Ohio Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

8/16/2010

Certified Mail

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

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTAL
Facility ID: 0773010001
Permit Number: 07-00568
Permit Type: OAC Chapter 3745-31 Modification
County: Scioto

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

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

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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Portsmouth City Health Dept., Air Pollution Unit. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

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

50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 644 3020
614 | 644 3184 (fax)
www.epa.ohio.gov

Response to Comments

Response to comments for: Permit-To-Install

Facility ID:	0773010001
Facility Name:	OSCO Industries - Portsmouth Division
Facility Description:	Grey Iron Foundry
Facility Address:	Jct. Rt. 23 South & Rt. 52 East / West P.O. Box 1388 Portsmouth, OH 45662-1388 Scioto County
Permit #:	07-00568, OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Portsmouth Times on 04/28/2010. The comment period ended on 05/28/2010.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: **Craig Schmeisser, Sage Environmental, on behalf of Osco Industries, Portsmouth Division**
   a. Comment:: On the permit cover letter, "Yes" is provided in the MACT category. OSCO has an issued permit to avoid MACT, so the assumption is that this designation is to indicate the applicability of the Area Source Rule/GACT. Given Area Source Rules can require GACT or MACT technology this area should be clarified so the regulated community understands the meaning. Similarly in the Facility Wide Terms and Conditions 3. The word GACT should be substituted for MACT.

   b. Response: The appropriate revisions were made in Stars 2 to where the MACT category should no longer say “yes” on the permit cover letter. As requested, the word MACT was replaced with the word GACT for Facility Wide Term and Condition 3.

c. Comment: The tons per year under 7 of the permit strategy write-up only includes stack emissions. Though this is for informational purposes only, we suggest that "stack emissions only" be inserted.

d. Response: The permit strategy write-up is only issued with the draft permit and will not be included in the final permit to install document.

e. Comment: In Standard Terms and Conditions 2. b) there is an "its" in the first sentence that should be removed.

f. Response: Standard Term and Condition 2.b) was revised to read "….or any of its applicable requirements….".

g. Comment: In Facility Wide Terms and Conditions 4. I do not believe all individual emissions units at the facility have fugitive opacity BAT requirements that are more stringent than the Foundry Area Source Rule.Unless this is verified I would suggest we soften this language by stating "may".

h. Response: For Facility Wide Terms and Conditions 4, the term "…..However, the fugitive particulate emissions from individual emissions units at this facility are subject to opacity limitations under BAT which may be more stringent than the opacity limitation from 40 CFR 63.10895(e), the "are" was changed to "may be".

i. Comment: To simplify the permit and follow the intent of the Administrative Order, we should remove the designation of the wet scrubber and the associated limits throughout the permit but leave in the requirement to continue to operate the mist eliminator until the baghouse is installed. A schedule is included in the permit that discusses when the baghouse will be installed and the limits should be applicable following the baghouse installation.

j. Response: This chapter 31 modification shall become effective immediately upon final issuance and such permit cannot be issued without established emissions limitations for the wet scrubber which is currently in operation until the baghouse is installed and operating.

k. Comment: In 1.b)(2)b. the pyrometer term in 3745-21-08 is old technology. A thermocouple is used in its place with alarms to alert personnel of any temperature that is less than the minimum value. Until the rule and SIP is changed I would state that BAT is more stringent and move 1.d)(7) to 1.b.(d).

Response: Terms 1.b)(2)b. and 2.b)(2)b. were revised to add the following language: This facility employs a thermocouple instead of an indicating pyrometer to measure the temperature in the afterburner. Ohio EPA considers the thermocouple to be an equivalent device and plans to revise OAC rule 3745-21-08(D) in the future to allow for

an indicating pyrometer or equivalent device for measuring the temperature in the afterburner.

l. Comment: 1.d)(1) and (6) should include the words "if applicable" following "calibrated" as magnahelics cannot be calibrated.

m. Response: We do not agree with the statement that magnehelics cannot be calibrated, therefore, the suggested language will not be added.

n. Comment: In 1.d)(7), the allowance to exclude the first 15 minutes after going on-blast should be added (please see the Foundry MACT for this language).

o. Response: Terms 1.d)(7) and 2.d)(7) were revised to add the following language: Periods when the cupola is off blast and for 15 minutes after going on blast from an off blast condition are not included in the 15-minute average.

p. Comment: In 1.e)(4), first sentence "any" should replace "an".

q. Response: Terms 1.e)(4) and 2.e)(4) were revised to replace “an” with “any”.

r. Comment: In 1.e)(1)a. I could not find an established range for the baghouse pressure drop.

s. Response: The permit terms were revised to incorporate the baghouse language from the 2006 General Electric Lighting v. Jones decision, operation

t. Comment: We request Method 202 be removed as a referenced test method for PM10. Issues with this method have been documented.

