



Environmental  
Protection Agency

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

12/20/2010

Certified Mail

Mr. Todd Rouse  
Defiance Casting Operations  
26427 State Route 281 East  
Defiance, OH 43512

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0320010001  
Permit Number: P0106622  
Permit Type: Initial Installation  
County: Defiance

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

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](http://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 Ohio EPA DAPC, Northwest District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

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





## Response to Comments

Response to comments for: Permit-To-Install

Facility ID:	0320010001
Facility Name:	Defiance Casting Operations
Facility Description:	Foundry.
Facility Address:	State Route 281 East Defiance, OH 43512 Defiance County
Permit #:	P0106622, Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Crescent-News on 11/17/2010. The comment period ended on 12/17/2010.	
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.

**No public comments received.**





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Defiance Casting Operations**

Facility ID: 0320010001  
Permit Number: P0106622  
Permit Type: Initial Installation  
Issued: 12/20/2010  
Effective: 12/20/2010





Division of Air Pollution Control
Permit-to-Install
for
Defiance Casting Operations

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## Authorization

Facility ID: 0320010001  
Facility Description: Foundry.  
Application Number(s): A0039827, A0040347, A0040477  
Permit Number: P0106622  
Permit Description: Installation of four precision sand mold lines.  
Permit Type: Initial Installation  
Permit Fee: \$52,000.00  
Issue Date: 12/20/2010  
Effective Date: 12/20/2010

This document constitutes issuance to:

Defiance Casting Operations  
State Route 281 East  
Defiance, OH 43512

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0106622  
Permit Description: Installation of four precision sand mold lines.

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

**Emissions Unit ID: F009**  
Company Equipment ID: Mold fill pouring #2  
Superseded Permit Number: P0104241  
General Permit Category and Type: Not Applicable

**Group Name: PSand Attrition Mills**

<b>Emissions Unit ID:</b>	<b>P478</b>
Company Equipment ID:	Precision Sand Mod #1 Attrition Mill and Waste Sand Conveyor
Superseded Permit Number:	P0104241
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P546</b>
Company Equipment ID:	PSand Mod #2 Attrition Mill and Waste Sand Conveyor
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P547</b>
Company Equipment ID:	PSand Mod #3 Attrition Mill and Waste Sand Conveyor
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P548</b>
Company Equipment ID:	PSand Mod #4 Attrition Mill and Waste Sand Conveyor
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: PSand CL Blast Cabinets**

<b>Emissions Unit ID:</b>	<b>P479</b>
Company Equipment ID:	PSand Mod #1 Cylinder Liner Blast Cabinet
Superseded Permit Number:	P0104241
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P510</b>
Company Equipment ID:	PSand Mod #3 Cylinder Liner Blast Cabinet
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P511</b>
Company Equipment ID:	PSand Mod #4 Cylinder Liner Blast Cabinet
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P549</b>
Company Equipment ID:	PSand Mod #2 Cylinder Liner Blast Cabinet
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: PSand Casting Cooling Tunnel**

<b>Emissions Unit ID:</b>	<b>P474</b>
Company Equipment ID:	PSand Mod #1 Casting Cooling Tunnel
Superseded Permit Number:	P0104241
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P512</b>
Company Equipment ID:	PSand Mod #2 Casting Cooling Tunnel
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P513</b>
Company Equipment ID:	PSand Mod #3 Casting Cooling Tunnel
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P514</b>
Company Equipment ID:	PSand Mod #4 Casting Cooling Tunnel
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: PSand Final Shot Blast**

<b>Emissions Unit ID:</b>	<b>P476</b>
Company Equipment ID:	PSand Mod #1 Final Shot Blast
Superseded Permit Number:	P0104241
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P515</b>
Company Equipment ID:	PSand Mod #2 Final Shot Blast
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P516</b>
Company Equipment ID:	PSand Mod #3 Final Shot Blast
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P517</b>
Company Equipment ID:	PSand Mod #4 Final Shot Blast
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: PSand Finishing**

<b>Emissions Unit ID:</b>	<b>P475</b>
Company Equipment ID:	PSand Mod #1 DeFlash, DeCore, DeGate
Superseded Permit Number:	P0104241
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P541</b>
Company Equipment ID:	PSand Mod #2 DeFlash, DeCore, DeGate
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P542</b>
Company Equipment ID:	PSand Mod #3 DeFlash, DeCore, DeGate
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P543</b>
Company Equipment ID:	PSand Mod #4 DeFlash, DeCore, DeGate
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: PSand Mod#1 Core Machines**

<b>Emissions Unit ID:</b>	<b>P464</b>
Company Equipment ID:	PSand Mod #1 Core Mach #1
Superseded Permit Number:	P0106013
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P465</b>
Company Equipment ID:	PSand Mod #1 Core Mach #2
Superseded Permit Number:	P0106013
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P466</b>
Company Equipment ID:	PSand Mod #1 Core Mach #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P467</b>
Company Equipment ID:	PSand Mod #1 Core Mach #4
Superseded Permit Number:	P0106013
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P468</b>
Company Equipment ID:	PSand Mod #1 Core Mach #5
Superseded Permit Number:	P0106013
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P469</b>
Company Equipment ID:	PSand Mod #1 Core Mach #6
Superseded Permit Number:	P0106013
General Permit Category and Type:	Not Applicable

**Group Name: PSand Mod#3 Core Machines**

<b>Emissions Unit ID:</b>	<b>P525</b>
Company Equipment ID:	PSand Mod #3 Core Mach #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P528</b>
Company Equipment ID:	PSand Mod #3 Core Mach #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P531</b>
Company Equipment ID:	PSand Mod #3 Core Mach #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P534</b>
Company Equipment ID:	PSand Mod #3 Core Mach #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P536</b>
Company Equipment ID:	PSand Mod #3 Core Mach #6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P539</b>
Company Equipment ID:	PSand Mod #3 Core Mach #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: PSand Mod#4 Core Machines**

<b>Emissions Unit ID:</b>	<b>P526</b>
Company Equipment ID:	PSand Mod #4 Core Mach #1
Superseded Permit Number:	

