



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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P.O. Box 1049  
Columbus, OH 43216-1049

12/3/2008

Certified Mail

Mr. Todd Rouse  
GMC Powertrain Div.  
26427 State Route 281 East  
Defiance, OH 43512-0070

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0320010001  
Permit Number: P0103623  
Permit Type: Administrative Modification  
County: Defiance

Yes	TOXIC REVIEW
Yes	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
Yes	NETTING
No	MAJOR NON-ATTAINMENT
No	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, Crescent-News. 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, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402

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, Northwest District Office at (419)352-8461.

Sincerely,

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

Cc: U.S. EPA  
Ohio EPA-NWDO; Michigan; Indiana

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



PUBLIC NOTICE  
Issuance Of Draft Air Pollution Permit-To-Install  
GMC Powertrain Div.

Issue Date: 12/3/2008

Permit Number: P0103623

Permit Type: Administrative Modification

Permit Description: Administrative modification to revise emission limits based on the results of emission testing. This permit action supersedes PTI 03-13364 issued 07/10/00 and administratively modified 01/06/04 for emissions units P411, P412, P419 and P420 only.

Facility ID: 0320010001

Facility Location: GMC Powertrain Div.  
State Route 281 East,  
Defiance, OH 43512

Facility Description: Iron Foundries

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road or (419)352-8461. The permit can be downloaded from the Web page: [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc)



Permit Number: P0103623

Facility ID: 0320010001

Administrative Modification of PTI 03-13364 for emissions units P411, P412, P419 & P420

**NETTING DETERMINATION**

Listed below are the sources that GMC Powertrain has removed or will remove (based on actual) or will control, as well as the new sources. For all units that are installing controls, or being shut down, to gain a net decrease, the permittee shall install the controls proposed on those units, or accomplish the permanent shut down of the units involved, prior to startup of the units under this permit.

**PM EMISSIONS INCREASE (TPY)**

CONST DATE	STARTUP DATE	PTI#	SOURCE	INCREASE
05/03/95	08/01/95	03-08591	P383 Hot Box Core Mach. #96- Plt. 1	4.14
05/03/95	08/01/95	03-08591	P384 Hot Box Core Mach. #97- Plt. 1	4.14
05/03/95	08/01/95	03-08591	P385 Hot Box Core Mach. #98- Plt. 1	5.80
05/03/95	08/01/95	03-08591	P386 Hot Box Core Mach. #99- Plt. 1	5.80
05/17/95	10/30/95	03-08574	P380 No. 12 Cleaning Cabinet	20.72
05/17/95	10/30/95	03-08574	P381 Head Grinder- Gen.III-Plt.1	3.20
05/17/95	10/30/95	03-08574	P382 Gen. III Head Facilities- Misc equip. Plt. 1	19.45
04/24/96	09/01/96	03-09568	P393 2.35 TPH Shot Reclaim Syst.	1.10
05/03/95	10/22/96	03-08624	P387 Cold Box Core Mach. #93, 94, 95	0.63
03/27/96	04/01/97	03-09233	P388 H. B. Core Mach. #100-101	3.61
03/27/96	04/01/97	03-09233	P389 H. B. Core Mach. #102-103	5.43
03/27/96	04/01/97	03-09233	P391 H. B. Sand Syst. #100-101	2.26
03/27/96	04/01/97	03-09233	P392 H. B. Sand Syst. #102-103	2.26
05/3/95	04/21/97	03-08580	P379 Cold Box Core Mach. #89- Plt. 1	0.92
03/27/96	04/21/97	03-09233	P390 Dip Dry Coating Operation	0.67
04/23/97	10/01/97	03-10003	P394 C. B. Core Mach. #104, 105, 106	1.40
04/23/97	10/01/97	03-10003	P396 Core Wash Dry Oven #4&5	0.83
08/01/97	12/01/97	03-10531	P401 C. B. Core Mach. #90- Plt. 1	1.13
09/01/97	12/01/97	03-10531	P402 Core Paste Oven @ CB #89 & 90	1.88
04/23/97	02/01/98	03-10003	P395 C. B. Core Mach. #107, 108, 109	1.40
01/11/98	07/11/98	03-10138	P397 C. B. Core Mach. #110, 111, 112	1.38
01/11/98	07/11/98	03-10138	P398 C. B. Core Mach. #113, 114, 115	1.38
05/27/98	07/11/98	03-10138	P399 Core Wash Dry Oven #6&7	0.83
05/27/98	07/11/98	03-10191	P400 Blast Cabinet- sample cast; Plt. 2E	1.10
04/01/99	01/01/00	03-13115	P403 Cold Box Core Machine #116	2.18
04/01/99	01/01/00	03-13115	P404 Cold Box Core Machine #117	2.18
04/01/99	01/01/00	03-13115	P405 Cold Box Core Machine #118	2.18
04/01/99	01/01/00	03-13115	P406 Core Dipping and Oven	3.27
05/01/00	07/01/00	03-13375	P430 Cold Box Core Machine #119	2.18
04/01/00	01/01/01	03-13364	P411 Castline#1	3.78
04/01/00	01/01/01	03-13364	P412 Castline #2	3.78
04/01/00	01/01/01	03-13364	P413 Castline#3	5.26
04/01/00	01/01/01	03-13364	P414 Castline#4	5.26
04/01/00	01/01/01	03-13364	P415-P418 Sand silos (1-4)	0.01
04/01/00	01/01/01	03-13364	P419 Sand Reclaim Furnace #1	3.40
04/01/00	01/01/01	03-13364	P420 Sand Reclaim Furnace #2	3.40
04/01/00	01/01/01	03-13364	P421 Sand Reclaim Furnace #3	4.73
04/01/00	01/01/01	03-13364	P422 Sand Reclaim Furnace #4	4.73
04/01/00	01/01/01	03-13364	P423 Receiving Furnace #1	4.46
04/01/00	01/01/01	03-13364	P424 Receiving Furnace #2	4.46