u. Response: Per Section V.A.63 of the USEPA, Region V, Consent Order, the PTI application shall request the requirement to utilize Method 201A combined with Method 202, as codified at 40 CFR, Appendix M, to determine compliance with the established PM10 emission limit or other equivalent method as approved by Ohio EPA. Therefore, reference to Method 202 as a test method for PM10 cannot be removed. We recognize there have been documented issues with Method 202 and the permit language allows the use of equivalent methods as approved by the Portsmouth Local Air Agency.

v. Comment: The emission rates provided in 1.f)(1)(f), (g), (m) and (n) do not meet the emissions rates in the permit table (1.b)(1)). The emission table contains the appropriate rates.

w. Response: Terms 1.f)(1)(f), 1.f)(1)(g), 2.f)(1)(m), and 2.f)(1)(n) were revised to reflect the appropriate emission rates.

x. Comment: 1.f)(1)(j) the 30.48 tons per year should be changed to 30.68 tons per year.

y. Response: Term 1.f)(1)(j) was revised from 30.48 to 30.68 tons per year.

z. Comment: In 1.f)(2) it should be clarified that since the cupola is regulated by the Foundry Area Source Rule and the accompanying General Provisions, a Site Specific Test Plan is required to be submitted 60 days prior to the proposed test.

aa. Response: 1.f)(2) and 2.f)(2) have been revised to require a site-specific test plan be submitted within 60 days before the performance test is scheduled to take place.

Ohio Environmental Protection Agency

FINAL

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

Facility ID: 0773010001
Permit Number: 07-00568
Permit Type: OAC Chapter 3745-31 Modification
Issued: 8/16/2010
Effective: 8/16/2010

Ohio Environmental Protection Agency

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

Table of Contents

Authorization

Facility ID: 0773010001
Facility Description: Grey Iron Foundry
Application Number(s): A0007500
Permit Number: 07-00568
Permit Description: Chapter 31 modification to PTI 07-380, issued January 25, 1995, per the US EPA Administrative Consent Order.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $2,500.00
Issue Date: 8/16/2010
Effective Date: 8/16/2010

This document constitutes issuance to:

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

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: 07-00568
Permit Description: Chapter 31 modification to PTI 07-380, issued January 25, 1995, per the US EPA Administrative Consent Order.

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

Emissions Unit ID:	**P906**
Company Equipment ID:	WEST CUPOLA
Superseded Permit Number:	07-380
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P907**
Company Equipment ID:	East Cupola
Superseded Permit Number:	07-380
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) 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 Portsmouth City Health Dept., Air Pollution Unit.

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

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

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Compliance Requirements

a) 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 Portsmouth City Health Dept., Air Pollution Unit concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Portsmouth City Health Dept., Air Pollution Unit.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Portsmouth City Health Dept., Air Pollution Unit. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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 by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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 deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if 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.

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. Schedule for achieving compliance with the emission limitations established by OAC rule 3745-31-05(A)(3)

   The permittee shall implement the following compliance plan and time schedule for the installation of a baghouse to control emissions from P906 and P907:

a)	Evaluate control alternatives	Completed
b)	Solicit Bids	Completed
c)	Evaluate Bids	Completed
d)	Select vendor	Completed
e)	Start on-site construction	by June 1, 2010
f)	Finish on-site construction	by December 31, 2011
g)	Start-up / troubleshooting	by February 28, 2012 system to demonstrate final compliance
h)	Emission test	within 6 months of installation of the baghouse

3. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart ZZZZZ: P906 and P907. The complete GACT requirements, including the GACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Portsmouth Local Air Agency.

4. All of the emissions units located at this facility are subject to the facility-wide opacity limitation for fugitive emissions established in 40 CFR 63.10895(e). However, the fugitive particulate emissions from individual emissions units at this facility are subject to opacity limitations under BAT which may be more stringent than the opacity limitation from 40 CFR 63.10895(e).

C. Emissions Unit Terms and Conditions

1. P906, WEST CUPOLA

Operations, Property and/or Equipment Description:

25 tons per hour west iron cupola: melting of metallic materials to form molten gray iron castings controlled with an afterburner and venturi scrubber (to be replaced with a baghouse in accordance with compliance schedule in Part II, Section A.1). Chapter 31 modification to PTI 07-00380 to address USEPA administrative consent order and to raise the bottom of the cupola to increase the elevation of the furnace launderers that convey the molten iron with no increase in the hourly production rate.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) from the venturi scrubber stack shall not exceed 0.07 gr/dscf of exhaust gases and 9.78 pounds per hour. Particulate emissions less than 10 microns (PM10) from the venturi scrubber stack shall not exceed 0.0784 gr/dscf of exhaust gases and 10.96 pounds per hour. Carbon Monoxide (CO) emissions from the venturi scrubber stack shall not exceed 2.5 lbs per ton of molten iron and 62.44 pounds per hour. Sulfur Dioxide (SO_2) emissions from the venturi scrubber stack shall not exceed 259.04 pounds per hour and 414.47 tons per year. Nitrogen Oxides (NO_x) emissions from the venturi scrubber stack shall not exceed 11.24 pounds per hour and 17.98 tons per year. Volatile Organic Compound (VOC) emissions from the venturi scrubber stack shall exceed

