (Clow) in Coshocton County, Ohio.

This draft permit proposes to retroactively modify a cupola in Coshocton, Ohio. The project will include the expansion of a cupola and federally enforceable decreases in potential to emit air pollution of several other pieces of equipment at the facility. The allowable emissions are in tons per year:

<u>Pollutant</u>	<u>Tons Per Year</u>
NO _x	91.74
PM ₁₀	59.84
SO ₂	2.23
VOC	57.45
CO	127.81

This facility is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by U.S. EPA (40 CFR 52.21).

Pollutant	Averaging Period	PSD Significant Impact Increment ($\mu\text{g}/\text{m}^3$)	Distance (km)
PM ₁₀	24-hour	5	3.7
	Annual	1	2.8
NO _x	Annual	1	1.5

A draft action (permit no. 06-07432) was issued on June 18, 2008. Within 30 days from the date of this notice, any interested party may submit comments or request a public hearing. Comments are to be sent to Kimbra Reinbold, Ohio Environmental Protection Agency, Southeast District Office, 2195 Front Street, Logan, Ohio 43138.

Further information concerning this application, which is available for public inspection, may be secured from Kimbra Reinbold at the Ohio Environmental Protection Agency, Southeast District Office at the above address during normal business hours. Telephone number: (740) 385-8501.

**STAFF DETERMINATION FOR THE APPLICATION TO CONSTRUCT
UNDER THE PREVENTION OF SIGNIFICANT DETERIORATION REGULATIONS
FOR CLOW WATER SYSTEMS COMPANY
COSHOCOTON, OHIO
PTI NUMBER 06-07432**

June 30, 2008

Ohio Environmental Protection Agency
Division of Air Pollution Control
Lazarus Government Center
122 South Front Street
Columbus, Ohio 43215

The Clean Air Act and regulations promulgated thereunder require that major air pollution sources undergoing construction or modification comply with all applicable Prevention of Significant Deterioration (PSD) provisions and nonattainment area New Source Review requirements. The federal PSD rules govern emission increases in attainment areas for major sources, which are sources with the potential to emit 250 tons per year or more of any pollutant regulated under the Clean Air Act, or 100 tons per year or more if the source is included in one of 28 source categories. In nonattainment areas, the definition of major source is one having at least 100 tons per year potential emissions. A major modification is one resulting in a contemporaneous increase in emissions which exceeds the significance level of one or more pollutants. Any changes in actual emissions within a five-year period are considered to be contemporaneous. In addition, Ohio now has incorporated the PSD and NSR requirements by rule under OAC 3745-31.

Both PSD and nonattainment rules require that certain analyses be performed before a facility can obtain a permit authorizing construction of a new source or major modification to a major source. The principal requirements of the PSD regulations are:

- 1) Best Available Control Technology (BACT) review - A detailed engineering review must be performed to ensure that BACT is being installed for the pollutants for which the new source is a major source.
- 2) Ambient Air Quality Review - An analysis must be completed to ensure the continued maintenance of the National Ambient Air Quality Standards (NAAQS) and that any increases in ambient air pollutant concentrations do not exceed the incremental values set pursuant to the Clean Air Act.

For nonattainment areas, the requirements are:

- 1) Lowest Achievable Emissions Rate (LAER) - New major sources must install controls that represent the lowest emission levels (highest control efficiency) that has been achieved in practice.
- 2) The emissions from the new major source must be offset by a reduction of existing emissions of the same pollutant by at least the same amount, and a demonstration must be made that the resulting air quality shows a net air quality benefit. This is more completely described in the Emission Offset Interpretative Ruling as found in Appendix S of 40 CFR Part 51.

- 3) The facility must certify that all major sources owned or operated in the state by the same entity are either in compliance with the existing State Implementation Plan (SIP) or are on an approved schedule resulting in full compliance with the SIP.

For rural ozone nonattainment areas, the requirements are:

- 1) LAER - New major sources must install controls that represent the lowest emissions levels (highest control efficiency) that has been achieved in practice.
- 2) The facility must certify that all major sources owned or operated in the state by the same entity are either in compliance with the existing SIP or are on an approved schedule resulting in full compliance with the SIP.

Finally, New Source Performance Standards (NSPS), SIP emission standards and public participation requirements must be followed in all cases.

Site Description

The facility is in Coshocton, Ohio, which is located in Coshocton County. This area is classified as attainment for all of the criteria pollutants, particulate matter less than 10 microns, sulfur dioxide, nitrogen oxides, carbon monoxide, and volatile organic compounds (ozone). This area is classified as non-attainment for PM-2.5.

Facility Description and Project Introduction

Clow Water Systems Company (Clow) operates a facility which produces ductile iron pipe. Clow has modified in a significant manner its 85 TPY cupola furnace twice at its facility located at 2266 South Sixth Street, Coshocton, Ohio 43812. Clow did not apply PSD permits for either modification. The modifications occurred in 1989 and 1998. In 1989 Clow installed a new hot blast component to the cupola which resulted in a significant emissions increase. In 1998 Clow increased the cross sectional diameter of the cupola which resulted in a significant emissions increase.

New Source Review (NSR)/PSD Applicability

This process will generate criteria pollutant emissions of particulate, NO_x, SO₂, CO, and VOC. For PSD purposes, the Clow Water Systems facility is considered a major facility. A PSD analysis is required for any increase in emissions of a pollutant exceeding the PSD threshold emissions level, or of significance levels. The pollutants PM₁₀, VOC and NO_x will result in a net increase above PSD significant levels. PM-2.5 will be examined through PM-10; however, PM-2.5 was not a criteria pollutant at the time of the emissions increase.

The National Ambient Air Quality Standards (NAAQS) have been violated by the continued operation of this equipment (the cupola). Clow has chosen to permit pre-1974 sources in order to restrict the facility-wide potential to emit through federally enforceable limits to a level that does not continue to violate the NAAQS.

Clow has taken restrictions to alleviate the facility of requirements in MACT and avoid triggering significant thresholds for VOC. The facility's cupola is not subject to 40 CFR Part 63 Subpart EEEEE, a proposed MACT.

Short term emissions from the cupola are based upon worst case operating conditions. The annual emissions are based on pounds per hour emissions at average operating conditions at 8760 hours while taking into account the throughput restriction of 275,000 tons per year.

TABLE 1

PRELIMINARY POLLUTANT EMISSION RATES
MODIFICATION TO INCREASE EMISSION RATES
Clow Water Systems

<u>AIR POLLUTANT</u>	<u>TOTAL TPY INCREASE</u>	<u>TOTAL TPY ALLOWABLE</u>	<u>PSD THRESHOLD</u>
NO _x	91.74	91.74	40
PM ₁₀	26.13	59.84	15
SO ₂	11.55	2.23	40
VOC	37.13	57.45	40
CO	70.13	127.81	100

Control Technology Review

As part of the application for any source regulated under the PSD requirements, an analysis must be conducted that demonstrates that Best Available Control Technology (BACT) will be employed by the source. The Clow facility is subject to PSD regulations which mandate a case-by-case BACT analysis be performed for PSD triggering pollutants. The application used a "top-down" approach to determine the latest demonstrated control techniques and select an appropriate level of control.

The basic steps to be followed are:

Identify all available potential control options;

Eliminate technically infeasible options;

Rank remaining technologies by control effectiveness;

Evaluate the feasible controls by performance and cost analysis; and

Select the most effective control based on energy, environmental and economic impacts (generally, the feasible technology that is also considered to be cost effective).

PM/PM10

Two technologies were evaluated for control of PM/PM10 emissions. The following table summarizes the results of the evaluation for BACT of the cupola. The BACT/LAER Clearinghouse was consulted and the following controls were chosen to be the only controls used on a cupola.

PM/PM10 Control	Description
Baghouse	This add-on control was found to be feasible. Since the control is feasible, a cost effective analyses has been performed. The outcome of the analysis was a control cost of more than \$14,000 per ton of material throughput. Due to the costs involved this control was determined to be cost ineffective.
High Energy Venturi Wet Scrubber	This technology is the next best control option. It can achieve 98.5 removal efficiency. This is within the range of recent acceptable BACT limits in the RACT/BACT Clearinghouse. This control option was chosen to be BACT for the cupola.

