



State of Ohio Environmental Protection Agency

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

5/28/2009

Dennis Daniels  
Alumalloy Metalcasting Co.  
33655 Walker Rd.  
Avon Lake, OH 44012

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0247035002  
Permit Number: P0104772  
Permit Type: Initial Installation  
County: Lorain

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc), from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc).

Sincerely,

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

Cc: Ohio EPA-NEDO

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





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

**FINAL**

**Air Pollution Permit-to-Install and Operate  
for  
Alumalloy Metalcasting Co.**

Facility ID: 0247035002  
Permit Number: P0104772  
Permit Type: Initial Installation  
Issued: 5/28/2009  
Effective: 5/28/2009  
Expiration: 5/28/2019





**Air Pollution Permit-to-Install and Operate**  
for  
Alumalloy Metalcasting Co.

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**  
**Permit Number:** P0104772  
**Facility ID:** 0247035002  
**Effective Date:** 5/28/2009

# Authorization

Facility ID: 0247035002  
Application Number(s): A0035532  
Permit Number: P0104772  
Permit Description: Aluminum foundry  
Permit Type: Initial Installation  
Permit Fee: \$6,600.00  
Issue Date: 5/28/2009  
Effective Date: 5/28/2009  
Expiration Date: 5/28/2019  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Alumalloy Metalcasting Co.  
33655 Walker Rd.  
Avon Lake, OH 44012

of a Permit-to-Install and Operate 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, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 43087  
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0104772  
Permit Description: Aluminum foundry

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

- |                                   |                 |
|-----------------------------------|-----------------|
| <b>Emissions Unit ID:</b>         | <b>F013</b>     |
| Company Equipment ID:             | Striko          |
| Superseded Permit Number:         |                 |
| General Permit Category and Type: | Not Applicable  |
| <b>Emissions Unit ID:</b>         | <b>P001</b>     |
| Company Equipment ID:             | Wheelabrator #1 |
| Superseded Permit Number:         |                 |
| General Permit Category and Type: | Not Applicable  |
| <b>Emissions Unit ID:</b>         | <b>P002</b>     |
| Company Equipment ID:             | Wheelabrator #2 |
| Superseded Permit Number:         |                 |
| General Permit Category and Type: | Not Applicable  |

**Group Name: Crucibles #1 through #9**

<b>Emissions Unit ID:</b>	<b>F001</b>
Company Equipment ID:	Crucible #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>F002</b>
Company Equipment ID:	Crucible #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>F003</b>
Company Equipment ID:	Crucible #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>F004</b>
Company Equipment ID:	Crucible #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>F005</b>
Company Equipment ID:	Crucible #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>F006</b>
Company Equipment ID:	Crucible #6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>F007</b>
Company Equipment ID:	Crucible #7
Superseded Permit Number:	



Type:	General Permit Category and	Not Applicable
<b>Emissions Unit ID:</b>		<b>F008</b>
	Company Equipment ID:	Crucible #8
	Superseded Permit Number:	
Type:	General Permit Category and	Not Applicable
<b>Emissions Unit ID:</b>		<b>F009</b>
	Company Equipment ID:	Crucible #9
	Superseded Permit Number:	
Type:	General Permit Category and	Not Applicable

**Group Name: Shell corers #1 through #3**

<b>Emissions Unit ID:</b>		<b>F010</b>
	Company Equipment ID:	Osbourne shell corer
	Superseded Permit Number:	
Type:	General Permit Category and	Not Applicable
<b>Emissions Unit ID:</b>		<b>F011</b>
	Company Equipment ID:	Osbourne shell corer
	Superseded Permit Number:	
Type:	General Permit Category and	Not Applicable
<b>Emissions Unit ID:</b>		<b>F012</b>
	Company Equipment ID:	Osbourne shell corer
	Superseded Permit Number:	
Type:	General Permit Category and	Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104772

**Facility ID:** 0247035002

**Effective Date:** 5/28/2009

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104772

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**Effective Date:** 5/28/2009

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104772

**Facility ID:** 0247035002

**Effective Date:** 5/28/2009

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104772

**Facility ID:** 0247035002

**Effective Date:** 5/28/2009

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104772

**Facility ID:** 0247035002

**Effective Date:** 5/28/2009

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



**1. F013, Striko melting and holding furnace rated at 800,000 Btu/hour**

**Operations, Property and/or Equipment Description:**

Striko melting and holding furnace rated at 800,000 Btu/hour

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. 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)	Particulate emissions (PE) shall not exceed 5.4 pounds per hour.  PE shall not exceed 23.7 tons per year.  Visible particulate emissions from any opening of the building housing this air contaminant source shall not exceed ten percent opacity as a three-minute average.  See Section b)(2)a below.
b.	OAC rule 3745-17-07(B)(1)	The requirements of this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-08(B)	The requirements of this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).