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		6.74 pounds per hour and 10.79 tons per year. Lead (Pb) emissions from the venturi scrubber stack shall not exceed 0.25 pound per hour and 0.40 ton per year. PE emissions from the baghouse stack shall not exceed 0.07 gr/dscf of exhaust gases and 9.78 pounds per hour. PM10 from the baghouse stack shall not exceed 0.0784 gr/dscr of exhaust gases and 10.96 pounds per hour. CO emissions from the baghouse stack shall not exceed 2.5 lbs per ton of molten iron and 62.5 pounds per hour. SO_2 emissions from the baghouse stack shall not exceed 259.04 pounds per hour and 414.47 tons per year. NO_x emissions from the baghouse stack shall not exceed 11.24 pounds per hour and 17.98 tons per year. VOC emissions from the baghouse stack shall exceed 6.74 pounds per hour and 10.79 tons per year. Pb emissions from the baghouse stack shall not exceed 0.25 pound per hour and 0.40 ton per year. See b)(2)c. Visible PE of fugitive dust from any non-stack egress point serving this emissions unit shall not exceed 20% opacity as a 3-minute average.
b.	OAC rule 3745-31-05(D)	PE from the venturi scrubber stack shall not exceed 24.75 tons per year, as a rolling, 12-month summation. PM10 emissions from the venturi scrubber stack shall not exceed 30.68 tons per year, as a rolling, 12-month summation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		CO emissions from the venturi scrubber stack shall not exceed 99.90 tons per year, as a rolling, 12-month summation. PE from the baghouse stack shall not exceed 24.75 tons per year, as a rolling, 12- month summation. PM10 emissions from the baghouse stack shall not exceed 30.68 tons per year, as a rolling, 12-month summation. CO emissions from the baghouse stack shall not exceed 99.90 tons per year, as a rolling, 12-month summation. See b)(2)c.
c.	OAC rule 3745-17-07(A)	See b)(2)a.
d.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-18-06(E)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-21-08(D)	See b)(2)b.
g.	40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906) [In accordance with 40 CFR 63.10895(c), this emissions unit is a cupola metal melting furnace at an existing iron and steel foundry subject to the emissions limitations/control measures specified in this section.]	The permittee shall comply with either limit: 0.8 pound of PM per ton of metal charged; or 0.06 pound of total metal HAP per ton of metal charged. [40 CFR 63.10895(c)(1)]
h.	40 CFR 63.1-15 (40 CFR 63.10900)	Table 3 in Subpart ZZZZZ of 40 CFR Part 63 – Applicability of General Provisions to Subpart ZZZZZ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
i.	OAC rule 3745-114-01	This source is subject to 40 CFR Part 63, Subpart ZZZZZ, therefore, air toxics modeling for manganese and lead is not required.

(2) Additional Terms and Conditions

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

b. CO gases generated during the operation of this emissions unit shall be combusted at 1,300 degrees Fahrenheit for 0.3 second or greater in a direct-flame afterburner or equivalent device equipped with an indicating pyrometer which is positioned in the working area at the operator's eye level.

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

c. Once the permittee has completed the installation of a baghouse per the compliance schedule in section B.2, the emission limitations and terms and conditions pertaining to the venturi scrubber shall become void.

c) Operational Restrictions

(1) The permittee shall operate no more than one cupola at any time.

(2) Emissions units P906 and P907 shall not exceed the following:

a. 80,000 tons of molten iron produced per year; and

b. 5,600 hours of operation per year.

Compliance with the operational restrictions shall be based upon a rolling,12-month summation of the production of molten iron and hours of operation for emission units P906 and P907, combined. The permittee has sufficient records to begin calculating and tracking compliance with this rolling, 12-month restriction upon issuance of this permit.

(3) The pressure drop across the scrubber shall be continuously maintained at a value of not less than 28 inches of water at all times while the emissions unit is in operation.

The scrubber water flow rate shall be continuously maintained at a value of not less than 125 gallons per minute at all times while the emissions unit is in operation.

(4) The permittee shall not employ coke with greater than 4% sulfur content in this emissions unit.

(5) The permittee shall maintain and operate the mist eliminator following the venturi scrubber.