VOC

Particulate emissions (PM/PM10) were the only significant emissions. PM/PM10 emissions result from incomplete fuel combustion. Two technologies were evaluated for control of PM/PM10 emissions. The following table summarizes the results of the evaluation for BACT of the cupola. The BACT/LAER Clearinghouse was consulted and the following controls were chosen to be the only controls used on a cupola.

VOC Control	Description
Afterburner	This technology is the technology typically used on cupolas for VOC control.

NOx

Particulate emissions (PM/PM10) were the only significant emissions. PM/PM10 emissions result from incomplete fuel combustion. Two technologies were evaluated for control of PM/PM10 emissions. The following table summarizes the results of the evaluation for BACT of the cupola. The BACT/LAER Clearinghouse was consulted and the following controls were chosen to be the only controls used on a cupola.

NOx Control	Description
Selective Catalytic Oxidation	The particulate on the “dirty side” of the particulate control equipment would interfere with the catalyst. Additionally, the varying rate of NOx emissions during a melt cycle would be difficult to manage in a timely matter. These two conditions make this control technically infeasible.
Selective Non-catalytic Oxidation	The particulate on the “dirty side” of the particulate control equipment would interfere with the catalyst. Additionally, the varying rate of NOx emissions during a melt cycle would be difficult to manage in a timely matter. These two conditions make this control technically infeasible.

Low-NOx Burners	This technology is the technology typically used on cupolas for NOx control.
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Ambient Air Quality Monitoring Requirements

The proposed Clow facility would be located in AQCR 183. The area is attainment for all criteria pollutants. U.S. EPA regulations require the establishment of baseline air quality in the vicinity of the proposed project. This is normally accomplished using representative air quality monitoring data. Air quality monitoring can be utilized to demonstrate that the project will have less than a threshold impact. This threshold impact is identified as the PSD monitoring de minimus level. If the projected impact from the proposed project exceeds this level, ambient data must be collected or existing representative data must be identified.

Clow has conducted ambient air quality modeling to determine the potential impact due to the proposed installation. The following are the projected impacts:

Pollutant	Averaging Period	Predicted Concentration	Monitoring De minimus Concentration
PM ₁₀	24-hour	24.7 ug/m ³	10 ug/m ³
NOx	Annual	2.4 ug/m ³	14ug/m ³

Predicted impacts exceed the monitoring threshold for PM₁₀ but not for NOx. However, Ohio EPA has identified existing ambient data which it judged to be representative of the current air quality within the impact area of the Clow facility. Therefore, Clow would or would not be required to conduct pre-construction monitoring.

Modeling

Air quality dispersion modeling was conducted to assess the effect of this modification on the national ambient air quality standards (NAAQS) and PSD increments. ISCST3 (version 02035) was used in the regulatory default, urban mode. Five years of meteorological data (XXXXX/XXXX), 1997-2002) were used. Additional modeling using CTSCREEN (version 94111) has been used to determine the peak impacts of these sources on local terrain above stack tip. Building downwash was incorporated into the ISCST3 estimates.

Predicted impacts of PM₁₀ and NOx were above their corresponding PSD significant impact increments. Additional modeling for compliance with both the NAAQS and PSD increments was required.

Increment

All areas surrounding the Clow facility are Class II PSD areas. It is the Ohio EPA policy that no individual project consumes more than 50% of the available PSD increment. Special consideration is given to projects that have modeled impacts greater than half but below 83% the remaining PSD increment on the fence line. The following is the summary of the impact of increment consuming

sources (peak annual and high-second-high short term impacts, except PM₁₀ 6th high 24-hour over five years):

Pollutant	Averaging Period	Project Concentration		Total PSD *** Concentration	PSD Increment Concentration
PM ₁₀	24-hour	24.4 ug/m3	*	24.4 ug/m3	15 ug/m3
	Annual	4.6 ug/m3	**	4.6 ug/m3	8.5 ug/m3
NOx	Annual	2.4 ug/m3		2.4 ug/m3	12.5 ug/m3

* Based on revised PM₁₀ emission rate allowable

** Based on original application PM₁₀ allowable

*** Combination of non-simultaneous peak impacts under CTSCREEN

Predicted PM₁₀ 24-hour PSD increment impacts exceed ½ of the available increment. Although impacts from the facility exceed Ohio EPA's policy which provides for future growth by limiting increment consumption, the areal extent of the receptors exceeding ½ the PM₁₀, 24-hour PSD increment is limited to the peaks of the hill adjacent to the proposed facility. Ohio EPA initially required the applicant to lower impacts by either reducing emission rates or modifying the source or facility layout.

In addition to limiting the overall predicted impact of the original air quality modeling analysis, Ohio EPA required an additional modeling analysis using the proposed air quality model AERMOD. The results of this analysis indicate lower constraining impacts which are below ½ the PM₁₀ PSD increment and provide additional assurance that future growth in the area will not be constrained.

NAAQS

Existing sources at the facility, existing sources above the PSD significant rates within the Clow significant impact area (SIA) and sources greater than 100 tons/year outside of the SIA are modeled to determine the combined impact of existing significant sources. A background value is added to account for minor sources not explicitly included in the modeling.

Pollutant	Averaging Period	Predicted Concentration	NAAQS Concentration	Concentration With Background
PM ₁₀	24-hour	92.46 ug/m3	150 ug/m3	148.46 ug/m3
	Annual	17.4 ug/m3	50 ug/m3	42.4 ug/m3
NOx	Annual	13.4 ug/m3	100 ug/m3	47.4 ug/m3

Secondary Impact Analysis

Clow has demonstrated that the predicted pollutant concentrations throughout the study area are below the secondary NAAQS thresholds. The secondary NAAQS are designed to limit the amount of pollutants in the ambient air to levels below those which could have an adverse impact on human welfare, soils and vegetation. The modeling analyses demonstrate that no significant impacts on human welfare, soils or vegetation will occur from the proposed modification.

Soil and Vegetation: EPA Air Quality Criteria documents were reviewed for information on pollutants and adverse effects on the type of vegetation and soils in the area. No adverse impact upon soils or vegetation is expected. The modeled concentrations are below the primary and secondary NAAQS limits.

Visibility: The Clow facility is located nearly 200 miles from the closest class I area. Primary or secondary pollutants associated with this project are not anticipated to affect local or class I visibility.

Toxics Analysis

The Ohio Air Toxics Policy requires evaluation of increases in air toxics above the one ton/year threshold. Emissions rates are modeled to determine whether they exceed the Maximum Acceptable Ground Level Concentration (MAGLC) which is defined under the Air Toxics Policy. There were no air toxic emitted exceeding the MAGLC that are not regulated by the MACT.

Conclusions

Based upon the review of the permit to install application and the supporting documentation provided by the applicant (and RMT, Inc., Clow's consultant), the Ohio EPA staff has determined the installation will comply with all applicable State and Federal environmental regulations and that the requirements for BACT are satisfied. Therefore, the Ohio EPA staff recommends that a permit to install be issued to the Clow facility for the modification of the 85 TPY cupola furnace



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

DRAFT

**Air Pollution Permit-to-Install
for
Clow Water Systems Company**

Facility ID: 0616010006
Permit Number: 06-07432
Permit Type: Chapter 31 mod
Issued: 7/18/2008
Effective: To be entered upon final issuance



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Permit-to-Install
 for
 Clow Water Systems Company

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 06-07432

Facility ID: 0616010006

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0616010006

Facility Description: Ductile Iron Pipe and Fittings.

Application Number(s): A0006231

Permit Number: 06-07432

Permit Description: PSD permit for emissions increases resulting from modifications of cupola (P901) in 1989 and 1998; includes synthetic minor restrictions for several supporting emissions units

Permit Type: Chapter 31 mod

Permit Fee: \$8,950.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 7/18/2008

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Clow Water Systems Company
P. O. Box 6001
2266 South Sixth Street
Coshocton (Tuscarawas Twp, OH 43812-6001

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: 06-07432

Permit Description: PSD permit for emissions increases resulting from modifications of cupola (P901) in 1989 and 1998; includes synthetic minor restrictions for several supporting emissions units

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

Emissions Unit ID:	F007
Company Equipment ID:	JOLT SHAKEOUT
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F014
Company Equipment ID:	LAEMPE CORE MACHINE
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F015
Company Equipment ID:	FOUNDRY SHOT BLAST
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F016
Company Equipment ID:	BMM SHAKEOUT
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	FITTINGS PAINTING
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K006
Company Equipment ID:	PIPE PAINT OPERATION - SMALL LINE
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P020
Company Equipment ID:	ANNEALING OVEN
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P901
Company Equipment ID:	CUPOLA
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 06-07432

Facility ID: 0616010006

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

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

3. General Requirements

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



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

4. Monitoring and Related Record Keeping and Reporting Requirements

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



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

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

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



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

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District



Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted



for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

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

16. Fees



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

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Southeast District Office must be notified in writing of any transfer of this permit.