Permit Number: P0103623

Facility ID: 0320010001

Administrative Modification of PTI 03-13364 for emissions units P411, P412, P419 & P420

04/01/00	01/01/01	03-13364	P426 Holding Furnace #1	4.46
04/01/00	01/01/01	03-13364	P427 Holding Furnace #2	4.46
04/01/00	01/01/01	03-13364*	Preheater	0.07
04/01/00	01/01/01	03-13364*	HVAC unit	0.04
04/01/00	01/01/01	03-13364*	Cabinet Bead Blast units	0.063
TOTAL				155.81

\*unpermitted units

**PM EMISSIONS DECREASE (TPY)**

<u>SHUTDOWN DATE</u>	<u>OHIO EPA ID</u>	<u>SOURCE</u>	<u>DECREASE</u>
10/1/95	P119	Oven- Core- Vert #18	5.91
10/1/95	P285	Oven-Dip Dry- @ Vert. #18	0.28
10/1/95	P286	Definner- @ Vert. #18	3.28
02/05/96	P174	Line #5 Shakeout	5.53
05/17/96	P051	Iron Pouring-L #11	1.46
05/17/96	P060	Iron Pouring-L #20	1.46
05/17/96	P061	Mold Cooling #11-20	9.62
05/17/96	P062	Casting Separation- L#11	6.01
05/17/96	P071	Casting Separation- L#20	6.01
05/17/96	P072	Shakeout- L#11 & 12	2.62
05/17/96	P076	Shakeout- L#19 & 20	2.62
07/01/96	P133	Core Machine- HB #4	6.48
12/01/96	P108	Vertical Oven #6	7.23
01/08/97	P267	Core Machine- CB #31	0.37
04/23/97	P206	Core Coating w/ oven; Cam area	0.83
05/01/97	P133	Core Machine- HB #8	5.87
05/01/97	P251	Core Machine- HB #12	5.96
07/01/97	P102	Ovens Horiz- #1	12.04
07/01/97	P133	Core Machine- HB #10	7.43
07/15/97	P133	Core Machine- HB #7	7.71
07/31/97	P041-P046	Ajax Furnaces	61.56
09/01/97	*P139	Line #3 Casting Cooling	1.43
09/01/97	*P142	Line #3 Mold Cooling	2.74
09/01/97	*P173	Line #5 Mold Cooling	3.10
09/01/97	*P188	Cupola #4 Iron trough	2.17
01/01/98	P249	Core Machine- HB #25	11.93
01/02/98	P105	Vertical Oven #3	3.63
01/02/98	P111	Core Oven Vert. #10	2.30
01/02/98	P112	Core Oven Vert. #11	3.74
02/01/98	P133	Core Machine- HB #3	6.48
02/01/98	P133	Core Machine- HB #6	6.48
05/01/98	P133	Core Machine- HB #9	8.06
06/01/98	P185	Core Machine- HB #1	20.38
09/09/98	P267	Core Machines #30, 32	2.9
TOTAL			235.62

Permit Number: P0103623

Facility ID: 0320010001

Administrative Modification of PTI 03-13364 for emissions units P411, P412, P419 & P420

\* EU=s are still in operation but were previously uncontrolled. GMC Powertrain has installed control equipment on these units and is claiming credit for the actual reduction in emissions.