(6) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations , instructions and operating manuals.

(2) The permittee shall collect and record the following information each day:

a. the pressure drop across the scrubber, in inches of water, once per shift;
b. the scrubber water flow rate, in gallons per minute, once per shift;
c. the total operating hours for this emissions unit; and
d. the downtime for the capture (collection) system, control device, monitoring equipment when the associated emissions unit is in operation.

(3) The permittee shall maintain monthly records of the following information for this emissions unit:

a. the total tons of molten iron produced, in tons;
b. the total hours of operation;
c. the total PE, in tons;
d. the total PM10 emissions, in tons;
e. the total CO emissions, in tons;
f. the rolling, 12-month summation of the tons of molten iron produced, in tons;
g. the rolling, 12-month summation of the hours of operation;
h. the rolling, 12-month summation of the PE, in tons;
i. the rolling, 12-month summation of the PM10 emissions, in tons; and
j. the rolling, 12-month summation of the CO emissions, in tons.

(4) The permittee shall maintain monthly records of all periods of time during which the west cupola (P906) and the east cupola (P907) are in operation at the same time.

(5) The permittee shall maintain monthly records of the following:

a. fuel analysis report from the supplier demonstrating the sulfur content of the coke; and

b. average SO_2 emissions, in lbs/hr, (1.2 times % sulfur times the maximum tons/hour of iron produced).

(6) The permittee shall properly install, operate and maintain equipment to monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promply investigate the cause of the deviation. The permittee

shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

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

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

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Portsmouth Local Air Agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(7) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion zone temperature of the afterburner when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated (or replaced, as appropriate), operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall inspect and clean the burners of the afterburner at least once per year to ensure proper fuel mixing and efficient combustion and record each annual inspection and any related maintenance activity.

The permittee shall maintain daily records, when the emissions unit is in operation, of all 3-hour blocks of time during which the average temperature of the afterburner was less than 1,300 degrees Fahrenheit measured in the combustion zone. The permittee shall install an alarm device that alerts the permittee when the temperature measured in the combustion zone falls below the specified limitation and maintain a record of each such event. Periods when the cupola is off blast and for 15 minutes after going on blast from an off blast condition are not included in the 15-minute average.

(8) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive PE from egress points (i.e.,

building windows, building doors, roof monitors, charge doors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicated 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 indicated 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.

(9) The permittee shall record any corrective actions and the cause, if known, when the requirements of OAC rule 3745-21-08 are not met in accordance with the Corrective Action Plan for the Cupola Carbon Monoxide Air Pollution Control System, as submitted to the Portsmouth Local Air Agency on March 12, 2008, or any subsequent revisions.

(10) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

e) Reporting Requirements

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

a. all periods of time during which the pressure drop across the baghouse was outside of the range specified by the manufacturer;
b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or corrective action;
e. all 3-hour periods of time during which the afterburner combustion zone temperature was below the minimum temperature value specified above;

f. all periods of time during which the scrubber parameters were not maintained at or above the required levels specified above;
g. any exceedance of the rolling, 12-month hours of operation restriction specified above;
h. any exceedance of the rolling, 12-month restriction for the tons of molten iron produced specified above.
i. any exceedance of the rolling, 12-month emission limitation for PE specified above;
j. any exceedance of the rolling, 12-month emission limitation for PM10 specified above; and
k. any exceedance of the rolling, 12-month emission limitation for CO specified above.

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

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

(2) The permittee shall submit quarterly written reports that identify the following:

a. all days during which any visible fugitive PE were observed from the from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

b. describe any corrective actions taken to minimize or eliminate the visible fugitive PE.

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

(3) The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

(4) The permittee shall notify the Portsmouth local air agency in writing of any monthly record showing any periods of time during which the west cupola (P906) and the east cupola (P907) were in operation at the same time. The notification shall include a copy of such record and shall be sent to the Portsmouth local air agency within 30 days following the end of the calendar month.

(5) The permittee shall notify the Portsmouth local air agency in writing of any record showing the sulfur content exceeded the restriction in c)(4). The notification shall include a copy of such record and shall be sent to the Portsmouth Local Air Agency within 30 days following the end of the calendar month.

(6) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

f) Testing Requirements

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

a. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

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

b. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the gr/dscf and lbs/hr emission limitations shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the records required in Section d)(3) above.

c. Emission Limitation:

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

Applicable Compliance Method:

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

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the records required in Section d)(3) above.

d. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the lbs/ton of molten iron emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the records required in Section d)(3) above.

e. Emission Limitation:

SO_2 emissions from the venturi scrubber stack shall not exceed 259.04 lbs/hr and 414.47 tons per year.

Applicable Compliance Method:

Compliance with the lbs/hr limitation may be assumed due to the high allowable emission limitation and the relatively low amount of SO_2 emitted from the process.