18. Risk Management Plans

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

19. Title IV Provisions

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



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B. Facility-Wide Terms and Conditions



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1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.



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C. Emissions Unit Terms and Conditions



1. F007, JOLT SHAKEOUT

Operations, Property and/or Equipment Description:

F007 - Jolt shakeout vibrating table with baghouse; administrative modification to add federally-enforceable operating restrictions on throughput of fittings castings as requested by the permittee to ensure compliance with facility-wide emission rates protective of the National Ambient Air Quality Standards (NAAQS); supercedes PTI # 06-07603 issued in August 2008 (EU F007 only).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(2)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) from the baghouse stack serving emissions units (EUs) F004, F007 and P007 shall not exceed 0.0075 gr/dscf (5.78 lbs/hr).</p> <p>PE from EU F007 shall not exceed 0.38 lb/hr.</p> <p>Emissions of particulate matter less than 10 microns (PM₁₀) from EU F007 shall not exceed 0.26 lb/hr.</p> <p>Emissions of volatile organic compounds (VOC) from EU F007 shall not exceed 7.2 lbs/hr; 9.0 tons/ yr.</p> <p>Emissions of carbon monoxide (CO) from EUs F007 and F009, combined, shall not exceed 27.0 lbs/hr.</p> <p>Visible emissions of fugitive dust not captured by the side draft hood shall not exceed 5% opacity, as a six minute average.</p> <p>No visible particulate emissions shall be</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emitted from the baghouse stack. The permittee shall implement best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD requirements)	PE from EU F007 shall not exceed 0.48 ton as a rolling, 12-month summation. PM ₁₀ emissions from EU F007 shall not exceed 0.34 ton as a rolling, 12-month summation. Emissions of CO from EUs F007 and F009, combined, shall not exceed 33.75 tons as a rolling, 12-month summation.
c.	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).
d.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-07(B)	See b)(2)a. below.
f.	OAC rule 3745-17-08 (B)	See b)(2)a. below.

(2) Additional Terms and Conditions

- a. This facility is located in Coshocton County, which is not identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions from this emissions unit are exempt from the fugitive dust control requirements and visible emission limitation established in OAC rules 3745-17-08(B) and 3745-17-07(B), respectively.

c) Operational Restrictions

- (1) The Jolt Line which includes Jolt Pouring and Cooling (F009), Jolt Shakeout (F007), and the Jolt Sand Plant (P007) shall be limited to the following production rates based on a rolling, 12-month summation:
 - a. 175,000 tons sand; and
 - b. 15,000 tons metal production rates upon issuance of this permit.



- (2) The maximum throughput of this emissions unit (F007) shall not exceed 10,000 tons of fittings castings per year, based on a rolling, 12-month summation.
 - (3) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summations of the
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the side draft hood 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 d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total throughput of sand (in tons) of this emissions unit;
 - b. the total throughput of metal (in tons) of this emissions unit;
 - c. the rolling, 12-month summation of throughput, in tons of sand (i.e., the throughput for the current month added to the throughput for the previous 11 calendar months);
 - d. the rolling, 12-month summation of the PE, PM₁₀, and CO emissions rates, in tons.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summations of the production and emissions rates upon issuance of this permit.

- (3) The permittee shall collect and record the following information each month for this emissions unit:



- a. the total throughput of sand (in tons) of this emissions unit;
- b. the total throughput of metal (in tons) of this emissions unit;
- c. the rolling, 12-month summation of throughput, in tons of sand (i.e., the throughput for the current month added to the throughput for the previous 11 calendar months);
- d. the rolling, 12-month summation of throughput, in tons of metal (i.e., the throughput for the current month added to the throughput for the previous 11 calendar months); and
- e. the rolling, 12-month summation of the PE, PM₁₀, and CO emissions rates, in tons.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summations of the production and emissions rates upon issuance of this permit.

- (4) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total throughput of fittings castings (in tons) of this emissions unit;
 - b. the rolling, 12-month summation of throughput of fittings castings, in tons (i.e., the throughput for the current month added to the throughput for the previous 11 calendar months); and
 - c. the rolling, 12-month summation of the PE, PM₁₀, and CO emissions rates, in tons.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summations of the production and emissions rates upon issuance of this permit.

e) 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 side draft hood 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 Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (2) The permittee shall notify the Ohio EPA, Southeast District Office of any monthly record showing an exceedance of the rolling, 12-month throughput limitations specified in c)(1) and (2). A copy of such record shall be sent to the Ohio EPA, Southeast District Office within 30 days following the end of the calendar month in which the exceedance occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitations for PE, PM₁₀, and CO. The



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

- (4) 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 Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period. These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
Particulate emissions (PE) from the baghouse stack serving emissions units (EUs) F004, F007 and P007 shall not exceed 0.0075 gr/dscf (5.78 lbs/hr).

Applicable Compliance Method:

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

- b. Emission Limitation:
PE from EU F007 shall not exceed 0.38 lb/hr.
PE from EU F007 shall not exceed 0.48 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated using the following equations:

3.20 lbs PE per ton of metal (based on emissions factor from FIRE 6.23 SCC 3-04-003-31)
 maximum rate of 6 tons of metal per hour
 limited to 15,000 tons of metal based on a rolling, 12-month summation
 99% capture efficiency (based on application information)
 99% baghouse control efficiency

Stack Emissions

19.2 lbs/ton) X (6 tons/hr) = 19.2 lbs/hr uncontrolled
 (3.20lbs/hr) X (99% capture) X (99% control) = 0.19 lb/hr

(3.20 lbs/ton) X (15,000 tons/yr) = 48,000 lbs/yr uncontrolled
 (48,000 lbs/yr) X (99% capture) X (99% control) X (0.0005 ton/lb) = 0.24 ton/yr

Fugitive Emissions

(19.2 lbs/hr) X (1% capture loss) = 0.19 lb/hr



$$(48,000 \text{ lbs/yr}) \times (1\% \text{ capture loss}) \times (0.0005 \text{ ton/lb}) = 0.24 \text{ ton/yr}$$

Total Emissions

$$0.19 \text{ lb/hr} + 0.19 \text{ lb/hr} = 0.38 \text{ lb/hr}$$

$$0.24 \text{ ton/yr} + 0.24 \text{ ton/yr} = 0.48 \text{ ton/yr}$$

c. Emission Limitation:

Emissions of PM₁₀ from EU F007 shall not exceed 0.26 lb/hr.

PM₁₀ emissions from EU F007 shall not exceed 0.34 ton as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated using the following equations:

2.24 lbs PM₁₀ per ton of metal (based on emissions factor from FIRE 6.23 SCC 3-04-003-31)

tons of metal limited to 15,000 based on a rolling, 12-month summation maximum rate of 6 tons of metal per hour 99% capture efficiency (based on application information)

99% baghouse control efficiency

Stack Emissions

$$(2.24 \text{ lbs/ton}) \times (6 \text{ tons/hr}) = 13.44 \text{ lbs/hr uncontrolled}$$

$$(13.4 \text{ lbs/hr}) \times (99\% \text{ capture}) \times (99\% \text{ control}) = 0.13 \text{ lb/hr}$$

$$(2.24 \text{ lbs/ton}) \times (15,000 \text{ tons/yr}) = 33,600 \text{ lbs/yr uncontrolled}$$

$$(33,600 \text{ lbs/yr}) \times (99\% \text{ capture}) \times (99\% \text{ control}) \times (0.0005 \text{ ton/lb}) = 0.17 \text{ ton/yr}$$

Fugitive Emissions

$$(13.4 \text{ lbs/hr}) \times (1\% \text{ capture loss}) = 0.13 \text{ lb/hr}$$

$$(33,600 \text{ lbs/yr}) \times (1\% \text{ capture loss}) \times (0.0005 \text{ ton/lb}) = 0.17 \text{ ton/yr}$$

Total Emissions

$$0.13 \text{ lb/hr} + 0.13 \text{ lb/hr} = 0.26 \text{ lb/hr}$$

$$0.17 \text{ ton/yr} + 0.17 \text{ ton/yr} = 0.34 \text{ ton/yr}$$

d. Emission Limitation:

Emissions of VOC from EU F007 shall not exceed 7.2 lbs/hr; 9.0 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated using the following equations:

1.20 lbs VOC per ton of metal (based on emissions factor from FIRE 6.23 SCC 3-04-003-31)

maximum rate of 6 tons of metal per hour

limited to 15,000 tons of metal based on a rolling, 12-month summation uncontrolled

$$(1.20 \text{ lbs/ton}) \times (6 \text{ tons/hr}) = 7.2 \text{ lbs/hr}$$

$$(1.20 \text{ lbs/ton}) \times (15,000 \text{ tons/yr}) \times (0.0005 \text{ lb/ton}) = 9.0 \text{ tons/yr}$$



- e. Emission Limitation:
Emissions of CO from EUs F007 and F009, combined, shall not exceed 27.0 lbs/hr.
Emissions of CO from EUs F007 and F009, combined, shall not exceed 33.75 tons/yr as a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated using the following equations:

4.50 lbs CO per ton of metal (based on stack testing of a similar unit)
maximum rate of 6 tons of metal per hour

limited to 15,000 tons of metal per year based on a rolling 12-month summation
uncontrolled

$$(4.50 \text{ lbs/ton}) \times (6 \text{ tons/hr}) = 27.0 \text{ lbs/hr}$$

$$(4.50 \text{ lbs/ton}) \times (15,000 \text{ tons/yr}) \times (0.0005 \text{ ton/lb}) = 33.75 \text{ tons/yr}$$

- f. Emission Limitation:
Visible emissions of fugitive dust not captured by the side draft hood shall not exceed 5% opacity, as a six minute average.

Applicable Compliance Method:
If required, visible particulate emissions shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".

- g. Emission Limitation:
No visible particulate emissions shall be emitted from the baghouse stack.

Applicable Compliance Method:
If required, visible particulate emissions shall be determined according to test Method 22 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 2002.

g) Miscellaneous Requirements

- (1) Particulate emissions testing as required by PTI # 06-07603, issued on December 28, 2006, was completed on April 17, 2007.
- (2) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.



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Effective Date: To be entered upon final issuance



2. F014, LAEMPE CORE MACHINE

Operations, Property and/or Equipment Description:

F014 - Isocure machine (Laempe) with baghouse and wet scrubber; administrative modification to include a federally-enforceable emissions limitation on PM₁₀ that was requested by the permittee to ensure compliance with facility-wide emission rates protective of the National Ambient Air Quality Standards (NAAQS); supersedes PTI # 06-05183 issued on December 29, 1999 (EU F014 only)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD requirements and to ensure compliance with the NAAQS)	PM ₁₀ emissions from the baghouse stack shall not exceed 0.030 gr/dscf. VOC emissions shall not exceed 9.75 tons as a rolling, 12-month summation.
b.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) from the baghouse stack shall not exceed 0.030 gr/dscf (0.46 lb/hr) or there shall be no visible particulate emissions from this stack, whichever is less stringent. PE from the baghouse stack shall not exceed 2.03 tpy. VOC emissions shall not exceed 3.25 lbs/hr.
c.	OAC rule 3745-21-07 (G)	See b)(2)a. below.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation established by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirements specified in OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-07(A)	The emission limitation established by this applicable rule is less stringent than



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		the emission limitation established pursuant to the best available technology requirements specified in OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-17-07 (B)	See b)(2)b. below.
g.	OAC rule 3745-17-08 (B)	See b)(2)b. below.

(2) Additional Terms and Conditions

- a. This emissions unit is exempt from the requirements of OAC rule 3745-21-07(G) pursuant to OAC rule 3745-21-07(G)(9)(i) [the use of a phenolic urethane no-bake resin binder system in foundry core-making and mold-making operations]. This exemption was adopted by the Director of Ohio EPA and became effective June 15, 1999. The US EPA has agreed to consider this revised rule as federally enforceable during the time from the effective date of this permit to the effective date of US EPA approval of this rule as revision to the Ohio SIP for ozone.
- b. This facility is not located in an area identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions are exempt from the visible particulate emission limitation and the reasonably available control measures established in OAC rule 3745-17-07 (B) and OAC rule 3745-17-08 (B), respectively.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- (2) The permittee shall maintain monthly records of the following information:
 - a. the tons of sand used;
 - b. the total VOC emissions, in tons, calculated by multiplying the tons of sand used by 0.65 pound of VOC/ton of sand; and



- c. the rolling, 12-month summation of VOC emissions, in tons.
- e) Reporting Requirements:
 - (1) The permittee shall notify the Ohio EPA, Southeast District Office of any monthly record showing an exceedance of the rolling, 12 month emission limitation for VOC specified in section b)(1). A copy of such record shall be sent to the Ohio EPA, Southeast District Office within 30 days following the end of the calendar month in which the exceedance occurs.
 - (2) The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
 - (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 Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month periods.
- f) Testing Requirements
 - (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
PM₁₀ emissions from the baghouse stack shall not exceed 0.030 gr/dscf.

Applicable Compliance Method:
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - i. the emission testing shall be conducted within 3 months after issuance of the permit.
 - ii. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for P_{M10}.
 - iii. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
 - (a) PM₁₀ emissions shall be determined according to 40 CFR Part 51, Appendix M, Method 201, or 40 CFR Part 51, Appendix M, 201A as appropriate.



Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- v. not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- vi. personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- vii. a comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

- b. **Emission Limitation:**
VOC emissions shall not exceed 9.75 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the allowable volatile organic compound emission rate of 9.75 tons, based upon a rolling, 12-month summation, shall be determined by a monthly calculation of the pounds volatile organic compound per ton of sand emission factor multiplied by the tons of sand used, and divided by 2000 pounds per ton; added to the previous 11 months emissions in tons volatile organic compound, in accordance with the monitoring and recordkeeping requirements contained in this permit.

- c. **Emission Limitation:**
PE from the baghouse stack shall not exceed 0.030 gr/dscf (0.46 lb/hr) or there shall be no visible particulate emissions from this stack, whichever is less stringent.

Applicable Compliance Method:



If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" or, if required, compliance with the no visible particulate emissions requirement shall be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 22.

- d. Emission Limitation:
PE from the baghouse stack shall not exceed 2.03 tpy.

Applicable Compliance Method:
Compliance with the PE emission rate of 2.03 tons shall be determined by the one-time calculation of the maximum tons of sand processed in this emission unit per year, 30,000 tons, multiplied by the particulate emission factor of 0.65 lb of PE/ton of sand, assuming 99% capture efficiency and 99% baghouse control efficiency, divided by 2000 pounds per ton (based on application information).

- e. Emission Limitation:
VOC emissions shall not exceed 3.25 lbs/hr.

Applicable Compliance Method:
Compliance with the volatile organic compound emission rate of 3.25 lbs/hr shall be determined by the one-time calculation of the maximum tons of sand processed in this emission unit per hour, 5 tons/hour, as provided in the permittee's application, multiplied by the volatile organic compound emission factor of 0.65 lb of volatile organic compound/ton of sand.

g) Miscellaneous Requirements

- (1) None.



3. F015, FOUNDRY SHOT BLAST

Operations, Property and/or Equipment Description:

F015 - Foundry shotblast with baghouse; this unit was installed in 1972 so an installation permit was not required; however, the permittee has requested federally-enforceable operating restrictions on throughput of fittings castings and emissions limitations on PM₁₀ for this unit to ensure compliance with facility-wide emission rates protective of the National Ambient Air Quality Standards (NAAQS).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Synthetic minor to ensure compliance with the NAAQS)	PM ₁₀ emissions from the baghouse stack shall not exceed 0.020 gr/dscf. PM ₁₀ emissions shall not exceed 8.03 tons as a rolling, 12-month summation. See c)(1) below.
b.	OAC rule 3745-17-07(B)	See b)(2)a. below.
c.	OAC rule 3745-17-08(B)	See b)(2)a. below.

(2) Additional Terms and Conditions

a. This facility is not located in an area identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions are exempt from the visible particulate emission limitation and the reasonably available control measures established in OAC rule 3745-17-07 (B) and OAC rule 3745-17-08 (B), respectively.

c) Operational Restrictions

(1) The maximum throughput of this emissions unit shall not exceed 31,000 tons of fittings castings, based on a rolling 12-month summation. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to



generate the rolling, 12-month summation of the production rate upon issuance of this permit.