**VOC EMISSIONS INCREASE (TPY)**

<b>CONST. DATE</b>	<b>STARTUP DATE</b>	<b>PTI#</b>	<b>OEPA ID</b>	<b>SOURCE</b>	<b>INCREASE (TPY)</b>
08/03/94	08/14/95	03-07776	P370	Core Machine - C.B. #92	4.93
08/03/94	08/14/95	03-07776	P371	Core Machine - C.B. #91	4.93
04/21/95	08/01/95	03-08573	P378	Core Coating - FECO #5	6.36
05/03/95	08/01/95	03-08591	P383	Hot Box Core Mach. #96- Plt. 1	26.18
05/03/95	08/01/95	03-08591	P384	Hot Box Core Mach. #97- Plt. 1	26.18
05/03/95	08/01/95	03-08591	P385	Hot Box Core Mach. #98- Plt. 1	26.18
05/03/95	08/01/95	03-08591	P386	Hot Box Core Mach. #99- Plt. 1	26.18
05/03/95	10/22/96	03-08624	P387	Cold Box Core Mach. #93, 94, 95	7.40
03/27/96	06/02/97	03-09233	P388	H. B. Core Mach. #100-101	52.36
03/27/96	04/01/97	03-09233	P389	H. B. Core Mach. #102-103	6.33
05/03/95	04/21/98	03-08580	P379	Cold Box Core Mach. #89- Plt. 1	5.63
03/27/96	04/21/97	03-09233	P390	Dip Dry Coating Operation	3.49
04/23/97	10/01/97	03-10003	P394	C. B. Core Mach. #104, 105, 106	9.39
04/23/97	10/01/97	03-10003	P396	Core Wash Dry Oven #4&5	5.81
09/17/97	04/20/98	03-10531	P401	C. B. Core Mach. #90; Plt. 1	5.63
09/17/97	08/31/98	03-10531	P402	core paste oven @c.b.#89 & #90	3.49
04/23/97	02/01/98	03-10003	P395	C. B. Core Mach. #107, 108, 109	9.39
01/11/98	07/11/98	03-10138	P397	C. B. Core Mach. #110, 111, 112	9.39
01/11/98	07/11/98	03-10138	P398	C. B. Core Mach. #113, 114, 115	9.39
05/27/98	07/11/98	03-10138	P399	Core Wash Dry Oven #6&7	5.81
04/01/99	10/09/00	03-13115	P403	Cold Box Core Machine #116	4.93
04/01/99	10/09/00	03-13115	P404	Cold Box Core Machine #117	4.93
04/01/99	10/09/00	03-13115	P405	Cold Box Core Machine #118	4.93
04/01/99	10/09/00	03-13115	P406	Core Dipping/Oven	6.10
12/01/00	07/30/01	03-13375	P430	Cold Box Core Machine #119	4.93
04/01/00	02/01/01	03-13364	P407- P410	Bead Prep (1-4)	36.79
04/01/00	09/01/01	03-13364	P411	Castline#1	7.40
04/01/00	06/01/01	03-13364	P412	Castline #2	7.40
04/01/00	01/01/02	03-13364	P413	Castline#3	1.80
04/01/00	04/01/02	03-13364	P414	Castline#4	1.80
04/01/00	11/01/01	03-13364	P419	Sand Reclaim Furnace #1	1.20
04/01/00	09/01/01	03-13364	P420	Sand Reclaim Furnace #2	1.20
04/01/00	03/01/02	03-13364	P421	Sand Reclaim Furnace #3	0.57
04/01/00	04/01/02	03-13364	P422	Sand Reclaim Furnace #4	0.57
04/01/00	08/01/01	03-13364	P423	Receiving Furnace #1	0.15
04/01/00	03/01/02	03-13364	P424	Receiving Furnace #2	0.15
04/01/00	05/01/01	03-13364	P426	Holding Furnace #1	0.15
04/01/00	01/01/02	03-13364	P427	Holding Furnace #2	0.15
04/01/00	01/01/01	03-13364*		Preheater	0.05
04/01/00	01/01/01	03-13364*		HVAC unit	0.03
04/01/00	01/01/01	03-13364*		pattern-curing 4 units	4.60
04/01/00	01/01/01	03-13364*		pattern-making 4 units	4.60
04/01/00	01/01/01	03-13364*		pattern coating/drying stations (4)	0.08
				TOTAL	350.22

\*unpermitted units

Permit Number: P0103623

Facility ID: 0320010001

Administrative Modification of PTI 03-13364 for emissions units P411, P412, P419 & P420