(2) Additional Terms and Conditions

- a. Best available control measures (BACM) shall be employed to minimize fugitive particulate emissions. BACM shall include, but not be limited to, containing operations within the building and using good engineering practices.
- b. Best Available Control Measures (BACM) required by OAC rule 3745-31-05(A)(3) that are employed for this emissions unit shall be considered adequate if compliance with the visible particulate emissions limitation contained in OAC rule 3745-31-05(A)(3) is achieved.
- c. As defined in 40 CFR 63.1503, any facility that only uses clean charge and does not operate sweat furnaces, thermal chip dryers, or scrap dryers/delacquering kilns/decorating kilns is not a secondary aluminum production facility.

c) Operational Restrictions

- (1) The permittee shall only use clean charge in this emissions unit as defined in 40 CFR Part 63, Subpart RRR:
- (2) Clean charge means furnace charge materials including molten aluminum, T-bar, sow, ingot, billet, pig and alloying elements; aluminum scrap known by the owner or operator to be entirely free of paints, coatings, and lubricants; uncoated/unpainted aluminum chips that have been thermally dried or treated by a centrifugal cleaner; aluminum scrap dried at 343 degrees C (650 degrees F) or higher; aluminum scrap delacquered/decoated at 482 degrees C (900 degrees F) or higher; and runaround scrap..

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 emissions of fugitive dust from the egress point (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. The location and color of the emissions;
  - b. Whether the emissions are representative of normal operations;
  - c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. The total duration of any visible emission incident; and
  - e. Any corrective actions taken to minimize or eliminate the visible emissions.

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



With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (3) The permittee shall maintain the following records:
  - a. Records that describe all of the charge materials.
  - b. Records that no sweat furnaces, thermal chip dryers, or scrap dryers/delacquering kilns/decorating kilns are in operation.

e) Reporting Requirements

- (1) The permittee shall include the following in the Permit Evaluation Report (PER): (a) identify all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible emissions.
- (2) The permittee shall report excursions that identify each day when "clean charge" is not used in this emissions unit.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from any opening of the building housing this air contaminant source shall not exceed ten percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the above emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).



b. Emission Limitation:

Particulate emissions (PE) shall not exceed 5.4 pounds per hour.

Applicable Compliance Method:

The hourly particulate emission rate may be estimated using the following equation:

$$E = (X \text{ tons/hr}) \times (4.3 \text{ lbs PE/ton})$$

Where

X = maximum quantity of metal processed, in ton(s) per hour: maximum calculated throughput is 1.25 tons per hour; and

4.3 lbs PE/ton = emissions factor from AP-42, Section 12.8, Table 12.8-2, uncontrolled smelting in reverberatory furnace.

If required, compliance with the above emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5.

c. Emission Limitation:

PE shall not exceed 23.7 tons per year.

Applicable Compliance Method:

Compliance with the annual particulate emission rate shall be determined by multiplying the calculated hourly emission rate above by 8760 hours per year and dividing by 2000 pounds to convert pounds to tons. Therefore, compliance with the annual emission rate will be assumed provided compliance is demonstrated with the hourly emission rate.

g) Miscellaneous Requirements

- (1) None.



**2. P001, Wheelabrator #1**

**Operations, Property and/or Equipment Description:**

Wheelabrator #1 controlled by a rotoclone

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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(F)	Particulate emissions (PE) shall not exceed 9.9 tons per year. See Section b)(2)a below.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack associated with this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by the rule.
c.	OAC rule 3745-17-11(B)(1)	PE from the stack associated with this emissions unit shall not exceed 2.58 pounds per hour.

(2) Additional Terms and Conditions

a. The permit for this air contaminant source takes into account the use of a rotoclone, whenever this air contaminant source is in operation, with a minimum control efficiency of 90% and a minimum capture efficiency of 100%, by weight for PE, as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).



c) Operational Restrictions

- (1) The rotoclone associated with this emissions unit shall be operated while this emissions unit is in operation.

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 emissions from the exhaust vent serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) The permittee shall include the following in the Permit Evaluation Report (PER): (a) identify all days during which any visible particulate emissions were observed from the exhaust vent serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The



permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitation:

PE from the stack associated with this emissions unit shall not exceed 2.58 pounds per hour.

Applicable Compliance Method:

The permittee may determine the hourly particulate emission rate using the following equation:

$$E = (X \text{ tons/hr}) \times (0.43 \text{ lb PE/ton})$$

Where

X = maximum quantity of metal processed, in ton(s) per hour: maximum calculated throughput is 0.5 tons per hour; and

0.43 lb PE/ton = emissions factor from emissions testing of a similar operation at Col-Pump Co. (Ohio EPA ID #02 15 01 0001) controlled by a baghouse.

If required, compliance with the above emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5.

b. Emission Limitation:

Particulate emissions shall not exceed 9.9 tons per year.

Applicable Compliance Method:

Compliance with the annual particulate emission rate shall be determined by multiplying the calculated hourly emission rate above by 8760 hours per year and dividing by 2000 pounds to convert pounds to tons.

c. Emission Limitation:

Visible particulate emissions from the stack associated with this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by the rule.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104772

**Facility ID:** 0247035002

**Effective Date:** 5/28/2009

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.