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

(1) The permittee shall collect and record the following information each month for this emissions unit:

- a. the total throughput of fittings castings (in tons) of this emissions unit;
- b. the rolling, 12-month summation of throughput of fittings castings, in tons (i.e., the throughput for the current month added to the throughput for the previous 11 calendar months); and
- c. the rolling, 12-month summation of the PM₁₀ emissions rate, in tons.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production and emissions rates upon issuance of this permit.

e) **Reporting Requirements**

(1) The permittee shall notify the Ohio EPA, Southeast District Office of any monthly record showing an exceedance of the rolling, 12-month throughput and emissions limitations specified in b)(1) and c)(1). A copy of such record shall be sent to the Ohio EPA, Southeast District Office within 30 days following the end of the calendar month in which the exceedance occurs.

f) **Testing Requirements**

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. **Emission Limitation:**
PM₁₀ emissions from the baghouse stack shall not exceed 0.020 gr/dscf.

Applicable Compliance Method:

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

- i. The emission testing shall be conducted within 3 months after issuance of the permit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PM₁₀.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
 - (a) PM₁₀ emissions shall be determined according to 40 CFR Part 51, Appendix M, Method 201, or 40 CFR Part 51, Appendix M, 201A as appropriate.



Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- vi. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- vii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

- b. Emission Limitation:
PM₁₀ emissions shall not exceed 8.03 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Compliance with the tons per rolling, 12-month period shall be based upon the following calculation:

$$\text{tons PM}_{10}/\text{rolling, 12-month period} = (0.020 \text{ gr/dscf}) \times (\text{flow rate of baghouse (dscf/min)}) \times (\text{lb}/7000 \text{ gr}) \times (60 \text{ min}/\text{hour}) \times (\text{ton}/2000 \text{ lbs}) \times (\text{actual hours of operation per rolling, 12-month period}).$$

- g) Miscellaneous Requirements

- (1) None.



4. F016, BMM SHAKEOUT

Operations, Property and/or Equipment Description:

F016 - BMM shakeout with baghouse; this unit was installed in 1972 so an installation permit was not required; however, the permittee has requested federally-enforceable operating restrictions on throughput of fittings castings and emissions limitations on PM₁₀ for this unit to ensure compliance with facility-wide emission rates protective of the National Ambient Air Quality Standards (NAAQS)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Synthetic minor to ensure compliance with the NAAQS)	PM ₁₀ emissions from the baghouse stack shall not exceed 0.0075 gr/dscf. PM ₁₀ emissions shall not exceed 25.34 tons as a rolling, 12-month summation. See c)(1) below.
b.	OAC rule 3745-17-07(B)	See b)(2)a. below.
c.	OAC rule 3745-17-08(B)	See b)(2)a. below.

(2) Additional Terms and Conditions

a. This facility is not located in an area identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions are exempt from the visible particulate emission limitation and the reasonably available control measures established in OAC rule 3745-17-07 (B) and OAC rule 3745-17-08 (B), respectively.

c) Operational Restrictions

(1) The maximum throughput of this emissions unit shall not exceed 20,000 tons of fittings castings, based on a rolling, 12-month summation. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate upon issuance of this permit.



d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions unit:

- a. the total throughput of fittings castings (in tons) of this emissions unit;
- b. the rolling, 12-month summation of throughput of fittings castings, in tons (i.e., the throughput for the current month added to the throughput for the previous 11 calendar months); and
- c. the rolling, 12-month summation of the PM₁₀ emissions rate, in tons.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production and emissions rates upon issuance of this permit.

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA, Southeast District Office of any monthly record showing an exceedance of the rolling, 12-month throughput and emissions limitations specified in b)(1) and c)(1). A copy of such record shall be sent to the Ohio EPA, Southeast District Office within 30 days following the end of the calendar month in which the exceedance occurs.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
PM₁₀ emissions from the baghouse stack shall not exceed 0.0075 gr/dscf.

Applicable Compliance Method:

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

- i. the emission testing shall be conducted within 3 months after issuance of the permit.
- ii. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PM₁₀.
- iii. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

- (a) PM₁₀ emissions shall be determined according to 40 CFR Part 51, Appendix M, Method 201, or 40 CFR Part 51, Appendix M, 201A as appropriate.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



- iv. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- vi. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- vii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

b. Emission Limitation:
 PM₁₀ emissions shall not exceed 25.34 tons as a rolling, 12-month summation.

Applicable Compliance Method:
 Compliance with the tons per rolling, 12-month period shall be based upon the following calculation:

$$\text{tons PM}_{10}/\text{rolling, 12-month period} = (0.0075 \text{ gr/dscf}) \times (\text{flow rate of baghouse (dscf/min)}) \times (\text{lb}/7000 \text{ gr}) \times (60 \text{ min}/\text{hour}) \times (\text{ton}/2000 \text{ lbs}) \times (\text{actual hours of operation per rolling, 12-month period}).$$

g) Miscellaneous Requirements

(1) None.



5. K002, FITTINGS PAINTING

Operations, Property and/or Equipment Description:

K002 - Fittings painting operation; this unit was installed in 1965 so an installation permit was not required; however, the permittee has requested federally-enforceable emissions limitations on PM₁₀ for this unit to ensure compliance with facility-wide emission rates protective of the National Ambient Air Quality Standards (NAAQS).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Synthetic minor to ensure compliance with the NAAQS)	PM ₁₀ emissions from the stack shall not exceed 0.75 ton based on a rolling, 12-month summation.
b.	OAC rule 3745-21-09(U)(1)(d)	Volatile compound emissions per gallon of coating shall not exceed 3.5 pounds, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-17-11(B)(1)	PE from the stack shall not exceed 0.551 lb/hr (from Table I).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

(2) The maximum coating usage for this emissions unit shall not exceed 7,532 gallons, based upon a rolling, 12-month summation of the coating usage figures. This emissions



unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- (2) The permittee shall collect and record the following information each month for the coating line:
 - a. The name and identification number of each coating employed;
 - b. the solids content, in pounds per gallon, of each coating employed;
 - c. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon as applied;
 - d. the total volume, in gallons, of each coating employed;
 - e. the rolling, 12-month summation of the coating usage;
 - f. the total solids usage [the sum of (b. times d.) for all coatings], in tons; and
 - g. the updated, rolling 12-month summation for PM₁₀ emissions, calculated according to the equation in f)(1)a.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions rate upon issuance of this permit.

e) Reporting Requirements

- (1) The permittee shall notify the Ohio EPA Southeast District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
- (2) The permittee shall notify the Ohio EPA Southeast District Office in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days following the end of the calendar month in which the exceedance occurs.
- (3) The permittee shall notify the Ohio EPA Southeast District Office in writing of any monthly record showing an exceedance of the rolling, 12 month emission limitation for PM₁₀ specified in b)(1). A copy of such record shall be sent to the Ohio EPA, Southeast District Office within 30 days following the end of the calendar month in which the exceedance occurs.
- (4) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating usage limitation. The quarterly deviation



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

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

PM₁₀ emissions from the stack shall not exceed 0.75 ton based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limit shall be determined in accordance with the following method:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = PM₁₀ emission rate (tons per month),

M = total coating solids usage rate (tons per month),

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.50 per application),

CE = control efficiency of the control equipment (0.90 for panel filters).

Compliance with the rolling, 12-month emission limit shall be determined by adding the current month to the previous 11 calendar months totals.

b. Emission Limitation:

Volatile compound emissions per gallon of coating shall not exceed 3.5 pounds, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the volatile compound contents of the coatings.

c. Emission Limitation:

Visible particulate emissions from the 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 determined by Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

d. Emission Limitation:

Particulate emissions from the stack shall not exceed 0.551 lb/hr(from Table I).



Applicable Compliance Method:

Compliance with the particulate emission limit shall be determined in accordance with the following method:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (in pounds per hour),

M = total coating solids usage rate (in pounds per hour),

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.50 per application),

CE = control efficiency of the control equipment (0.90 for panel filters).

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".

g) Miscellaneous Requirements

- (1) None.



6. K006, PIPE PAINT OPERATION - SMALL LINE

Operations, Property and/or Equipment Description:

K006 - Pipe painting operation; this unit was installed in 1983 without an installation permit so this permit imposes BAT limits as well as the federally-enforceable emissions limitations on PM₁₀ requested by the permittee to ensure compliance with facility-wide emission rates protective of the National Ambient Air Quality Standards (NAAQS).