If required, compliance with the lbs/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6C.

Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor of 10.37 pounds/ton metal charged times the maximum tons of metal charged per year, divided by 2,000 pounds/ton. The SO_2 emission factor was back calculated from the OAC rule 3745-18-06(E)(2) allowable calculated from the maximum process weight rate of 25 TPH.

f. Emission Limitation:

NO_x emissions from the venturi scrubber stack shall not exceed 11.24 lbs/hr and 17.98 tons per year.

Applicable Compliance Method:

If required, compliance with the lbs/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E.

Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor of 0.45 pound/ton metal charged times the maximum tons of metal charged per year, divided by 2,000 pounds/ton. The NOx emission factor was obtained from Fire 6.25 in addition to a 4.5 safety factor.

g. Emission Limitation:

VOC emissions from the venturi scrubber stack shall not exceed 6.74 lbs/hr and 10.79 tons per year.

Applicable Compliance Method:

If required, compliance with the lbs/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

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

h. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 29.

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

i. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the gr/dscf emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the records required in Section d)(3) above.

j. Emission Limitation:

PM10 from the baghouse stack shall not exceed 0.0784 gr/dscf of exhaust gases, 10.96 pounds per hour and 30.68 tons per year.

Applicable Compliance Method:

Compliance with the gr/dscf emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 40 CFR Part 51, Appendix M, Methods 201A and 202.

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the records required in Section d)(3) above.

k. Emission Limitation:

CO emissions from the baghouse stack shall not exceed 2.5 lbs per ton of molten iron and 99.90 tons per year.

Applicable Compliance Method:

If required, compliance with the lbs/ton of molten iron emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the records required in Section d)(3) above.

l. Emission Limitation:

SO_2 emissions from the baghouse stack shall not exceed 259.04 lbs/hr and 414.47 tons per year.

Applicable Compliance Method:

Compliance with this limitation may be assumed due to the high allowable emission limitation and the relatively low amount of SO_2 emitted from the process.

If required, compliance with the lbs/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6C.

Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor of 10.37 pounds/ton metal charged times the maximum tons of metal charged per year, divided by 2,000 pounds/ton. The SO_2 emission factor was back calculated from the OAC rule 3745-18-06(E)(2) allowable calculated from the maximum process weight rate of 25 TPH.

m. Emission Limitation:

NO_x emissions from the baghouse stack shall not exceed 11.24 lbs/hr and 17.98 tons per year.

Applicable Compliance Method:

If required, compliance with the lbs/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E.

Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor of 0.45 pound/ton metal charged times the maximum tons of metal charged per year, divided by 2,000 pounds/ton. The

NOx emission factor was obtained from Fire 6.25 in addition to a 4.5 safety factor.

n. Emission Limitation:

VOC emissions from the baghouse stack shall not exceed 6.74 lbs/hr and 10.79 tons per year.

Applicable Compliance Method:

If required, compliance with the lbs/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

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

o. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 29.

Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor of 0.0300 pound/ton metal charged times the maximum tons of metal charged per year, divided by 2,000 pounds/ton. The Pb emission factor is based on Foundry MACT testing from GM and Waupacu.

p. Emission Limitation:

The permittee shall comply with either limit:

0.8 pound of PM per ton of metal charged; or

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

Applicable Compliance Method:

If required, compliance shall be determined through emission testing using Methods 1 through 5 of 40 CFR Part 60, Appendix A, for PE and Methods 1 through 4 and 29 of 40 CFR Part 60, Appendix A, for total metal HAPs.

q. Emission Limitation:

Visible PE of fugitive dust from any non-stack egress point serving this emissions unit shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

(2) Emission Testing Requirements

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

a. The emission testing shall be conducted within 6 months of installation of the baghouse.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PM and PM10.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

For PE: Methods 1 through 5 of 40 CFR Part 60, Appendix A; and for PM10: Methods 1 through 4 and Methods 201A and 202, as codified at 40 CFR Part 60 Appendix A and 40 CFR Part 51, Appendix M, respectively.

Equivalent U.S. EPA-approved test methods may be used with prior approval from the Portsmouth Local Air Agency.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Portsmouth Local Air Agency.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Portsmouth 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 Portsmouth Local Air Agency's refusal to accept the results of the emission test(s).

The permittee shall submit a site-specific test plan and the intent to test notification in accordance with 40 CFR 63.7(c)(2)(iv) and 40 CFR 63.7(b), respectively, within 60 days before the performance test is scheduled to take place.

Personnel from the Portsmouth Local Air Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a

valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test and submitted to the Portsmouth Local Air Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Portsmouth Local Air Agency.

(3) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

g) Miscellaneous Requirements

(1) None.