General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P529</b>
Company Equipment ID:	PSand Mod #4 Core Mach #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P532</b>
Company Equipment ID:	PSand Mod #4 Core Mach #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P535</b>
Company Equipment ID:	PSand Mod #4 Core Mach #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P537</b>
Company Equipment ID:	PSand Mod #4 Core Mach #6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P540</b>
Company Equipment ID:	PSand Mod #4 Core Mach #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: PSand Mold Cooling**

<b>Emissions Unit ID:</b>	<b>P472</b>
Company Equipment ID:	PSand Mod #1 Mold Cooling Line
Superseded Permit Number:	P0106013
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P521</b>
Company Equipment ID:	PSand Mod #2 Mold Cooling Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P522</b>
Company Equipment ID:	PSand Mod #3 Mold Cooling Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P523</b>
Company Equipment ID:	PSand Mod #4 Mold Cooling Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: PSand Mold Fill**

<b>Emissions Unit ID:</b>	<b>F008</b>
Company Equipment ID:	PSand Mod #1 Pouring
Superseded Permit Number:	P0104241
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F010</b>
Company Equipment ID:	PSand Mod #2 Pouring
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F011</b>
Company Equipment ID:	PSand Mod #3 Pouring
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F012</b>
Company Equipment ID:	PSand Mod #4 Pouring

Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: PSand Mold Shakeout**

<b>Emissions Unit ID:</b>	<b>P473</b>
Company Equipment ID:	PSand Mod #1 Mold Shakeout
Superseded Permit Number:	P0106013
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P518</b>
Company Equipment ID:	PSand Mod #2 Mold Shakeout
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P519</b>
Company Equipment ID:	PSand Mod #3 Mold Shakeout
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P520</b>
Company Equipment ID:	PSand Mod #4 Mold Shakeout
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: PSand Receiving/Storage**

<b>Emissions Unit ID:</b>	<b>P906</b>
Company Equipment ID:	PSand Mod #1 receiving/storage
Superseded Permit Number:	P0104241
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P907</b>
Company Equipment ID:	PSand Mod #2 receiving/storage
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P908</b>
Company Equipment ID:	PSand Mod #3 receiving/storage
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P909</b>
Company Equipment ID:	PSand Mod #4 receiving/storage
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: PSand Stack Melters**

<b>Emissions Unit ID:</b>	<b>P544</b>
Company Equipment ID:	PSand Mod 3 Stack Melter
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P545</b>
Company Equipment ID:	PSand Mod 4 Stack Melter
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: PSand Storage/Assembly**

<b>Emissions Unit ID:</b>	<b>P801</b>
Company Equipment ID:	PSand Mod #1 storage/assembly
Superseded Permit Number:	P0106013
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P802</b>
Company Equipment ID:	PSand Mod #2 storage/assembly

Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P803</b>
Company Equipment ID:	PSand Mod #3 storage/assembly
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P804</b>
Company Equipment ID:	PSand Mod #4 storage/assembly
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: PSand Waste Sand Load-Out**

<b>Emissions Unit ID:</b>	<b>F007</b>
Company Equipment ID:	PSand Mod #1 & #2 Waste Sand Load-out
Superseded Permit Number:	P0106013
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F013</b>
Company Equipment ID:	PSand Mod #3 & #4 Waste Sand Load-out
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: Psand Mod#2 Core Machines**

<b>Emissions Unit ID:</b>	<b>P524</b>
Company Equipment ID:	PSand Mod #2 Core Mach #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P527</b>
Company Equipment ID:	PSand Mod #2 Core Mach #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P530</b>
Company Equipment ID:	PSand Mod #2 Core Mach #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P533</b>
Company Equipment ID:	PSand Mod #2 Core Mach #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P538</b>
Company Equipment ID:	PSand Mod #2 Core Mach #5
Superseded Permit Number:	
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 Ohio EPA DAPC, Northwest District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. Scheduled Maintenance/Malfunction Reporting**

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

## **6. Compliance Requirements**

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

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

## **7. Best Available Technology**

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

## **8. Air Pollution Nuisance**

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

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### **10. Applicability**

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed 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) 3.
2. Emissions units F007 through F012, P801 through P804, P464 through P479, P510 through P549, and P906 through P909 as described in this Permit to Install (PTI), is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency (U.S. EPA). The authority to apply and enforce the PSD regulations has been delegated to the Ohio EPA.

In accordance with 40 CFR 124.15, 124.19, and 124.20 the following shall apply:

- i. The effective date of the permit shall be 30 days after the service of notice to any public commenter's the final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and
- ii. If an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Appeals will be addressed to:  
United State Environmental Protection Agency  
Environmental Appeals Board  
401 M Street, SW (MC-113do)  
Washington, DC 21460

3. The emissions units contained in this permit to install were evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit application. The Ohio EPA's "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
  - a) the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
    - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
    - ii. TEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical

Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b) The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c) This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC).
- d) The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic contaminant: formaldehyde  
TLV (mg/m<sup>3</sup>): 0.368  
Maximum Hourly Emission Rate (lbs/hr): 0.72  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 6.27  
MAGLC (ug/m<sup>3</sup>): 6.46

Toxic contaminant: m,p-Xylene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 4.62  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 61.19  
MAGLC (ug/m<sup>3</sup>): 10,337

Toxic contaminant: phenol  
TLV (mg/m<sup>3</sup>): 19  
Maximum Hourly Emission Rate (lbs/hr): 4.92  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 53.73  
MAGLC (ug/m<sup>3</sup>): 458.21

Toxic contaminant: naphthalene  
TLV (mg/m<sup>3</sup>): 54  
Maximum Hourly Emission Rate (lbs/hr): 2.17  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 28.49  
MAGLC (ug/m<sup>3</sup>): 1,248.31

Toxic contaminant: o-xylene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lbs/hr): 0.43  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 4.94  
MAGLC (ug/m<sup>3</sup>): 10,337.90

Toxic contaminant: cumene  
TLV (mg/m<sup>3</sup>): 245  
Maximum Hourly Emission Rate (lbs/hr): 8.98

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 141.7  
MAGLC (ug/m3): 5852.07

Toxic contaminant: acetophenone  
TLV (mg/m3): 49.141  
Maximum Hourly Emission Rate (lbs/hr): 1.04  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17.82  
MAGLC (ug/m3): 1,170.02

Toxic contaminant: alpha-Methylstyrene  
TLV (mg/m3): 241  
Maximum Hourly Emission Rate (lbs/hr): 1.28  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2.21  
MAGLC (ug/m3): 5754.21

The permittee, has demonstrated that emissions of m,p-xylene, phenol, naphthalene, o-xylene, cumene, acetophenone and alpha-Methylstyrene, from the emissions units contained in PTI P0106622 are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic contaminant in accordance with ORC 3704.03(F).