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Synthetic minor to ensure compliance with the NAAQS)	PM ₁₀ emissions from the stack shall not exceed 1.21 tons based on a rolling 12-month summation.
b.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) from the stack shall not exceed 0.79 pound per hour. No visible particulate emissions shall be emitted from the stack serving this emissions unit. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-21-09(U)(1)(d).
c.	OAC rule 3745-21-09(U)(1)(d)	Volatile compound emissions per gallon of coating shall not exceed 3.5 pounds, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.
d.	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).
e.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

(2) The maximum coating usage for this emissions unit shall not exceed 243,066 gallons, based upon a rolling, 12-month summation of the coating usage figures. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

(2) The permittee shall collect and record the following information each month for the coating line:

- a. The name and identification number of each coating employed;
- b. the solids content, in pounds per gallon, of each coating employed;
- c. the VOC content of each coating (excluding water and exempt solvents), as applied;
- d. the total volume, in gallons, of each coating employed;
- e. the rolling, 12-month summation of the coating usage;
- f. the total solids usage [the sum of (b. times d.) for all coatings], in tons; and
- g. the updated, rolling 12-month summation for PM₁₀ emissions, calculated according to the equation in f)(1)a.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions rate upon issuance of this permit.

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA Southeast District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit



was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.

- (2) The permittee shall notify the Ohio EPA Southeast District Office in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days following the end of the calendar month in which the exceedance occurs.
- (3) The permittee shall notify the Ohio EPA Southeast District Office in writing of any monthly record showing an exceedance of the rolling, 12 month emission limitation for PM₁₀ specified in b)(1)a. A copy of such record shall be sent to the Ohio EPA, Southeast District Office within 30 days following the end of the calendar month in which the exceedance occurs.
- (4) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating usage limitation. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

PM₁₀ emissions from the stack shall not exceed 1.21 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month emissions limit shall be determined in accordance with the following method:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = PM₁₀ emission rate (tons per month),

M = total coating solids usage rate (tons per month),

TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.50 per application),

CE = control efficiency of the control equipment (0.90 for panel filters).

Compliance with the rolling, 12-month emission limit shall be determined by adding the current month to the previous 11 calendar months totals.

b. Emission Limitation:

PE from the stack shall not exceed 0.79 pound per hour.

Applicable Compliance Method:



Compliance with the hourly PE rate of 0.72 pound per hour shall be determined in accordance with the following method:

$$E = (M) * (1-TE) * (1-CE)$$

Where:

E = PE/PM₁₀ emission rate (in pounds per hour),
M = total coating solids usage rate (in pounds per hour),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.50 per application),
CE = control efficiency of the control equipment (0.90 for panel filters).

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".

Compliance with the tons per year emissions limitation for PE shall be determined in accordance with the following method:

$$E = (M) * (1-TE) * (1-CE)$$

Where:

E = PE rate (tons per month),
M = total coating solids usage rate (tons per month),
TE = transfer efficiency of coating equipment (ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, 0.50 per application),
CE = control efficiency of the control equipment (0.90 for panel filters).

- c. Emission Limitation:
No visible particulate emissions shall be emitted from the stack serving this emissions unit.

Applicable Compliance Method:
If required, visible particulate emissions shall be determined according to test Method 22 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".

- d. Emission Limitation:
Volatile compound emissions per gallon of coating shall not exceed 3.5 pounds, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the volatile compound contents of the coatings.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 06-07432

Facility ID: 0616010006

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



7. P020, ANNEALING OVEN

Operations, Property and/or Equipment Description:

P020 - Annealing oven fired with natural gas; this unit was installed in 1977 without an installation permit so this permit imposes BAT limits as well as the federally-enforceable operating restrictions on natural gas usage requested by the permittee to avoid PSD requirements for CO.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD requirements)	Carbon monoxide (CO) emissions shall not exceed 23.93 tons based on a rolling, 12-month summation.
b.	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 0.72 pound per hour; 2.17 tons per year.</p> <p>Sulfur dioxide (SO₂) emissions shall not exceed 0.057 pound per hour; 0.17 ton per year.</p> <p>CO emissions shall not exceed 7.98 pounds per hour.</p> <p>Volatile organic compounds (VOC) emissions shall not exceed 0.52 pound per hour; 1.57 tons per year.</p> <p>Nitrogen oxides (NO_x) emissions shall not exceed 9.50 pounds per hour; 28.49 tons per year.</p> <p>No visible particulate emissions shall be emitted from the stack serving this emissions unit.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C).
c.	OAC rule 3745-17-11	See b)(2)a. below.
d.	OAC rule 3745-17-07	See b)(2)b. below.
e.	OAC rule 3745-18-06(E)	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 uncontrolled mass rate of emissions (UMRE) for particulate matter from this emissions unit is less than 10 pounds per hour because the metal pipe charged does not emit particulates. The only source of particulate emissions from this natural gas-fired annealing furnace is from the combustion of natural gas. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii) and OAC rule 3745-17-11(A)(4), Figure II and Table I, respectively, do not apply to this emissions unit.
- b. Since the mass rate of emissions for particulates in OAC rule 3745-17-11 is not applicable, the opacity limits in OAC rule 3745-17-07 are also not applicable.

c) Operational Restrictions

- (1) The maximum natural gas usage shall not exceed 569,760,000 cubic feet (cf) based on a rolling 12-month summation. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the natural gas usage upon issuance of this permit.
- (2) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total natural gas usage, in cf;
 - b. the updated 12-month summation of natural gas usage, in cf, calculated by adding the usage information for the current month and the preceding 11 calendar months; and
 - c. the rolling, 12-month summation of the CO emissions rate, in tons.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the natural gas usage and CO emissions rate upon issuance of this permit.



- (2) 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.

e) Reporting Requirements

- (1) The permittee shall notify the Ohio EPA Southeast District Office in writing of any monthly record showing an exceedance of the rolling 12-month natural gas usage or CO emissions limitations. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days following the end of the calendar month in which the exceedance occurs.
- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
PE shall not exceed 0.72 pound per hour; 2.17 tons per year.

Applicable Compliance Method:

Compliance with the hourly PE rate of 0.72 pound per hour shall be determined by the one-time calculation of the maximum hourly heat input rate of this unit, 94.96 million Btu/hr, as provided in the permittee's application, multiplied by the PE factor of 7.6 lbs of PE per million scf of natural gas in AP-42 Section 1.4 Table 1.4-2 (7/1998), multiplied by 1 scf of natural gas/1000 Btu.

Compliance with the tons per year emission limitation for PE shall be demonstrated by multiplying the PE factor of 7.6 lbs of PE per million scf of natural gas in AP-42 Section 1.4 Table 1.4-2 (7/1998), by the actual annual fuel usage in scf, by 1 million scf/1,000,000 cf, then dividing by 2000 lbs/ton.

If required, PE shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

- b. Emission Limitation:
SO₂ emissions shall not exceed 0.057 pound per hour; 0.17 ton per year.

Applicable Compliance Method:

Compliance with the hourly SO₂ emission rate of 0.057 pound per hour shall be determined by the one-time calculation of the maximum hourly heat input rate of this unit, 94.96 MMBtu/hr, as provided in the permittee's application, multiplied by the SO₂ emission factor of 0.6 lb of SO₂ per mmscf of natural gas in AP-42 Section 1.4 Table 1.4-2 (7/1998), multiplied by 1 scf of natural gas/1000 Btu.



Compliance with the tons per year emission limitation for SO₂ shall be demonstrated by multiplying the SO₂ emission factor of 0.6 lb of SO₂ per mmscf of natural gas in AP-42 Section 1.4 Table 1.4-2 (7/1998), by the actual annual fuel usage in scf, by 1 mmscf/1,000,000 cf, then dividing by 2000 lbs/ton.

If required, SO₂ emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

c. Emission Limitation:

CO emissions shall not exceed 7.98 pounds per hour.

CO emissions shall not exceed 23.93 tons based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the hourly CO emission rate of 7.98 pounds per hour shall be determined by the one-time calculation of the maximum hourly heat input rate of this unit, 94.96 MMBtu/hr, as provided in the permittee's application, multiplied by the CO emission factor of 84 lbs of CO per mmscf of natural gas in AP-42 Section 1.4 Table 1.4-1 (7/1998), multiplied by 1 scf of natural gas/1000 Btu.