2. P907, East Cupola

Operations, Property and/or Equipment Description:

25 tons per hour east iron cupola: melting of metallic materials to form molten gray iron castings controlled with a afterburner and venturi scrubber (to be replaced with a baghouse in accordance with compliance schedule in Part II, Section A.1). Chapter 31 modification to PTI 07-00380 to address USEPA administrative consent order and to raise the bottom of the cupola to increase the elevation of the furnace launderers that convey the molten iron with no increase in the hourly production rate.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) from the wet scrubber exhaust shall not exceed 0.07 gr/dscf of exhaust gases and 9.78 pounds per hour. Particulate emissions less than 10 microns (PM10) from the venturi scrubber stack shall not exceed 0.0784 gr/dscf of exhaust gases and 10.96 pounds per hour. Carbon Monoxide (CO) emissions from the venturi scrubber stack shall not exceed 2.5 lbs per ton of molten iron. Sulfur Dioxide (SO_2) emissions from the venturi scrubber stack shall not exceed 259.04 lbs/hr and 414.47 tons per year. Nitrogen Oxides (NO_x) emissions from the venturi scrubber stack shall not exceed 11.24 lbs/hr and 17.98 tons per year. Volatile Organic Compound (VOC)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions from the venturi scrubber stack shall exceed 10.11 lbs/hr and 16.18 tons per year. Lead (Pb) emissions from the venturi scrubber stack shall not exceed 0.25 pound per hour and 0.40 ton per year. PE emissions from the baghouse stack shall not exceed 0.07 gr/dscf of exhaust gases and 9.78 pounds per hour. PM10 from the baghouse stack shall not exceed 0.0784 gr/dscr of exhaust gases and 10.96 pounds per hour. CO emissions from the baghouse stack shall not exceed 2.5 lbs per ton of molten iron and 62.5 pounds per hour. SO_2 emissions from the baghouse stack shall not exceed 259.04 pounds per hour and 414.47 tons per year. NO_x emissions from the baghouse stack shall not exceed 11.24 pounds per hour and 17.98 tons per year. VOC emissions from the baghouse stack shall exceed 6.74 pounds per hour and 10.79 tons per year. Lead (Pb) emissions from the baghouse stack shall not exceed 0.25 pound per hour and 0.40 ton per year. See b)(2)c. Visible PE of fugitive dust from any non-stack egress point serving this emissions unit shall not exceed 20% opacity as a 3-minute average.
b.	OAC rule 3745-31-05(D)	PE from the wet scrubber exhaust shall not exceed 24.75 tons per year, as a rolling, 12- month summation. PM10 emissions from the venturi scrubber stack shall not exceed 30.68

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		tons per year, as a rolling, 12-month summation. CO emissions from the venturi scrubber stack shall not exceed 99.90 tons per year, as a rolling, 12-month summation. See b)(2)c.
c.	OAC rule 3745-17-07(A)	See b)(2)a.
d.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-18-06(E)(2)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-21-08(D)	See b)(2)b.
g.	40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906) [In accordance with 40 CFR 63.10895(c), this emissions unit is a cupola metal melting furnace at an existing iron and steel foundry subject to the emissions limitations/control measures specified in this section.]	The permittee shall comply with either limit: 0.8 pound of PM per ton of metal charged; or 0.06 pound of total metal HAP per ton of metal charged. [40 CFR 63.10895(c)(1)]
h.	40 CFR 63.1-15 (40 CFR 63.10900	Table 3 in to Subpart ZZZZZ of 40 CFR Part 63 – Applicability of General Provisions to Subpart ZZZZZ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
i.	OAC rule 3745-114-01	This source is subject to 40 CFR Part 63, Subpart ZZZZZ, therefore, air toxics modeling for manganese and lead is not required.

(2) Additional Terms and Conditions

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

b. CO gases generated during the operation of this emissions unit shall be combusted at 1,300 degrees Fahrenheit for 0.3 second or greater in a direct-flame afterburner or equivalent device equipped with an indicating pyrometer which is positioned in the working area at the operator's eye level.

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

c. Once the permittee has completed the installation of a baghouse per the compliance schedule in Section B.2, the emission limitations and terms and conditions pertaining to the venturi scrubber shall become void.

c) Operational Restrictions

(1) The permittee shall operate no more than one cupola at any time.

(2) Emissions units P906 and P907 shall not exceed the following:

a. 80,000 tons of molten iron produced per year; and

b. 5,600 hours of operation per year.

Compliance with the operational restrictions shall be based upon a rolling,12-month summation of the production of molten iron and hours of operation for emission units P906 and P907, combined. The permittee has sufficient records to begin calculating and tracking compliance with this rolling, 12-month restriction upon issuance of this permit.

(3) The pressure drop across the scrubber shall be continuously maintained at a value of not less than 28 inches of water at all times while the emissions unit is in operation.