The permittee, having demonstrated that emissions of formaldehyde from the emissions units contained in PTI P0106622, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

4. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a) changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b) changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c) physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a

"modification" or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

5. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":
  - a) a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxics modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b) the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with ORC 3704.03(F);
  - c) a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d) the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.
6. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
7. The permittee shall submit quarterly reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

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

**1. F009, Precision Sand Mod (Pilot line) Mold Fill Pouring Station**

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

mold fill pouring station (pilot line)

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 operation(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 are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-10 through 20	Volatile organic compound (VOC) emissions shall not exceed 0.11 ton per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.  See b)(2)a.
b.	OAC rule 3745-31-05(D)	Particulate emissions (PE) shall not exceed 0.01 tpy, based upon a rolling, 12-month summation of the monthly emissions.  Particulate matter less than or equal to 10 microns in size (PM <sub>10</sub> ) shall not exceed 0.02 tpy, based upon a rolling, 12-month summation of the monthly emissions.  See b)(2)b. and b)(2)f.
c.	OAC rule 3745-17-08(B)(3)	See b)(2)c.
d.	OAC rule 3745-17-07(B)	Visible PE shall not exceed 20% opacity, as a three-minute average, except as provided by rule.
e.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)d.
f.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)e.

(2) Additional Terms and Conditions

- a. Based on the "Prevention of Significant Deterioration" (PSD) analysis conducted to ensure the application of "Best Available Control Technology" (BACT), it has been determined that no control technologies for VOC were cost effective.
- b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) for PE and PM<sub>10</sub>. The PTE is being restricted such that emission increase for PM<sub>10</sub> allowed for in this permit action (P0106622) will be below the Prevention of Significant Deterioration (PSD) "significant threshold" applicability level of 15 tpy (for PM<sub>10</sub>). The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2), which require control equipment and process control.
- c. The permittee shall utilize reasonable available control measures (RACM) that are sufficient to minimize or eliminate visible emissions of fugitive dust. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure to ensure compliance:
  - i. Building enclosure.

Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.

- d. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by the U.S. EPA.

- e. This paragraph applies once the U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

BAT requirements under OAC rule 374-31-05(A)(3)(a), as effective December 1, 2006, do not apply to VOC and PM<sub>10</sub> emissions from this air contaminant source since the potential to emit for each is less than ten tons per year taking into

account the federally enforceable requirements established under OAC rule 3745-31-05(D). BAT requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

- f. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size (PM<sub>2.5</sub>) are being implemented through the PM<sub>10</sub> Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that PM<sub>10</sub> is a reasonable surrogate for PM<sub>2.5</sub>, all emissions of PM<sub>10</sub> will be considered PM<sub>2.5</sub>.

c) Operational Restrictions

- (1) The maximum castings processed by this emissions unit shall not exceed 21,240, based upon a rolling, 12-month summation of the monthly castings produced.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the number of castings specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative quantity of Castings Processed</u>
1	1770
1-2	3540
1-3	5310
1-4	7080
1-5	8850
1-6	10,620
1-7	12,390
1-8	14,160
1-9	15,930
1-10	17,700
1-11	19,470
1-12	21,240

After the first 12 calendar months of operation following the issuance of this permit, compliance with the quantity of castings processed restriction shall be based upon a rolling, 12-month summation of the monthly quantity of castings processed in this emissions unit.

d) Monitoring and/or Record keeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
  - a. the number of castings processed;

- b. for the first 12 months of operation following the issuance of this permit, the cumulative quantity of castings processed; and
  - c. after the first 12 months of operation following the issuance of this permit, the quantity of castings processed, based on a rolling, 12-month summation of the monthly quantity of castings processed.
- (2) The permittee shall perform weekly\* checks when this emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) of the building containing 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 emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.
- \*once during each normal calendar week
- e) Reporting Requirements
- (1) The permittee shall submit semiannual written reports that identify:
- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) of the building containing these emissions units; and
  - b. any corrective actions taken to minimize or eliminate the visible emissions.
- These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (2) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following:
- a. for the first 12 calendar months of operation following the issuance of this permit, the restriction on the maximum allowable cumulative quantity of castings processed; and
  - b. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month restriction on the quantity of castings processed.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

The maximum annual quantity of castings processed shall not exceed 21,240 per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(1).

b. Emission Limitation:

VOC emissions shall not exceed 0.11 tpy, based upon a rolling, 12 month summation of the monthly emissions.

Applicable Compliance Method:

The emission limitation was established by multiplying the company-supplied emission factor of 0.12 pound per ton (lb/ton) of aluminum by the annual restriction of 21,240 castings processed, by 0.0875 ton of aluminum per casting and, then dividing by 2000 lbs/ton. If required, testing to verify the accuracy of the emission factor shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A. Alternative or equivalent methods can be used with the approval of the director.

c. Emission Limitation:

PE shall not exceed 0.01 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The emission limitation was established by multiplying the company-supplied emission factor of 0.012 lb/ton of aluminum by the annual restriction of 21,240 castings processed, by 0.0875 ton of aluminum per casting and dividing by 2000 lb/ton and dividing by 2000 lb/ton. If required, testing to verify the accuracy of the emission factor shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A. Alternative or equivalent methods can be used with the approval of the director.

d. Emission Limitation:

PM<sub>10</sub> shall not exceed 0.02 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The emission limitation was established by multiplying the company-supplied emission factor of 0.023 lb/ton of aluminum by the annual restriction of 21,240 castings processed, by 0.0875 ton of aluminum per casting and dividing by 2000 lb/ton and dividing by 2000 lbs/ton. If required, testing to verify the accuracy of the emission factor shall be demonstrated based on the results of emission testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M or as amended. Alternative or equivalent methods can be used with the approval of the director.

e. Emission Limitation:

Visible PE from the egress points of the building containing this emissions unit shall not exceed 20% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources" or as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. Alternative or equivalent methods can be used with the approval of the director.

g) Miscellaneous Requirements

(1) None.