**VOC EMISSIONS DECREASE (TPY)**

SHUTDOWN DATE	OEPA ID	SOURCE	DECREASE (TPY)
10/01/95	P119	Oven- Core- Vert #18	0.86
10/01/95	P285	Oven-Dip Dry- @ Vert. #18	23.53
07/01/96	P133	Core Machine- HB #4	7.62
12/01/96	P108	Vertical Oven #6	13.91
01/08/97	P267	Core Machine- CB #31	1.50
04/23/97	P206	Core Coating w/ oven; Cam area	18.85
12/01/98	P133	Core Machine- HB #8	6.90
05/01/98	P251	Core Machine- HB #12	7.01
09/26/97	P102	Ovens Horiz- #1	16.39
07/01/97	P103	Oven core- vert#1	15.09
07/15/97	P133	Core Machine- HB #7	9.07
05/29/00	P249	Core Machine- HB #25	14.03
01/02/98	P105	Vertical Oven #3	6.98
03/01/99	P111	Core Oven Vert. #10	18.72
04/01/99	P112	Core Oven Vert. #11	7.19
02/01/98	P133	Core Machine- HB #3	7.62
02/01/98	P133	Core Machine- HB #6	7.62
05/01/98	P133	Core Machine- HB #9	9.48
08/28/98	P185	Core Machine- HB #1	23.97
06/03/98	P185	Core Machine- HB #2	3.70
09/09/98	P267	Core Machines #30, 32	5.04
12/23/98	P034 - P039	preheater #1-#6	1.02
12/23/98	P052 - P059	MIP #12-#19	8.44
03/01/99	P250	Oven - Jensen	13.03
06/28/99	P296	Furnace - Wire Mesh-Holcoft	0.05
09/24/99	P231	Oven - Batch - North Vert #3	42.12
12/23/99	Z004	Experimental core facilities	0.19
09/25/00	P252	Core machine U900 8 of 10 units	23.36
09/25/00	P362	Core machine- shell #44	2.04
01/21/01	P261	Core machine - h.b. #24	7.43
03/23/01	P009	Sand system-shell&core	0.015
03/23/01	P025	Core machine-shelco #1-#22	83.82
03/23/01	P252	Core Machine - U900 (2 of 10 units)	5.84
03/23/01	P270	Core Machine #41-42	3.67
03/23/01	P275	Core Machine shell #1-8	47.49
03/23/01	P023	hot boxes #1,4,5 & 6	14.78
09/15/01	P293	core machine h.b. #43-44	8.03
09/15/01	P295	core machine h.b. #45-46	8.05
10/01/01	P184	core machine h.b. #14-15	6.76
10/15/01	Z015	core machine h.b. #51-52 (X3-2)	15.44
10/15/01	Z015	core machine h.b. #53-54 (X3-1)	15.40
10/15/01	Z018	hot box dip dry oven (X5-1)	3.285
11/15/01	P214	core machine h.b. #23	18.69
		TOTAL	554.03

The new change in emissions, due to the installation of the planned new source(s) in this PTI, over the contemporaneous time period, will be a net decrease of 79.81 TPY of PM10 and a net decrease 203.81 TPY of VOC.



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

**DRAFT**

**Air Pollution Permit-to-Install  
for  
GMC Powertrain Div.**

Facility ID: 0320010001  
Permit Number: P0103623  
Permit Type: Administrative Modification  
Issued: 12/3/2008  
Effective: To be entered upon final issuance





State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Air Pollution Permit-to-Install**  
 for  
 GMC Powertrain Div.

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**  
**Permit Number:** P0103623  
**Facility ID:** 0320010001

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0320010001

Facility Description: Foundry.

Application Number(s): M0000202

Permit Number: P0103623

Permit Description: Administrative modification to revise emission limits based on the results of emission testing. This permit action supersedes PTI 03-13364 issued 07/10/00 and administratively modified 01/06/04 for emissions units P411, P412, P419 and P420 only.

Permit Type: Administrative Modification

Permit Fee: \$2,000.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 12/3/2008

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

GMC Powertrain Div.  
State Route 281 East  
Defiance, OH 43512

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, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

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: P0103623

Permit Description: Administrative modification to revise emission limits based on the results of emission testing. This permit action supersedes PTI 03-13364 issued 07/10/00 and administratively modified 01/06/04 for emissions units P411, P412, P419 and P420 only.

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

**Group Name: Lost foam aluminum castlines**

<b>Emissions Unit ID:</b>	<b>P411</b>
Company Equipment ID:	CASTLINE CELL #1
Superseded Permit Number:	03-13364
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P412</b>
Company Equipment ID:	CASTLINE CELL #2
Superseded Permit Number:	03-13364
General Permit Category and Type:	Not Applicable

**Group Name: Lost foam sand reclaim furnaces**

<b>Emissions Unit ID:</b>	<b>P419</b>
Company Equipment ID:	SAND RECLAIM FURN #1
Superseded Permit Number:	03-13364
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P420</b>
Company Equipment ID:	SAND RECLAIM FURN #2
Superseded Permit Number:	03-13364
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103623

**Facility ID:** 0320010001

**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, Northwest 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, Northwest 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, Northwest 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, Northwest 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, Northwest 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, Northwest 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, Northwest 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**

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.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103623

**Facility ID:** 0320010001

**Effective Date:** To be entered upon final issuance

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest 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.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

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## **B. Facility-Wide Terms and Conditions**



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103623

**Facility ID:** 0320010001

**Effective Date:** To be entered upon final issuance

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103623

**Facility ID:** 0320010001

**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. Emissions Unit Group - Lost foam aluminum castlines: P411, P412,**

EU ID	Operations, Property and/or Equipment Description
P411	Castline (aluminum pouring, cooling, cleaning, & sand shakeout) - Cell#1 MODIFIED
P412	Castline (aluminum pouring, cooling, cleaning, & sand shakeout) - Cell #2 MODIFIED

**Administrative modification of PTI 03-13364 to revise VOC emission limitations [PTI 03-13364 was initially issued July 10, 2000 and administratively modified on January 6, 2004]**

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) d(8), d(9) and d(10).