The scrubber water flow rate shall be continuously maintained at a value of not less than 125 gallons per minute at all times while the emissions unit is in operation.

(4) The permittee shall not employ coke with greater than 4% sulfur content in this emissions unit.

(5) The permittee shall maintain and operate the mist eliminator following the venturi scrubber.

(6) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations , instructions and operating manuals.

(2) The permittee shall collect and record the following information each day:

a. the pressure drop across the scrubber, in inches of water, once per shift;
b. the scrubber water flow rate, in gallons per minute, once per shift;
c. the total operating hours for this emissions unit; and
d. the downtime for the capture (collection) system, control device, monitoring equipment when the associated emissions unit is in operation.

(3) The permittee shall maintain monthly records of the following information for this emissions unit:

a. the total tons of molten iron produced, in tons;
b. the total hours of operation;
c. the total PE, in tons;
d. the total PM10 emissions, in tons;
e. the total CO emissions, in tons;
f. the rolling, 12-month summation of the tons of molten iron produced, in tons;
g. the rolling, 12-month summation of the hours of operation;
h. the rolling, 12-month summation of the PE, in tons;
i. the rolling, 12-month summation of the PM10 emissions, in tons; and
j. the rolling, 12-month summation of the CO emissions, in tons.

(4) The permittee shall maintain monthly records of all periods of time during which the west cupola (P906) and the east cupola (P907) are in operation at the same time.

(5) The permittee shall maintain monthly records of the following:

a. fuel analysis report from the supplier demonstrating the sulfur content of the coke; and

b. average SO_2 emissions, in lbs/hr, (1.2 times % sulfur times the maximum tons/hour of iron produced).

(6) The permittee shall properly install, operate and maintain equipment to monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

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

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective

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

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

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Portsmouth Local Air Agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(7) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion zone temperature of the afterburner when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated (or replaced, as appropriate), operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall inspect and clean the burners of the afterburner at least once per year to ensure proper fuel mixing and efficient combustion and record each annual inspection and any related maintenance activity.

The permittee shall maintain daily records, when the emissions unit is in operation, of all 3-hour blocks of time during which the average temperature of the afterburner was less than 1,300 degrees Fahrenheit measured in the combustion zone. The permittee shall install an alarm device that alerts the permittee when the temperature measured in the combustion zone falls below the specified limitation and maintain a record of each such event. Periods when the cupola is off blast and for 15 minutes after going on blast from an off blast condition are not included in the 15-minute average.

(8) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive PE from egress points (i.e., building windows, building doors, roof monitors, charge doors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicated 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 indicated 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.

(9) The permittee shall record any corrective actions and the cause, if known, when the requirements of OAC rule 3745-21-08 are not met in accordance with the Corrective Action Plan for the Cupola Carbon Monoxide Air Pollution Control System, as submitted to the Portsmouth Local Air Agency on March 12, 2008, or any subsequent revisions.

(10) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

e) Reporting Requirements

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

a. all periods of time during which the pressure drop across the baghouse was outside of the range specified by the manufacturer;
b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or corrective action;
e. all 3-hour periods of time during which the afterburner combustion zone temperature was below the minimum temperature value specified above;
f. all periods of time during which the scrubber parameters were not maintained at or above the required levels specified above;
g. any exceedance of the rolling, 12-month hours of operation restriction specified above;
h. any exceedance of the rolling, 12-month restriction for the tons of molten iron produced specified above.
i. any exceedance of the rolling, 12-month emission limitation for PE specified above;
j. any exceedance of the rolling, 12-month emission limitation for PM10 specified above; and

k. any exceedance of the rolling, 12-month emission limitation for CO specified above.

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

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

(2) The permittee shall submit quarterly written reports that identify the following:

a. all days during which any visible fugitive PE were observed from the from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

b. describe any corrective actions taken to minimize or eliminate the visible fugitive PE.

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

(3) The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

(4) The permittee shall notify the Portsmouth local air agency in writing of any monthly record showing any periods of time during which the west cupola (P906) and the east cupola (P907) were in operation at the same time. The notification shall include a copy of such record and shall be sent to the Portsmouth local air agency within 30 days following the end of the calendar month.

(5) The permittee shall notify the Portsmouth local air agency in writing of any record showing the sulfur content exceeded the restriction in c)(4). The notification shall include a copy of such record and shall be sent to the Portsmouth local air agency within 30 days following the end of the calendar month.

(6) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

f) Testing Requirements

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

a. <u>Emission Limitation:</u>

Visible PE from any stack shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

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

b. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the gr/dscf and lbs/hr emission limitations shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the records required in Section d)(3) above.

c. Emission Limitation:

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

Applicable Compliance Method:

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

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the records required in Section d)(3) above.

d. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the lbs/ton of molten iron emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the records required in Section d)(3) above.

e. Emission Limitation:

SO_2 emissions from the venturi scrubber stack shall not exceed 259.04 lbs/hr and 414.47 tons per year.