**2. Emissions Unit Group - PSand Attrition Mills: P478, P546, P547, P548,**

EU ID	Operations, Property and/or Equipment Description
P478	Precision Sand Mod #1 Pan Conveyor, Attrition Mill, and Waste Sand Conveyor
P546	Precision Sand Mod #2 Pan Conveyor, Attrition Mill, and Waste Sand Conveyor
P547	Precision Sand Mod #3 Pan Conveyor, Attrition Mill, and Waste Sand Conveyor
P548	Precision Sand Mod #4 Pan Conveyor, Attrition Mill, and Waste Sand Conveyor

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) b)(1)e., b)(1)f. and b)(2)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-10 through 20	<u>From each emissions unit individually:</u> Volatile organic compound (VOC) emissions shall not exceed 0.08 pound per ton (lb/ton) of aluminum and 4.59 tons per year(tpy), based upon a rolling, 12-month summation of the monthly emissions.  See b)(2)a.
b.	OAC rule 3745-31-05(D)	<u>From each emissions unit individually:</u>  Particulate emissions (PE) shall not exceed 0.04 lb/ton of aluminum and 2.29 tpy, based upon a rolling, 12-month summation of the monthly emissions.  Particulate matter less than or equal to 10 microns in size (PM <sub>10</sub> ) shall not exceed 0.08 lb/ton and 4.59 tpy, based upon a rolling, 12-month summation of the monthly emissions.  Visible PE shall not exceed 10% opacity, as a six-minute average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)b. and b)(2)e.
c.	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D).
d.	OAC rule 3745-31-05(A)(3), as effective 11/31/01	See b)(2)c.
e.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.
f.	OAC rule 3745-114-01 ORC 3704.03(F)	See B.2. – Facility-wide Terms and Conditions

(2) Additional Terms and Conditions

- a. Based on the "Prevention of Significant Deterioration" (PSD) analysis conducted to ensure the application of "Best Available Control Technology" (BACT), it has been determined that no control technologies for VOC were cost effective.
- b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting the potentials to emit (PTE) for PE and PM<sub>10</sub>. The PTE is being restricted such that the emission increase for PM<sub>10</sub> allowed for in this permit action (P0106622) will be below the Prevention of Significant Deterioration (PSD) "significant threshold" applicability level of 25 (for PE) and 15 tpy (for PM<sub>10</sub>). The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2), which require control equipment and process control:
  - i. PM<sub>10</sub> emissions shall not exceed 0.08 lb/ton and 4.59 tpy, based upon a rolling, 12-month summation of the monthly emissions; and
  - ii. PE shall not exceed 0.04 lb/ton of aluminum and 2.29 tpy, based upon a rolling, 12-month summation of the monthly emissions.
- c. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the

December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- d. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the VOC and PM<sub>10</sub> emissions from this air contaminant source since the controlled potential to emit (PTE) is less each than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(D). BAT requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

- e. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size (PM<sub>2.5</sub>) are being implemented through the PM<sub>10</sub> Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that PM<sub>10</sub> is a reasonable surrogate for PM<sub>2.5</sub>, all emissions of PM<sub>10</sub> will be considered PM<sub>2.5</sub>.

c) Operational Restrictions

- (1) The maximum annual sand usage for each individual emissions unit shall not exceed 114,696 tons, based upon a rolling, 12-month summation of the monthly quantities of sand used.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the sand usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Sand Usage (tons)</u>
1	10,000
1-2	20,000
1-3	30,000
1-4	40,000
1-5	50,000
1-6	60,000
1-7	70,000
1-8	80,000
1-9	90,000

1-10	100,000
1-11	110,000
1-12	114,696

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual sand usage restriction shall be based upon a rolling, 12-month summation of the monthly quantity of sand processed.

- (2) The permittee shall operate the baghouses at all times when these emissions units are in operation.
- d) Monitoring and/or Record keeping Requirements
- (1) The permittee shall collect and record the following information each month for these emissions units, individually:
    - a. the amount of sand processed, in tons;
    - b. for the first 12 months of operation following the issuance of this permit, the cumulative quantity of sand processed, in tons; and
    - c. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly amount of sand processed.

\*The amount of sand processed through this emissions unit is equivalent to the amount of sand received in emissions units P906, P907, P908 and P909, combined. The monitoring and record keeping associated with the sand processed in emissions units P906, P907, P908 and P909 can be used to fulfill the requirements in this section.
  - (2) The permittee shall perform weekly\* checks when these emissions units are in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions, excluding water vapor, 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 date and time of the visible emission observation;
    - b. the identification of the stack observed;
    - c. the color of the emissions;
    - d. the total duration of any visible emission observation; and
    - e. the corrective actions, if any, taken to eliminate the visible emissions.

\*once during each normal calendar week
  - (3) The permittee shall maintain records documenting any time periods when these emissions unit were in operation and the baghouses were not operating.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following:
  - a. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative sand usage restriction; and
  - b. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month sand usage restriction.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions, excluding water vapor, were observed from the stacks serving these emissions units and (b) describe the corrective actions, if any, taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (3) The permittee shall submit deviation (excursion) reports that identify any time periods when these emissions units were in operation and the baghouses were not operating. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for all four (4) precision sand modules in accordance with the following requirements:
  - a. The emissions testing shall be conducted over four (4) consecutive years, beginning no later than 180 days after achieving the maximum production rate at which P sand module 1 (emissions units P478), P sand module 2 (emissions units P546), P sand module 3 (emissions units P547) or P sand module 4 (emissions units P548), will be operated, whichever comes first. The permittee shall test a minimum of one module per year.
  - b. The emission testing shall be conducted to demonstrate compliance with the following:
    - i. for VOC - 0.08 lb/ton of sand.
  - c. The following test methods shall be employed to demonstrate compliance with the above emission limitations:
    - i. For total VOC, Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 18, 25, or 25A (as applicable) of 40 CFR Part 60, Appendix A for determining total VOC mass emissions.