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 3745-31-10 through 20	Control requirements See b)(2)a.
(b)	OAC rule 3745-31-05(D)	Duct Burner emissions:  Nitrogen oxide (NOx) emissions shall not exceed 13.61 tons per rolling 12-month period based on natural gas usage restrictions.  Regenerative Catalytic Oxidizer (RCO) emissions:  Nitrogen oxide (NOx) emissions shall not exceed 6.93 tons per rolling 12-month period based on natural gas usage restrictions.
(c)	OAC rule 3745-31-05(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-10 through 20 and OAC rule 3745-17-07(A).  Use of a baghouse  NOx emissions shall not exceed 2.27 lbs per hour (lbs/hr) and 7.15 tons per year (tpy).  Carbon monoxide (CO) emissions shall



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>not exceed 2.10 lbs/hr and 6.62 tons CO/yr.</p> <p>Volatile organic compounds (VOC) emissions shall not exceed 2.35 lbs/hr and 7.40 tpy (process emissions).</p> <p>Particulate matter emissions (PE) shall not exceed 1.20 lbs/hr and 3.78 tpy (process emissions).</p>
(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(A)	Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control technology (BACT) on this emissions unit. BACT has been determined to be the use of a control system meeting the following requirements for control of NOx emissions.
  - i. use of duct burner equipped with low NOx burners and designed to emit NOx at a rate of 80 lb/mmCf of natural gas burned.
  - ii. use of RCO equipped with low NOx burners and designed to emit NOx at a rate of 110 lb/mmCf of natural gas burned.
- b. In order to comply with Prevention of Significant Deterioration (PSD) Significant Impact Increment requirement for NOx, the permittee has requested federally enforceable restrictions to limit the potential to emit from the emissions units contained in this permit to install by limiting natural gas usage. Combined annual NOx emissions from the duct burners on emissions units P411 and P412 shall not exceed 13.61 tons/yr, based upon a rolling, 12-month restriction of natural gas usage [see c)(1)]. Combined annual NOx emissions from the RCO on emissions units P411 and P412 shall not exceed 6.93 tons/yr, based upon a rolling, 12-month restriction of natural gas usage [see c)(2)].
- c. The PE limitations are inclusive of and assumed to be PM10.

c) Operational Restrictions

- (1) The maximum annual natural gas usage on the duct burners for emissions units P411 and P412 shall not exceed 340.2 mmCf/yr, combined, based upon a rolling, 12-month summation of natural gas usage.



To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the natural gas usage levels specified in the following table for the duct burners for emissions units P411 and P412:

Month(s)	Maximum Cumulative natural gas usage (mmCf)
1	28
1-2	57
1-3	85
1-4	114
1-5	142
1-6	170
1-7	199
1-8	227
1-9	256
1-10	284
1-11	312
1-12	340.2

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual bead throughput shall be based upon a rolling 12-month summation of bead throughput.

- (2) The maximum annual natural gas usage on the RCO for emissions units P411 and P412 shall not exceed 126 mmCf/yr, combined, based upon a rolling, 12-month summation of natural gas usage.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the natural gas usage levels, for the RCO=s for emissions units P411 and P412, specified in the following table:

Month(s)	Maximum Cumulative natural gas usage (mmCf)
1	10.5
1-2	21.0
1-3	31.5
1-4	42.0
1-5	52.5
1-6	63.0
1-7	73.5
1-8	84.0
1-9	94.5
1-10	105.0
1-11	115.5
1-12	126.0



After the first 12 calendar months of operation under the provisions permit, compliance with the annual natural gas usage shall be based upon a rolling 12-month summation of the natural gas usage.

- (3) The temperature of the catalyst bed, in the RCO shall not be less than 650 degrees Fahrenheit when the emissions unit is in operation.
- (4) To ensure proper operation of the emissions unit, the permittee shall employ a interlock system that only allows operation of the emissions unit when the catalytic bed temperature in the RCO is in compliance with the operational restriction in c)(3). The interlock system shall only allow operation of the emissions unit when the monitoring devices associated with the operational restriction in c)(3) are operational (i.e. temperature monitor failure will shutdown the operation).
- (5) The maximum annual hours of operation for these emissions units shall not exceed 6300 hours.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions units P411 and P412, combined:
  - a. the quantity of natural gas combusted in all duct burners, in mmCf;
  - b. for the first 12 months of operations under the provisions of this permit, the cumulative monthly natural gas usage in the duct burners; and
  - c. after the first 12 months of operation under the provisions of this permit, the annual natural gas usage in the duct burners, based on a rolling, 12-month summation of the monthly natural gas usage.
- (2) In addition to the above information, the permittee shall also record the following information each month for emissions units P411 and P412, combined:
  - a. the calculated NOx emission rate, in tons per month, for all the duct burners;
  - b. for the first 12 months of operation under the provisions of this permit, the cumulative monthly NOx emission rate, from all the duct burners, in tons; and
  - c. after the first 12 months of operation, under the provisions of this permit, the annual NOx emission rate, from all the duct burners, based on a rolling, 12-month summation of the monthly NOx emissions.
- (3) The permittee shall maintain monthly records of the following information for emissions units P411 and P412, combined:
  - a. the quantity of natural gas combusted in all RCO=s, in mmCf;
  - b. for the first 12 months of operations under the provisions of this permit, the cumulative monthly natural gas usage in the RCO=s; and