Compliance with the rolling, 12-month emission limitation for CO shall be demonstrated by multiplying the CO emission factor of 84 lbs of CO per mmscf of natural gas in AP-42 Section 1.4 Table 1.4-1 (7/1998), by the actual fuel usage per rolling, 12-month period in scf, by 1 mmscf/1,000,000 cf, then dividing by 2000 lbs/ton.

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

d. Emission Limitation:

VOC emissions shall not exceed 0.52 pound per hour; 1.57 tons per year.

Applicable Compliance Method:

Compliance with the hourly VOC emission rate of 0.52 pound per hour shall be determined by the one-time calculation of the maximum hourly heat input rate of this unit, 94.96 MMBtu/hr, as provided in the permittee's application, multiplied by the VOC emission factor of 5.5 lbs of VOC per mmscf of natural gas in AP-42 Section 1.4 Table 1.4-2 (7/1998), multiplied by 1 scf of natural gas/1000 Btu.

Compliance with the tons per year emission limitation for VOC shall be demonstrated by multiplying the VOC emission factor of 5.5 lbs of VOC per mmscf of natural gas in AP-42 Section 1.4 Table 1.4-2 (7/1998), by the actual annual fuel usage in scf, by 1 mmscf/1,000,000 cf, then dividing by 2000 lbs/ton.



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

e. Emission Limitation:

NO_x emissions shall not exceed 9.50 pounds per hour; 28.49 tons per year.

Applicable Compliance Method:

Compliance with the hourly NO_x emission rate of 9.50 pounds per hour shall be determined by the one-time calculation of the maximum hourly heat input rate of this unit, 94.96 MMBtu/hr, as provided in the permittee's application, multiplied by the NO_x emission factor of 100 lbs of NO_x per mmscf of natural gas in AP-42 Section 1.4 Table 1.4-1 (7/1998), multiplied by 1 scf of natural gas/1000 Btu.

Compliance with the tons per year emission limitation for NO_x shall be demonstrated by multiplying the NO_x emission factor of 100 lbs of NO_x per mmscf of natural gas in AP-42 Section 1.4 Table 1.4-1 (7/1998), by the actual annual fuel usage in scf, by 1 mmscf/1,000,000 cf, then dividing by 2000 lbs/ton.

If required, NO_x emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

f. Emission Limitation:

No visible particulate emissions shall be emitted from the stack serving this emissions unit.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to test Method 22 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".

g) Miscellaneous Requirements

- (1) None.



8. P901, CUPOLA

Operations, Property and/or Equipment Description:

P901 - 85 TPH cupola furnace for molten iron production controlled by an afterburner and wet scrubber system; this unit was installed in 1949 so an installation permit was not required; however, Chapter 31 major modifications of this emissions unit occurred in 1989 and 1998 that increased the production rate and resulted in emissions increases above PSD significance levels so this permit imposes the PSD and BAT requirements applicable at the time of the modification; the permittee has also requested federally-enforceable operating restrictions on throughput of molten iron and hours of operation to ensure compliance with facility-wide emission rates protective of the National Ambient Air Quality Standards (NAAQS)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Emissions of particulate matter (PM) from the stack shall not exceed 0.083 pound per ton of molten iron produced; 7.04 pounds per hour.</p> <p>Emissions of particulate matter less than 10 microns (PM₁₀) from the stack shall not exceed 5.47 pounds per hour.</p> <p>Sulfur dioxide (SO₂) emissions from the stack shall not exceed 0.015 pound per ton of molten iron produced; 1.27 pounds per hour.</p> <p>Carbon monoxide (CO) emissions from the stack shall not exceed 0.51 pounds per ton of molten iron produced; 43.35 pounds per hour.</p> <p>Volatile organic compounds (VOC) emissions from the stack shall not exceed 22.95 pounds per hour.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Nitrogen oxides (NO_x) emissions from the stack shall not exceed 39.1 pounds per hour.</p> <p>Visible particulate emissions (PE) of fugitive dust shall not exceed 20% opacity, as a 3-minute average.</p> <p>Best available control measures shall be implemented that are sufficient to minimize or eliminate emissions of fugitive dust.</p> <p>See b)(2)a.-c. below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC 3745-31- 05(D), OAC rule 3745-31-10 through 20, and OAC rule 3745-21-08(D).</p>
b.	OAC rule 3745-31-10 through -20	<p>PM₁₀ emissions from the stack shall not exceed 0.064 pound per ton of molten iron produced.</p> <p>PM₁₀ emissions from the stack shall not exceed 8.80 tons based on a rolling, 12-month summation.</p> <p>VOC emissions from the stack shall not exceed 0.27 pound per ton of molten iron produced.</p> <p>VOC emissions from the stack shall not exceed 37.13 tons based on a rolling, 12-month summation.</p> <p>NO_x emissions from the stack shall not exceed 0.46 pound per ton of molten iron produced.</p> <p>NO_x emissions from the stack shall not exceed 63.25 tons based on a rolling, 12-month summation.</p> <p>See b)(2)d.-f. below.</p>
c.	OAC rule 3745-31-05(D)	PM from the stack shall not exceed 11.41



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(Synthetic minor to avoid PSD requirements and to ensure compliance with the NAAQS)	tons based on a rolling, 12-month summation. SO ₂ emissions from the stack shall not exceed 2.06 tons based on a rolling, 12-month summation. CO emissions from the stack shall not exceed 70.13 tons based on a rolling, 12-month summation.
d.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-21-08(D)	See b)(2)e. below.
f.	OAC rule 3745-17-08	See b)(2)g. below.
g.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
h.	OAC 3745-18-06(E)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
i.	Director's Final Findings and Orders issued December 30, 2004, Section V.2.	See b)(2)h.-j. below.

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control measures on the cupola furnace for the purpose of minimizing or eliminating emissions of fugitive dust. In accordance with the permittee's application, the permittee shall maintain enclosures and vent emissions to a scrubber system to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing additional measures to ensure compliance.
- b. The charge door to cupola shall remain closed during those times when the cupola is not being charged to minimize or eliminate visible emissions.
- c. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
- d. As part of the BACT determination for PM₁₀, the cupola emissions must be vented to an operating scrubber system with a control efficiency of at least



99.4%. Compliance with the control efficiency requirement shall be demonstrated by compliance with the short term PM₁₀ emission limits in Section b)(1)a.

- e. As part of the BACT determination for VOC, the cupola emissions must be vented to an afterburner. VOC and CO gases generated during the operation of this emission unit shall be burned at 1300 degrees Fahrenheit for 0.3 seconds or greater in a direct-flame afterburner or equivalent device equipped with an indicating pyrometer which is positioned in the working area at the operator's eye level.
- f. As part of the BACT determination for NO_x, the cupola emissions must be vented to an afterburner equipped with low NO_x burners.
- g. This facility is not located in an area identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions are exempt from the visible particulate emission limitation and the reasonably available control measures established in OAC rule 3745-17-07 (B) and OAC rule 3745-17-08 (B), respectively.
- h. The permittee shall maintain and implement the preventive maintenance and malfunction abatement plan (PMMAP) required by Order #2 of the Director's Final Findings and Orders issued December 30, 2004 that was received by Ohio EPA on March 10, 2005, as well as any modifications of the PMMAP that have been approved by Ohio EPA. The PMMAP for the afterburner and wet scrubber systems is designed to prevent, detect, and correct malfunctions or equipment failures which could result in emissions exceeding any applicable law. The PMMAP shall be in writing and include the following:
 - i. a comprehensive preventive maintenance program, including a description of the items or conditions that will be inspected, the frequency of these inspections or repairs, and an identification of the types and quantities of the replacement parts which will be maintained in inventory for quick replacement;
 - ii. an identification of the source and operating outlet variables of the air pollution control equipment that will be monitored in order to detect a malfunction or failure, the normal operating range of these variables, and a description of the monitoring or surveillance procedures and of the method of informing operating personnel of any malfunction, including alarm systems, lights and/or other indicators; and,
 - iii. a description of the corrective procedures that will be taken in the event of a malfunction or failure in order to achieve compliance with any applicable law as expeditiously as practical.
- i. The permittee shall maintain operation and maintenance records to demonstrate that the PMMAP is fully implemented.
- j. The Ohio EPA retains the right to require the permittee to modify the PMMAP, should operating experience show that modification is necessary. Any



modifications to the PMMAP must be approved by Ohio EPA, in writing, prior to the permittee's implementation of the modifications in accordance with b)(2)h.

c) Operational Restrictions

- (1) The maximum production rate for this emissions unit shall not exceed 275,000 tons of molten iron produced based on a rolling, 12-month summation; and
- (2) This emissions unit shall operate for no more than 20 hours per day.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the static pressure drop, in inches of water, across the scrubber during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the static pressure drop, in inches of water, across the scrubber a minimum of once every two hours.