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

- d. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- e. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, NWDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, NWDO 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 of the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

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

- a. Emission Limitation:

The maximum annual sand usage shall not exceed 114,696 tons per rolling, 12-month period.

- Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by the record keeping requirements specified in d)(1).

b. Emission Limitations:

VOC emissions shall not exceed 0.08 lb/ton of sand and 4.59 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the lb/ton emission limitation shall be demonstrated based on the results of the emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the lb/ton of sand emission limitation by the annual sand restriction of 114,696 tons and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the lb/ton emission limitation and the annual sand throughput, compliance with the annual limitation shall be demonstrated.

c. Emission Limitations:

PE shall not exceed 0.04 lb/ton and 2.29 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

If required, compliance with the lb/ton emission limitation shall be demonstrated based on the results of the emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the lb/ton of sand emission limitation by the annual sand restriction of 114,696 tons and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the lb/ton emission limitation and the annual sand throughput, compliance with the annual limitation shall be demonstrated.

d. Emission Limitations:

PM<sub>10</sub> shall not exceed 0.08 lb/ton and 4.59 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

If required, compliance with the lb/ton emission limitation shall be demonstrated based on the results of the emission testing conducted in accordance with Methods 201/201A and 202, 40 CFR Part 51, Appendix M. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the lb/ton of sand emission limitation by the annual sand restriction of 114,696 tons and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the lb/ton emission

limitation and the annual sand throughput, compliance with the annual limitation shall be demonstrated.

e. Emission Limitation:

Visible PE from the baghouse stacks shall not exceed 10% opacity.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be demonstrated in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

(1) None.

**3. Emissions Unit Group - PSand CL Blast Cabinets: P479, P549, P510, P511,**

EU ID	Operations, Property and/or Equipment Description
P479	Precision Sand Mod #1 Cylinder Liner Blast Cabinet
P549	Precision Sand Mod #2 Cylinder Liner Blast Cabinet
P510	Precision Sand Mod #3 Cylinder Liner Blast Cabinet
P511	Precision Sand Mod #4 Cylinder Liner Blast Cabinet

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) b)(1)c. and b)(2)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<u>From each emissions unit individually:</u>  Particulate matter less than or equal to 10 microns in size (PM <sub>10</sub> ) shall not exceed 0.010 pound per ton of aluminum and 0.13 ton per year, based upon a rolling, 12-month summation of the monthly emissions.  Visible particulate emissions (PE) shall not exceed 10% opacity, as a six-minute average.  See b)(2)a., b)(2)d. and b)(2)e.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-17-07(A)(1) OAC rule 3745-17-11(B)	The emission limitations specified by these rule are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting the potential to emit (PTE) for PM<sub>10</sub>. The PTE is being restricted such that the emission increase for PM<sub>10</sub> allowed for in this permit action (P0106622) will be below the Prevention of Significant Deterioration (PSD) "significant threshold" applicability level of 15 tpy (for PM<sub>10</sub>). The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2), which require control equipment and process control:

i. PM<sub>10</sub> emissions shall not exceed 0.010 pound per ton of aluminum and 0.13 tpy, based upon a rolling, 12-month summation of the monthly emissions.

b. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

c. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the PM<sub>10</sub> emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(D).

d. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size (PM<sub>2.5</sub>) are being implemented through the PM<sub>10</sub> Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that PM<sub>10</sub> is a reasonable surrogate for PM<sub>2.5</sub>, all emissions of PM<sub>10</sub> will be considered PM<sub>2.5</sub>.

e. All PE is in the form of PM<sub>10</sub>.

c) Operational Restrictions

- (1) The permittee shall operate the baghouses at all times when these emissions units are in operation.
- (2) The maximum annual aluminum usage for each individual emissions unit shall not exceed 26,762 tons, based upon a rolling, 12-month summation of the monthly quantities of aluminum used.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the aluminum usage levels specified in the following table for these emissions units, individually:

Month(s)	Maximum Allowable Cumulative Aluminum Usage (tons)
1	2,680
1-2	5,360
1-3	8,040
1-4	10,720
1-5	13,400
1-6	16,080
1-7	18,760
1-8	21,440
1-9	24,120
1-10	25,013
1-11	25,907
1-12	26,762

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual aluminum usage restriction shall be based upon a rolling, 12-month summation of the monthly quantity of aluminum poured in emissions units F008, F009, F010, F011 and F012

d) Monitoring and/or Record keeping Requirements

- (1) The permittee shall collect and record the following information each month for these emissions units individually:
  - a. the amount of aluminum processed\*, in tons;
  - b. for the first 12 months of operation following the issuance of this permit, the cumulative quantity of aluminum processed, in tons; and
  - c. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly amount of aluminum processed.

\*The amount of aluminum processed through these emissions units are equivalent to the amount of aluminum poured in emissions units F008, F009,

F010, F011 and F012. The monitoring and record keeping associated with the aluminum processed in emissions units F008, F009, F010, F011 and F012 can be used to fulfill the requirements in this section.

- (2) The permittee shall perform weekly\* checks when these emissions units are in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving these emissions units. The presence or absence of any visible emissions, excluding water vapor, 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 date and time of the visible emission observation;
  - b. the identification of the stack observed;
  - c. the color of the emissions;
  - d. the total duration of any visible emission observation; and
  - e. the corrective actions, if any, taken to eliminate the visible emissions.