- c. after the first 12 months of operation under the provisions of this permit, the annual natural gas usage in the RCO=s, based on a rolling, 12-month summation of the monthly natural gas usage.
- (4) In addition to the above information, the permittee shall also record the following information each month for emissions units P411 and P412, combined:
  - a. the calculated NOx emission rate, in tons per month, for all the RCO=s;
  - b. for the first 12 months of operation under the provisions of this permit, the cumulative monthly NOx emission rate, from all the RCO=s, in tons; and
  - c. after the first 12 months of operation, under the provisions of this permit, the annual NOx emission rate, from all the RCO=s, based on a rolling, 12-month summation of the monthly NOx emissions.
- (5) The permittee shall maintain monthly records that document any time periods when the interlock system associated with the RCO failed to operate in accordance with the requirements in c)(4) of this permit. The interlock system shall be installed, calibrated, operated and maintained in accordance with the manufacturer=s recommendations, with any modifications deemed necessary by the permittee.
- (6) The permittee shall perform weekly\* checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions, excluding water vapor, from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If the visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. The date and time of the visible emission observation;
  - b. The identification of the stack(s) observed;
  - c. The color of the emissions;
  - d. The total duration of any visible emission incident; and
  - e. The corrective actions, if any, taken eliminate the visible emissions.

\*once during each normal operating calendar week
- (7) The permittee shall maintain monthly records of the operating hours for this emissions unit.
- (8) The permit to install for this permit action as evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level



Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

- a. Pollutant: hexane  
TLV (mg/m3): 176  
Maximum Hourly Emission Rate (lbs/hr): 0.083  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 60  
MAGLC (ug/m3): 4,190
- b. Pollutant: styrene  
TLV (mg/m3): 85  
Maximum Hourly Emission Rate (lbs/hr): 0.21  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 65  
MAGLC (ug/m3): 2,024

(9) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the “Air Toxic Policy” is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the “Air Toxic Policy” will still be satisfied. If, upon evaluation, the permittee determines that the “Air Toxic Policy” will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the “Air Toxic Policy” include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

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



- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the “Air Toxic Policy” for the change.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. for the first 12 calendar months of operation, all exceedances of the allowable cumulative natural gas usage, for all the duct burners; and
  - b. the annual natural gas usage restrictions, for all the duct burners;
  - c. the emission limitation per rolling 12-month period, for all the duct burners.
  - d. for the first 12 calendar months of operation, all exceedances of the allowable cumulative natural gas usage, for all the RCOs; and
  - e. the annual natural gas usage restrictions, for all the RCOs;
  - f. the emission limitation per rolling 12-month period, for all the RCOs.
  - g. any time periods the ~~A~~interlock system~~@~~ associated with the RCOs did not operate in compliance with the requirements specified in c)(4).

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

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions, excluding water vapor, were observed from the stack(s) serving this emissions unit and (b) describe the corrective actions, if any, taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July of each year and shall cover the previous 6-month period.
- (3) The permittee shall submit annual reports which identify exceedances of the annual hours of operation restriction, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. The emissions testing shall be conducted within 6 months after start-up of this emissions unit.
  - b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for NO<sub>x</sub>, CO, VOC and PE.



- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for VOC, Methods 1-4 and either 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A; for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; for NO<sub>x</sub>, Methods 1-4 and 7 of 40 CFR Part 60, Appendix A; for CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.
  - d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Director or appropriate Ohio EPA District Office or local air agency.
- (2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit and “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).

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 unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee shall include in the report the operating parameters as required in (1)c. above.

- (3) Compliance with the emission limitations of this permit shall be determined in accordance with the following methods:
- a. Emission Limitation: 13.61 tons NO<sub>x</sub> per rolling 12-month period from the duct burner for emissions units P411 and P412, combined  
  
Applicable Compliance Method: Compliance with the rolling 12-month emission limitation shall be demonstrated by the record keeping requirements specified in d)(2).
  - b. Emission Limitations: 6.93 tons NO<sub>x</sub> per rolling 12-month period from the RCO for emissions units P411 and P412, combined  
  
Applicable Compliance Method: Compliance with the rolling 12-month emission limitation shall be demonstrated by the record keeping requirements specified in d)(4).
  - c. Emission Limitations: 2.27 lbs NO<sub>x</sub>/hr, 7.15 tons NO<sub>x</sub>/yr  
  
Applicable Compliance Method: The lb/hr NO<sub>x</sub> emission was determined by adding the lb/hr emissions from the RCO and duct burner. Compliance with the lb/hr limitation shall be determined through the testing required in f)(1) of the



terms and conditions of the permit. Ongoing compliance with the lb/hr limitation shall be demonstrated by the monitoring and record keeping requirements in d)(4) and through emission testing in accordance with Ohio EPA, Office of Air Pollution Control, Division of Engineering, Engineering Guide #16.