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

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

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

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future emissions tests that demonstrate compliance with the allowable emissions rates for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.



- (2) The permittee shall install, operate and maintain a continuous temperature monitor and recorder which measures and records the exhaust gas temperature when the emission unit is in operation. Units shall be in degrees Fahrenheit. The temperature monitor and recorder 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 day:
 - a. the hours per day this emissions unit is operated; and
 - b. all control equipment downtime, including start and end times of each incident, for the capture (collection) system, control devices, monitoring equipment, and the associated emissions unit.
- (4) 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 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 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) The permittee shall perform daily checks, during each of the following operational conditions: 1) when the emission unit is in normal operation, 2) when the by-pass cap is open during shut down, and 3) during any malfunction, when the weather conditions allow, for any visible particulate emissions from the stack or bypass cap 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.

The presence of water vapor in the scrubber plume does not constitute visible emissions.

- (6) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total weight of metal produced (in tons) in this emissions unit;
 - b. the rolling, 12-month summation of metal produced, in tons (i.e., the metal produced rate for the current month added to the metal produced rate for the previous 11 calendar months); and
 - c. the rolling, 12-month summation of the PM, PM₁₀, NO_x, SO₂, VOC, and CO emissions rates, in tons.

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the static pressure drop across the scrubber was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

- (2) The permittee shall submit deviation (excursion) reports which provide the following information for each period during which the exhaust gas temperatures fall below the applicable limitations:
 - a. the date of the excursion;
 - b. the time interval over which the excursion occurred;
 - c. the temperature values during the excursion;
 - d. the cause(s) for the excursion; and
 - e. the corrective action which has been or will be taken to prevent similar excursions in the future.



- (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed from this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (4) The permittee shall submit semiannual written reports that identify (a) all days during which any visible particulate emissions were observed from the stack serving this emissions unit during each of the following operational conditions: 1) when the emission unit is in normal operation, 2) when the by-pass cap is open during shut down, and 3) during any malfunction, when the weather conditions allow and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (5) The permittee shall notify the Ohio EPA, Southeast District Office of any monthly record showing an exceedance of the rolling, 12-month production limitations specified in c)(1) or any day during which the 20-hour limit on operations in c)(2) is exceeded. A copy of such record shall be sent to the Ohio EPA, Southeast District Office within 30 days following the end of the calendar month in which the exceedance occurs.
- (6) The permittee shall notify the Ohio EPA, Southeast District Office of any monthly record showing an exceedance of the rolling, 12-month emissions limitations specified in b)(1). A copy of such record shall be sent to the Ohio EPA, Southeast District Office within 30 days following the end of the calendar month in which the exceedance occurs.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

PM emissions from the stack shall not exceed 0.083 pound per ton of molten iron produced; 7.04 pounds per hour.

Applicable Compliance Method:

The pounds per ton of molten iron produced emission limitation was established using the emission factor of 13.8 pounds of particulate emissions per ton of gray iron produced (1/95 AP-42 Table 12.10-3) multiplied by the 99.4% control efficiency which equals 0.083 pounds per ton of molten iron produced.

The pounds per hour emission limitation was established using the emission factor of 13.8 pounds of particulate emissions per ton of gray iron produced (1/95 AP-42 Table 12.10-3) multiplied by 85 tons of gray iron produced per hour (maximum operating rate) multiplied by the 99.4% control efficiency which equals 7.04 pounds per hour.

Compliance shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". See f)(2).



- b. Emission Limitations:
SO₂ emissions from the stack shall not exceed 0.015 pound per ton of molten iron produced; 1.27 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". See f)(2).

- c. Emission Limitations:
CO emissions from the stack shall not exceed 0.51 pounds per ton of molten iron produced; 43.35 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". See f)(2).

- d. Emission Limitation:
Visible particulate emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 2002.

- e. Emission Limitations:
PM₁₀ emissions from the stack shall not exceed 5.47 pounds per hour.
PM₁₀ emissions from the stack shall not exceed 0.064 pound per ton of molten iron produced.

Applicable Compliance Method:

The pounds per hour emission limitation was established using the emission factor of 13.8 pounds of particulate emissions per ton of gray iron produced (1/95 AP-42 Table 12.10-3) multiplied by 77.7% (percent of particulate emission that are less than 10 microns per 1/95 AP-42 Table 12.10-9) multiplied by 85 tons of gray iron produced per hour (maximum operating rate) multiplied by the 99.4% control efficiency which equals 5.47 pounds per hour.

The pounds per ton of molten iron produced emission limitation was established using the emission factor of 13.8 pounds of particulate emissions per ton of gray iron produced (1/95 AP-42 Table 12.10-3) multiplied by 77.7% (percent of particulate emission that are less than 10 microns per 1/95 AP-42 Table 12.10-9) by the 99.4% control efficiency which equals 0.064 pounds per ton of molten iron produced.

Compliance shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", or 40 CFR Part 51, Appendix M, Method 201, or 40 CFR Part 51, Appendix M, 201A as appropriate. See f)(2).



- f. Emission Limitations:
VOC emissions from the stack shall not exceed 22.95 pounds per hour.
VOC emissions from the stack shall not exceed 0.27 pound per ton of molten iron produced.

Applicable Compliance Method:

Compliance shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C) or an approved test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentrations, and on a consideration of the potential presence of interfering gases. See f)(2).

- g. Emission Limitations:
NO_x emissions from the stack shall not exceed 39.1 pounds per hour.
NO_x emissions from the stack shall not exceed 0.46 pound per ton of molten iron produced.

Applicable Compliance Method:

Compliance shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". See f)(2).

- h. Emissions Limitations:
PM₁₀ emissions from the stack shall not exceed 8.80 tons based on a rolling, 12-month summation.

VOC emissions from the stack shall not exceed 37.13 tons based on a rolling, 12-month summation.

NO_x emissions from the stack shall not exceed 63.25 tons based on a rolling, 12-month summation.

PM from the stack shall not exceed 11.41 tons based on a rolling, 12-month summation.

SO₂ emissions from the stack shall not exceed 2.06 tons based on a rolling, 12-month summation.

CO emissions shall not exceed 70.13 tons based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following:

$$E = M \times EF / 2000 \text{ lbs/ton}$$

where:

E = the emission rate, in tons, based on a rolling, 12-month summation;

M = the molten iron production rate, in tons, during the rolling, 12-month period;
and



EF= the most recent emission factor for each pollutant, in pounds of pollutant per ton of molten iron, determined from the most recent emissions test.

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

Applicable Compliance Method:
Compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 2002.

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

- a. The emission testing shall be conducted within 3 months after issuance of the permit.
- b. The emission testing shall be conducted to demonstrate compliance with the mass emission limitations for PM, PM₁₀, NO_x, SO₂, CO and VOC.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

For PM, Methods 1-5 of 40 CFR Part 60, Appendix A

For PM₁₀, Methods 1-4 and 201 or 201A of 40 CFR Part 51, Appendix M

For fugitive and stack visible emissions, Method 9 of 40 CFR Part 60, Appendix A

For NO_x, Methods 1-4 and 7 or 7E of 40 CFR Part 60, Appendix A

For SO₂, Methods 1-4 and 6 or 6C of 40 CFR Part 60, Appendix A

For CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A

For VOC, Methods 1-4 and 25 and/or 18 of 40 CFR Part 60, Appendix A

The VOC pounds per hour emission rate observed during the emissions test shall be calculated in accordance with OAC rule 3745-21-10(C)(7) where the average molecular weight of the VOC emissions equals 16. i.e., the VOC as carbon emission rate observed during testing shall be converted to the appropriate units by multiplying the VOC as carbon emission rate observed during testing by 16 and dividing by 12.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.



- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office refusal to accept the results of the emission test(s).
 - f. Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment
 - g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.
- g) Miscellaneous Requirements
- (1) None.