\*once during each normal calendar week

- (3) The permittee shall maintain records documenting any time periods when these emissions units were in operation and the baghouses were not operating.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following:
- a. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative aluminum usage restriction; and
  - b. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month aluminum usage restriction.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions, excluding water vapor, were observed from the stacks serving these emissions units and (b) describe the corrective actions, if any, taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (3) The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions units were in operation and the baghouses were not operating. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

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

a. Emission Limitation:

The amount of aluminum poured shall not exceed 26,762 tons per rolling, 12-month period for these emissions units, individually.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(1).

b. Emission Limitations:

PM<sub>10</sub> emission shall not exceed 0.010 lb/ton and 0.13 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

If required, compliance with the lb/ton emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the lb/ton of sand emission limitation by the annual aluminum restriction of 26,762 tons, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation shall be demonstrated.

c. Emission Limitation:

Visible PE from the baghouse stacks shall not exceed 10% opacity.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be demonstrated in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

(1) None.

**4. Emissions Unit Group - PSand Casting Cooling Tunnel: P474, P512, P513, P514,**

EU ID	Operations, Property and/or Equipment Description
P474	Precision Sand Mod #1 Casting Cooling Tunnel
P512	Precision Sand Mod #2 Casting Cooling Tunnel
P513	Precision Sand Mod #3 Casting Cooling Tunnel
P514	Precision Sand Mod #4 Casting Cooling Tunnel

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) b)(1)e. and b)(2)e.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-10 through 20	<p><u>From each emissions unit individually:</u></p> <p>Volatile organic compound (VOC) emissions shall not exceed 0.75 pound per ton (lb/ton) of aluminum and 10.04 tons per year(tpy), based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(D)	<p><u>From each emissions unit individually:</u></p> <p>Particulate emissions (PE) shall not exceed 0.09 lb/ton of aluminum and 1.20 tpy, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>Particulate matter emissions less than or equal to 10 microns in size (PM<sub>10</sub>) shall not exceed 0.17 lb/ton and 2.27 tpy, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>Visible PE shall not exceed 10% opacity, as a six-minute average.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)b. and b)(2)e.
c.	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D).
d.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)d.
e.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)e.

(2) Additional Terms and Conditions

- a. Based on the "Prevention of Significant Deterioration" (PSD) analysis conducted to ensure the application of "Best Available Control Technology" (BACT), it has been determined that no control technologies for VOC were cost effective.
- b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) for PE and PM<sub>10</sub>. The PTE is being restricted such that the emission increase for PE and PM<sub>10</sub> allowed for in this permit action (P0106622) will be below the Prevention of Significant Deterioration (PSD) "significant threshold" applicability level of 25 tpy (for PE) and 15 tpy (for PM<sub>10</sub>). The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2), which require control equipment and process control:
  - i. PM<sub>10</sub> emissions shall not exceed 0.17 lb/ton and 2.27 tpy, based upon a rolling, 12-month summation of the monthly emissions; and
  - ii. PE shall not exceed 0.09 lb/ton of aluminum and 1.20 tpy, based upon a rolling, 12-month summation of the monthly emissions.
- c. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the

December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- d. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the PE and PM<sub>10</sub> emissions from this air contaminant source since the controlled potential to emit (PTE) for PM<sub>10</sub> is less than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(D). BAT requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

- e. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size (PM<sub>2.5</sub>) are being implemented through the PM<sub>10</sub> Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that PM<sub>10</sub> is a reasonable surrogate for PM<sub>2.5</sub>, all emissions of PM<sub>10</sub> will be considered PM<sub>2.5</sub>.

c) **Operational Restrictions**

- (1) The maximum annual aluminum usage for this emissions unit shall not exceed 26,762 tons, based upon a rolling, 12-month summation of the monthly quantities of aluminum used.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the aluminum usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Aluminum Usage (tons)</u>
1	2,680
1-2	5,360
1-3	8,040
1-4	10,720
1-5	13,400
1-6	16,080
1-7	18,760
1-8	21,440
1-9	24,120

1-10	25,013
1-11	25,907
1-12	26,762

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual aluminum usage restriction shall be based upon a rolling, 12-month summation of the monthly quantity of aluminum poured in emissions units F008, F009, F010, F011 and F012.

- (2) The permittee shall operate the baghouses at all times when these emissions units are in operation.
- d) Monitoring and/or Record keeping Requirements
- (1) The permittee shall collect and record the following information each month for these emissions units, individually:
    - a. the amount of aluminum processed, in tons;
    - b. for the first 12 months of operation following the issuance of this permit, the cumulative quantity of aluminum processed, in tons; and
    - c. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly amount of aluminum processed.

\*The amount of aluminum processed through this emissions unit is equivalent to the amount of aluminum poured in emissions units F008, F009, F010, F011 and F012, . The monitoring and record keeping associated with the aluminum processed in emissions units F008, F009, F010, F011 and F012 can be used to fulfill the requirements in this section.
  - (2) The permittee shall perform weekly\* checks when these emissions units are in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions, excluding water vapor, 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 date and time of the visible emission observation;
    - b. the identification of the stack observed;
    - c. the color of the emissions;
    - d. the total duration of any visible emission observation; and
    - e. the corrective actions, if any, taken to eliminate the visible emissions.

\*once during each normal calendar week
  - (3) The permittee shall maintain records documenting any time periods when these emissions units were in operation and the baghouses were not operating.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following:
  - a. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative aluminum usage restriction; and
  - b. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month aluminum usage restriction.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions, excluding water vapor, were observed from the stacks serving these emissions units and (b) describe the corrective actions, if any, taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (3) The permittee shall submit deviation (excursion) reports that identify any time periods when these emissions units were in operation and the baghouses were not operating. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for all four (4) precision sand modules in accordance with the following requirements:
  - a. The emissions testing shall be conducted over four (4) consecutive years, beginning no later than 180 days after achieving the maximum production rate at which Psand module 1 (emissions units P474), Psand module 2 (emissions units P512), Psand module 3 (emissions units P513) or Psand module 4 (emissions units P514), will be operated, whichever comes first. The permittee shall test a minimum of one module per year.
  - b. The emission testing shall be conducted to demonstrate compliance with the following:
    - i. for VOC - 0.75 lb/ton of aluminum.
  - c. The following test methods shall be employed to demonstrate compliance with the above emission limitations:
    - i. For total VOC, Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 18, 25, or 25A (as applicable) of 40 CFR Part 60, Appendix A for determining total VOC mass emissions.