**3. P002, Wheelabrator #2**

**Operations, Property and/or Equipment Description:**

Wheelabrator #2 controlled by a rotoclone

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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(F)	Particulate emissions shall not exceed 9.9 tons per year. See Section b)(2)a below.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack associated with this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by the rule.
c.	OAC rule 3745-17-11(B)(1)	Particulate emissions from the stack associated with this emissions unit shall not exceed 5.0 pounds per hour.

(2) Additional Terms and Conditions

a. The permit for this air contaminant source takes into account the use of a rotoclone, whenever this air contaminant source is in operation, with a minimum control efficiency of 90% and a minimum capture efficiency of 100%, by weight for PE, as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).



c) Operational Restrictions

- (1) The rotoclone associated with this emissions unit shall be operated while this emissions unit is in operation.

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 emissions from the exhaust vent serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) The permittee shall include the following in the Permit Evaluation Report (PER): (a) identify all days during which any visible particulate emissions were observed from the exhaust vent serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The



permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitation:

Particulate emissions from the stack associated with this emissions unit shall not exceed 5.0 pounds per hour.

Applicable Compliance Method:

The permittee may determine the hourly particulate emission rate using the following equation:

$$E = (X \text{ tons/hr}) \times (0.43 \text{ lb PE/ton})$$

Where

X = maximum quantity of metal processed, in ton(s) per hour: maximum calculated throughput is 1.35 tons per hour; and

0.43 lb PE/ton = emissions factor from emissions testing of a similar operation at Col-Pump Co. (Ohio EPA ID #02 15 01 0001) controlled by a baghouse.

If required, compliance with the above emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5.

b. Emission Limitation:

Particulate emissions shall not exceed 9.9 tons per year.

Applicable Compliance Method:

Compliance with the annual particulate emission rate shall be determined by multiplying the calculated hourly emission rate above by 8760 hours per year and dividing by 2000 pounds to convert pounds to tons.

c. Emission Limitation:

Visible particulate emissions from the stack associated with this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by the rule.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104772

**Facility ID:** 0247035002

**Effective Date:** 5/28/2009

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.



**4. Emissions Unit Group - Crucibles #1 through #9: F001, F002, F003, F004, F005, F006, F007, F008, F009,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
F001	Crucible #1
F002	Crucible #2
F003	Crucible #3
F004	Crucible #4
F005	Crucible #5
F006	Crucible #6
F007	Crucible #7
F008	Crucible #8
F009	Crucible #9

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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)(a)(ii)	See Section b)(2)a below.
b.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any opening of the building housing this air contaminant source shall not exceed twenty percent opacity as a three-minute average.
c.	OAC rule 3745-17-08(B)	See Section b)(2)b below.



(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the uncontrolled potential to emit for particulate emissions is less than 10 tons per year.
- b. Reasonably available control measures (RACM) shall be employed to minimize fugitive particulate emissions. RACM shall include, but not be limited to, containing operations within the building and using good engineering practices to minimize fugitive particulate emissions.

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 emissions of fugitive dust from the egress point (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. The location and color of the emissions;
  - b. Whether the emissions are representative of normal operations;
  - c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. The total duration of any visible emission incident; and
  - e. Any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.



e) Reporting Requirements

- (1) The permittee shall include the following in the Permit Evaluation Report (PER): (a) identify all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible emissions.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from any opening of the building housing this air contaminant source shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the above emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.



**5. Emissions Unit Group - Shell corers #1 through #3: F010, F011, F012,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
F010	Osbourne shell corer #1
F011	Osbourne shell corer #2
F012	Osbourne shell corer #3

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. Section d)(3)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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)(a)(ii)	See Section b)(2)a below.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compounds (VOC) from this air contaminant source since the uncontrolled potential to emit for VOC is less than ten tons per year.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. The quantity of each type of sand (raw sand, proprietary sand with core binder, and shell core sand) used for the core making operation, in pounds; and



- b. The volatile organic compound (VOC) content of the shell core sand, in percent by weight.
- (2) The permittee shall collect and record the following information for each year:
  - a. The total VOC emission rate, calculated using the following equation:  
$$\text{VOC} = (\text{SCS} \times \% \text{VOC}) \times (1 \text{ ton}/2000 \text{ lbs})$$

Where

VOC = annual VOC emission rate, in tons per year;

SCS = annual quantity of shell core sand used for the core making process, in pounds per year; and

%VOC = VOC content of shell core sand, in percent by weight, as a decimal (i.e., 6% by weight would be 0.06).
  - (3) Modeling to demonstrate compliance with the “Toxic Air Contaminant Statute, 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.
- e) Reporting Requirements
  - (1) Annual emissions for this source shall be included in the Permit Evaluation Report (PER).
  - (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.  
  
[OAC rule 3745-15-03(B)(2) and OAC rule 3745-15-03(D)]
- f) Testing Requirements
  - (1) None.
- g) Miscellaneous Requirements
  - (1) None.