The tons/yr emission limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 6300 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- d. Emission Limitations: 2.1 lb CO/hr, 6.62 tons CO/yr

Applicable Compliance Method: The lb/hr CO emission rate was determined by adding the lb/hr emissions from the RCO and duct burner. Compliance with the lb/hr limitation shall be determined through the testing required in f)(1) of the terms and conditions of the permit. Ongoing compliance with the lb/hr limitation shall be demonstrated through emission testing in accordance with Ohio EPA, Office of Air Pollution Control, Division of Engineering, Engineering Guide #16.

The tons/yr emission limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 6300 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- e. Emission Limitations: 2.35 lbs VOC/hr, 7.40 tons VOC/yr

Applicable Compliance Method: Compliance with the lb/hr limitation shall be determined through the testing required in f)(1) of the terms and conditions of this permit.

The tons/yr emission limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 6300 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- f. Emission Limitations: 1.2 lbs PE/hr, 3.78 tons PE/yr

Applicable Compliance Method: Compliance with the lb/hr limitation shall be determined through the testing required in f)(1) of the terms and conditions of this permit.

The tons/yr emission limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 6300 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- g. Emission Limitation: 20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method: OAC rule 3745-17-03(B)(1)

- g) Miscellaneous Requirements



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install**

**Permit Number:** P0103623

**Facility ID:** 0320010001

**Effective Date:** To be entered upon final issuance

(1) None.



**2. Emissions Unit Group - Lost foam sand reclaim furnaces: P419, P420,**

EU ID	Operations, Property and/or Equipment Description
P419	Sand Reclaim Furnace - Cell #1 MODIFIED
P420	Sand Reclaim Furnace - Cell #2 MODIFIED

**Administrative modification of PTI 03-13364 to revise VOC emission limitations [Issued July 10, 2000 and administratively modified on January 6, 2004]**

- 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) d(6), d(7), and d(8).
- 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 3745-31-10 through 20	Control requirements See b)(2)a.
(b)	OAC rule 3745-31-05(D)	Nitrogen oxide (NOx) emissions shall not exceed 6.3 tons per rolling 12-month period based on natural gas usage restrictions.
(c)	OAC rule 3745-31-05(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-10 through 20 and OAC rule 3745-17-07(A).  Use of baghouse and VOC destruction associated with minimum furnace temperature.  NOx emissions shall not exceed 0.6 lbs per hour (lbs/hr) and 1.89 tons per year (tpy).  Carbon monoxide (CO) emissions shall not exceed 0.5 lbs/hr and 1.56 tons CO/yr  Volatile organic compounds (VOC) emissions shall not exceed 0.41 lb/hr and 1.29 tpy (process emissions).  Particulate emissions shall not exceed 1.08 lbs/hr and 3.40 tpy (process



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions).
(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(A)	Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control technology (BACT) on this emissions unit. BACT has been determined to be the use of a control system meeting the following requirements for control of NOx emissions:
  - i. Furnace equipped with low NOx burners and designed to emit NOx at a rate of 100 lbs/mmCf of natural gas burned.
- b. In order to comply with Prevention of Significant Deterioration (PSD) Significant Impact Increment requirement for NOx, the permittee has requested federally enforceable restrictions to limit the potential to emit from the emissions units contained in this permit to install by limiting natural gas usage. Combined annual NOx emissions from emissions units P419 and P420 shall not exceed 6.3 tons/yr based upon a rolling, 12-month summation of natural gas usage [see c)(4)].
- c. The 0.41 lb VOC/hr and 1.08 lbs PE/hr emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with these limitations.
- d. The PE limitations are inclusive of and assumed to be PM10.

c) Operational Restrictions

- (1) The permittee shall maintain the sand reclaim furnace at a minimum temperature of 1000 degrees Fahrenheit while in operation.
- (2) To ensure proper operation of the emissions unit, the permittee shall employ an interlock system that only allows operation of the emissions unit when the minimum temperature is in compliance with the operational restriction in c)(1). The interlock system shall only allow operation of the emissions unit when the monitoring devices associated with the operational restriction in c)(1) are operational (i.e. temperature monitor failure will shutdown the emissions units operation).
- (3) The maximum annual natural gas usage for emissions units P419 and P420 shall not exceed 126 mmCf/yr, combined, based upon a rolling, 12-month summation of natural gas usage.



To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the natural gas usage levels specified in the following table:

Month(s)	Maximum Cumulative natural gas usage (mmCf)
1	10.5
1-2	21.0
1-3	31.5
1-4	42.0
1-5	52.5
1-6	63.0
1-7	73.5
1-8	84.0
1-9	94.5
1-10	105.0
1-11	115.5
1-12	126.0

After the first 12 calendar months of operation under the provisions permit, compliance with the annual natural gas usage shall be based upon a rolling 12-month summation of the natural gas usage.