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

- d. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- e. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, NWDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, NWDO 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 of the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

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

- a. Emission Limitation:

The maximum annual aluminum usage shall not exceed 26,762 tons per rolling, 12-month period.

- Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by the record keeping requirements specified in d)(1).

b. Emission Limitations:

VOC emissions shall not exceed 0.75 lb/ton of aluminum and 10.04 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the lb/ton emission limitation shall be demonstrated based on the results of the emission testing conducted in accordance with Methods 1-4, 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the lb/ton of aluminum emission limitation by the annual aluminum restriction of 26,762 tons and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation shall be demonstrated.

c. Emission Limitations:

PE shall not exceed 0.09 lb/ton and 1.20 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

If required, compliance with the lb/ton emission limitation shall be demonstrated based on the results of the emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the lb/ton of aluminum emission limitation by the annual aluminum restriction of 26,762 tons, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation shall be demonstrated.

d. Emission Limitations:

PM<sub>10</sub> shall not exceed 0.17 lb/ton and 2.27 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

If required, compliance with the lb/ton emission limitation shall be demonstrated based on the results of the emission testing conducted in accordance with Methods 201/201A and 202, 40 CFR Part 51, Appendix M. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the lb/ton of aluminum emission limitation by the annual aluminum restriction of 26,762 tons, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with

the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation shall be demonstrated.

e. Emission Limitation:

Visible PE from the baghouse stacks shall not exceed 10% opacity.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be demonstrated in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

(1) None.

**5. Emissions Unit Group - PSand Final Shot Blast: P476, P515, P516, P517,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P476	Precision Sand Mod #1 Final Shot Blast Cabinet
P515	Precision Sand Mod #2 Final Shot Blast Cabinet
P516	Precision Sand Mod #3 Final Shot Blast Cabinet
P517	Precision Sand Mod #4 Final Shot Blast Cabinet

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) b)(1)c. and b)(2)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	<u>From each emissions unit individually:</u>  Particulate matter less than or equal to 10 microns in size (PM <sub>10</sub> ) shall not exceed 0.020 pound per ton of aluminum and 0.27 ton per year, based upon a rolling, 12-month summation of the monthly emissions.  Visible particulate emissions (PE) shall not exceed 10% opacity, as a six-minute average.  See b)(2)a., b)(2)d. and b)(2)e.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-17-07(A)(1) OAC rule 3745-17-11(B)	The emission limitations specified by these rule are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) for PM<sub>10</sub>. The PTE is being restricted such that the emission increase for PM<sub>10</sub> allowed for in this permit action (P0106622) will be below the Prevention of Significant Deterioration (PSD) "significant threshold" applicability level of 15 tpy (for PM<sub>10</sub>). The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2), which require control equipment and process control:

i. PM<sub>10</sub> shall not exceed 0.020 pound per ton of aluminum and 0.27 ton per year, based upon a rolling, 12-month summation of the monthly emissions.

b. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

c. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the PM<sub>10</sub> emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(D).

d. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size (PM<sub>2.5</sub>) are being implemented through the PM<sub>10</sub> Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that PM<sub>10</sub> is a reasonable surrogate for PM<sub>2.5</sub>, all emissions of PM<sub>10</sub> will be considered PM<sub>2.5</sub>.

e. All PE is in the form of PM<sub>10</sub>.

c) Operational Restrictions

- (1) The permittee shall operate the baghouses at all times when these emissions units are in operation.
- (2) The maximum annual aluminum usage for these emissions units individually shall not exceed 26,762 tons, based upon a rolling, 12-month summation of the monthly quantities of aluminum used.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the aluminum usage levels specified in the following table for these emissions units, individually:

Month(s)	Maximum Allowable Cumulative Aluminum Usage (tons)
1	2,680
1-2	5,360
1-3	8,040
1-4	10,720
1-5	13,400
1-6	16,080
1-7	18,760
1-8	21,440
1-9	24,120
1-10	25,013
1-11	25,907
1-12	26,762

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual aluminum usage restriction shall be based upon a rolling, 12-month summation of the monthly quantity of aluminum poured in emissions units F008, F009, F010, F011 and F012.

d) Monitoring and/or Record keeping Requirements

- (1) The permittee shall collect and record the following information each month for these emissions units individually:
  - a. the amount of aluminum processed\*, in tons;
  - b. for the first 12 months of operation following the issuance of this permit, the cumulative quantity of aluminum processed, in tons; and
  - c. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly amount of aluminum processed.

\*The amount of aluminum processed through these emissions units are equivalent to the amount of aluminum poured in emissions units F008, F009, F010, F011 and F012. The monitoring and record keeping associated with the

aluminum processed in emissions units F008, F009, F010, F011 and F012 can be used to fulfill the requirements in this section.

- (2) The permittee shall perform weekly\* checks when these emissions units are in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions, excluding water vapor, 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 date and time of the visible emission observation;
  - b. the identification of the stack observed;
  - c. the color of the emissions;
  - d. the total duration of any visible emission observation; and
  - e. the corrective actions, if any, taken to eliminate the visible emissions.

\*once during each normal calendar week

- (3) The permittee shall maintain records documenting any time periods when these emissions units were in operation and the baghouses were not operating.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following:
- a. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative aluminum usage restriction; and
  - b. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month aluminum usage restriction.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions, excluding water vapor, were observed from the stacks serving these emissions units and (b) describe the corrective actions, if any, taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (3) The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions units were in operation and the baghouses were not operating. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

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

a. Emission Limitation:

The amount of aluminum poured shall not exceed 26,762 tons per rolling, 12-month period for these emissions units, individually.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(1).

b. Emission Limitations:

PM<sub>10</sub> emission shall not exceed 0.020 lb/ton and 0.27 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

If required, compliance with the lb/ton emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the lb/ton of aluminum emission limitation by the annual aluminum restriction of 26,762 tons, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation shall be demonstrated.

c. Emission Limitation:

Visible PE from the baghouse stacks shall not exceed 10% opacity.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be demonstrated in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

(1) None.