Applicable Compliance Method:

If required, compliance with the lbs/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6C.

Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor of 10.37 pounds/ton metal charged times the maximum tons of metal charged per year, divided by 2,000 pounds/ton. The SO_2 emission factor was back calculated from the OAC rule 3745-18-06(E)(2) allowable calculated from the maximum process weight rate of 25 TPH.

f. Emission Limitation:

NO_x emissions from the venturi scrubber stack shall not exceed 11.24 lbs/hr and 17.98 tons per year.

Applicable Compliance Method:

If required, compliance with the lbs/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E.

Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor of 0.45 pound/ton metal charged times the maximum tons of metal charged per year, divided by 2,000 pounds/ton. The NOx emission factor was obtained from Fire 6.25 in addition to a 4.5 safety factor.

g. Emission Limitation:

VOC emissions from the venturi scrubber stack shall not exceed 6.74 lbs/hr and 10.79 tons per year.

Applicable Compliance Method:

If required, compliance with the lbs/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

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

h. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 29.

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

i. Emission Limitation:

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

Applicable Compliance Method:

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

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the records required in Section d)(3) above.

j. Emission Limitation:

PM10 from the baghouse stack shall not exceed 0.0784 gr/dscf of exhaust gases, 10.96 pounds per hour and 30.68 tons per year.

Applicable Compliance Method:

Compliance with the gr/dscf emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 40 CFR Part 51, Appendix M, Methods 201A and 202.

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the records required in Section d)(3) above.

k. Emission Limitation:

CO emissions from the baghouse stack shall not exceed 2.5 lbs per ton of molten iron and 99.90 tons per year.

Applicable Compliance Method:

If required, compliance with the lbs/ton of molten iron emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the records required in Section d)(3) above.

l. Emission Limitation:

SO_2 emissions from the baghouse stack shall not exceed 259.04 lbs/hr and 414.47 tons per year.

Applicable Compliance Method:

If required, compliance with the lbs/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6C.

Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor of 10.37 pounds/ton metal charged times the maximum tons of metal charged per year, divided by 2,000 pounds/ton. The SO_2 emission factor was back calculated from the OAC rule 3745-18-06(E)(2) allowable calculated from the maximum process weight rate of 25 TPH.

m. Emission Limitation:

NO_x emissions from the baghouse stack shall not exceed 11.24 lbs/hr and 17.98 tons per year.

Applicable Compliance Method:

If required, compliance with the lbs/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E.

Compliance with the annual emission limitation shall be demonstrated by multiplying the emission factor of 0.45 pound/ton metal charged times the maximum tons of metal charged per year, divided by 2,000 pounds/ton. The NOx emission factor was obtained from Fire 6.25 in addition to a 4.5 safety factor.

n. Emission Limitation:

VOC emissions from the baghouse stack shall not exceed 6.74 lbs/hr and 10.79 tons per year.

Applicable Compliance Method:

If required, compliance with the lbs/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

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

o. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the lb/hr emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 29.

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

p. Emission Limitation:

The permittee shall comply with either limit:

0.8 pound of PM per ton of metal charged; or

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

Applicable Compliance Method:

If required, compliance shall be determined through emission testing using Methods 1 through 5 of 40 CFR Part 60, Appendix A, for PE and Methods 1 through 4 and 29 of 40 CFR Part 60, Appendix A, for total metal HAPs.

q. Emission Limitation:

Visible PE of fugitive dust from any non-stack egress point serving this emissions unit shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

(2) Emission Testing Requirements

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

a. The emission testing shall be conducted within 6 months of installation of the baghouse.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PM and PM10.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

For PE: Methods 1 through 5 of 40 CFR Part 60, Appendix A and for PM10: Methods 1 through 4 and Methods 201A and 202, as codified at 40 CFR Part 60 Appendix A and 40 CFR Part 51, Appendix M, respectively.

Equivalent U.S. EPA-approved test methods may be used with prior approval from the Portsmouth Local Air Agency.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Portsmouth Local Air Agency.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Portsmouth 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 Portsmouth Local Air Agency's refusal to accept the results of the emission test(s).

The permittee shall submit a site-specific test plan and the intent to test notification in accordance with 40 CFR 63.7(c)(2)(iv) and 40 CFR 63.7(b), respectively, within 60 days before the performance test is scheduled to take place.

Personnel from the Portsmouth Local Air Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test and submitted to the Portsmouth Local Air Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Portsmouth Local Air Agency.

(3) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

g) Miscellaneous Requirements

(1) None.