- (4) The maximum annual hours of operation for this emissions unit shall not exceed 6300 hours.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records that document any time periods when the interlock system failed to operate in accordance with the requirements in c)(2) of this permit. The interlock system shall be installed, calibrated, operated and maintained in accordance with the manufacturer=s recommendations, with any modifications deemed necessary by the permittee.
- (2) The permittee shall perform weekly\* checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions, excluding water vapor, from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If the visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. The date and time of the visible emission observation;
  - b. The identification of the stack(s) observed;
  - c. The color of the emissions;
  - d. The total duration of any visible emission incident; and



- e. The corrective actions, if any, taken eliminate the visible emissions.  
\*once during each normal operating calendar week
- (3) The permittee shall maintain monthly records of the following information for emissions units P419 and P420, combined:
  - a. the quantity of natural gas combusted, in mmCf;
  - b. for the first 12 months of operation under the provisions of this permit, the cumulative monthly natural gas usage; and
  - c. after the first 12 months of operation under the provisions of this permit, the annual natural gas usage, based on a rolling, 12-month summation of the monthly natural gas usage.
- (4) In addition to the above information, the permittee shall also record the following information each month for emissions units P419 and P420, combined:
  - a. the calculated NOx emission rate, in tons per month;
  - b. for the first 12 months of operation under the provisions of this permit, the cumulative monthly NOx emission rate, in tons; and
  - c. after the first 12 months of operation under the provisions of this permit, the annual NOx emission rate, based on a rolling, 12-month summation of the monthly NOx emissions.
- (5) The permittee shall maintain monthly records of the operating hours for this emissions unit.
- (6) The permit to install for this permit action as evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
  - a. Pollutant: hexane  
TLV (mg/m3): 176  
Maximum Hourly Emission Rate (lbs/hr): 0.083  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 60  
MAGLC (ug/m3): 4,190
  - b. Pollutant: styrene  
TLV (mg/m3): 85  
Maximum Hourly Emission Rate (lbs/hr): 0.21  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 65



MAGLC (ug/m3): 2,024

(7) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the “Air Toxic Policy” is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the “Air Toxic Policy” will still be satisfied. If, upon evaluation, the permittee determines that the “Air Toxic Policy” will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the “Air Toxic Policy” include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:



- a. for the first 12 calendar months of operation, all exceedances of the allowable cumulative natural gas usage;
- b. the annual natural gas usage restrictions;
- c. the emission limitation per rolling 12-month period; and
- d. any time period the Ainterlock system@ did not operate in accordance with the requirements specified in c)(2).

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

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions, excluding water vapor, were observed from the stack(s) serving this emissions unit and (b) describe the corrective actions, if any, taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July of each year and shall cover the previous 6-month period.
- (3) The permittee shall submit annual reports which identify exceedances of the annual hours of operation restriction, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. The emissions testing shall be conducted within 6 months after start-up of this emissions unit.
  - b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for NO<sub>x</sub>, CO, VOC and PE.
  - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: for VOC, Methods 1-4 and either 18, 25 or 25A of 40 CFR Part 60, Appendix A; for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; for NO<sub>x</sub>, Methods 1-4 and 7 of 40 CFR Part 60, Appendix A; for CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.
  - d. The test shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director or appropriate Ohio EPA District Office or local air agency.
  - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit and AIntent to Test@ notification to the appropriate Ohio EPA District Office or local air agency. The AIntent 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).

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 unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee shall include in the report the operating parameters as required in (1)c. above.

(2) Compliance with the emission limitations/usage restrictions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation: 6.3 tons NO<sub>x</sub> per rolling 12-month period

Applicable Compliance Method: Compliance with the rolling 12-month emission limitation shall be demonstrated by the recordkeeping requirements specified in d)(4).

b. Emission Limitations: 0.6 lbs NO<sub>x</sub>/hr, 1.89 tons NO<sub>x</sub>/yr

Applicable Compliance Method: Compliance with the lb/hr limitation shall be determined through the testing required in f)(1) of the terms and conditions of the permit. Ongoing compliance with the lb/hr limitation shall be demonstrated by the monitoring and recordkeeping requirements in section III and through emission testing in accordance with Ohio EPA, Office of Air Pollution Control, Division of Engineering, Engineering Guide #16.

The tons/yr emission limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 6300 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

c. Emission Limitations: 0.5 lb CO/hr, 1.56 tons CO/yr

Applicable Compliance Method: Compliance with the lb/hr limitation shall be determined through the testing required in f)(1) of the terms and conditions of the permit. Ongoing compliance with the lb/hr limitation shall be demonstrated through emission testing in accordance with Ohio EPA, Office of Air Pollution Control, Division of Engineering, Engineering Guide #16.

The tons/yr emission limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 6300 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.



- d. Emission Limitations: 0.41 lb VOC/hr, 1.29 tons VOC/yr

Applicable Compliance Method: Compliance with the lb/hr limitation shall be determined through the testing required in f)(1) of the terms and conditions of this permit.

The tons/yr emission limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 6300 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- e. Emission Limitations: 1.08 lbs PE/hr, 3.40 tons PE/yr

Applicable Compliance Method: Compliance with the lb/hr limitation shall be determined through the testing required in f)(1) of the terms and conditions of this permit.

The tons/yr emission limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 6300 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- f. Emission Limitation: 20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method: OAC rule 3745-17-03(B)(1)

- g) Miscellaneous Requirements

- (1) None.