**6. Emissions Unit Group - PSand Finishing: P475, P541, P542, P543,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P475	Precision Sand Mod #1 DeFlash, DeCore, DeGate Operations
P541	Precision Sand Mod #2 DeFlash, DeCore, DeGate Operations
P542	Precision Sand Mod #3 DeFlash, DeCore, DeGate Operations
P543	Precision Sand Mod #4 DeFlash, DeCore, DeGate Operations

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) b)(1)e and b)(2)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-10 through 20	<u>From each emissions unit individually:</u> Volatile organic compound (VOC) emissions shall not exceed 0.377 pound per ton (lb/ton) of aluminum and 5.04 tons per year(tpy), based upon a rolling, 12-month summation of the monthly emissions.  See b)(2)a.
b.	OAC rule 3745-31-05(D)	<u>From each emissions unit individually:</u>  Particulate matter emissions less than or equal to 10 microns in size (PM <sub>10</sub> ) shall not exceed 0.031 lb/ton and 0.41 tpy, based upon a rolling, 12-month summation of the monthly emissions.  Visible PE shall not exceed 10% opacity, as a six-minute average.  See b)(2)b., b)(2)e., and b)(2)f.
c.	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		to OAC rule 3745-31-05(D).
d.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c.
e.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.

(2) Additional Terms and Conditions

- a. Based on the "Prevention of Significant Deterioration" (PSD) analysis conducted to ensure the application of "Best Available Control Technology" (BACT), it has been determined that no control technologies for VOC were cost effective.
- b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) for PM<sub>10</sub>. The PTE is being restricted such that the emission increase for PM<sub>10</sub> allowed for in this permit action (P0106622) will be below the Prevention of Significant Deterioration (PSD) "significant threshold" applicability level of 15 tpy (for PM<sub>10</sub>). The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2), which require control equipment and process control:
  - i. PM<sub>10</sub> emissions shall not exceed 0.031 lb/ton and 0.41 tpy, based upon a rolling, 12-month summation of the monthly emissions
- c. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- d. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the VOC and PM<sub>10</sub> emissions from this air contaminant source since the controlled potential to emit (PTE) is each less than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(D).

- e. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size (PM<sub>2.5</sub>) are being implemented through the PM<sub>10</sub> Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that PM<sub>10</sub> is a reasonable surrogate for PM<sub>2.5</sub>, all emissions of PM<sub>10</sub> will be considered PM<sub>2.5</sub>.
- f. All PE is in the form of PM<sub>10</sub>.

c) Operational Restrictions

- (1) The maximum annual aluminum usage for this emissions unit shall not exceed 26,762 tons, based upon a rolling, 12-month summation of the monthly quantities of aluminum used.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the aluminum usage levels specified in the following table:

Month(s)	<u>Maximum Allowable Cumulative Aluminum Usage (tons)</u>
1	2,680
1-2	5,360
1-3	8,040
1-4	10,720
1-5	13,400
1-6	16,080
1-7	18,760
1-8	21,440
1-9	24,120
1-10	25,013
1-11	25,907
1-12	26,762

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual aluminum usage restriction shall be based upon a rolling, 12-month summation of the monthly quantity of aluminum poured in emissions units F008, F009, F010, F011 and F012.

- (2) The permittee shall operate the baghouses at all times when these emissions units are in operation.

d) Monitoring and/or Record keeping Requirements

- (1) The permittee shall collect and record the following information each month for these emissions units, individually:
  - a. the amount of aluminum processed, in tons;
  - b. for the first 12 months of operation following the issuance of this permit, the cumulative quantity of aluminum processed, in tons; and
  - c. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly amount of aluminum processed.

\*The amount of aluminum processed through this emissions unit is equivalent to the amount of aluminum poured in emissions units F008, F009, F010, F011 and F012, . The monitoring and record keeping associated with the aluminum processed in emissions units F008, F009, F010, F011 and F012 can be used to fulfill the requirements in this section.

- (2) The permittee shall perform weekly\* checks when these emissions units are in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving these emissions units. The presence or absence of any visible emissions, excluding water vapor, 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 date and time of the visible emission observation;
  - b. the identification of the stack observed;
  - c. the color of the emissions;
  - d. the total duration of any visible emission observation; and
  - e. the corrective actions, if any, taken to eliminate the visible emissions.

\*once during each normal calendar week

- (3) The permittee shall maintain records documenting any time periods when these emissions unit were in operation and the baghouses were not operating.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following:
  - a. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative aluminum usage restriction; and
  - b. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month aluminum usage restriction.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions, excluding water vapor, were observed from the stacks serving these emissions units and (b) describe the corrective actions, if any, taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (3) The permittee shall submit deviation (excursion) reports that identify any time periods when these emissions units were in operation and the baghouses were not operating. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for all four (4) precision sand modules in accordance with the following requirements:
  - a. The emissions testing shall be conducted over four (4) consecutive years, beginning no later than 180 days after achieving the maximum production rate at which Psand module1 (emissions units P475), Psand module 2 (emissions units P541), Psand module 3 (emissions units P542) or Psand module 4 (emissions units P543), will be operated, whichever comes first. The permittee shall test a minimum of one module per year.
  - b. The emission testing shall be conducted to demonstrate compliance with the following:
    - i. for VOC - 0.377 lb/ton of aluminum.
  - c. The following test methods shall be employed to demonstrate compliance with the above emission limitations:
    - i. For total VOC, Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 18, 25, or 25A (as applicable) of 40 CFR Part 60, Appendix A for determining total VOC mass emissions.

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

- d. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- e. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable

emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, NWDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, NWDO 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 of the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

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

a. Emission Limitation:

The maximum annual aluminum usage shall not exceed 26,762 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by the record keeping requirements specified in d)(1).

b. Emission Limitations:

VOC emissions shall not exceed 0.377 lb/ton of aluminum and 5.04 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the lb/ton emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4, 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the lb/ton of aluminum emission limitation by the annual aluminum restriction of 26,762 tons, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation shall be demonstrated.

c. Emission Limitations:

PM<sub>10</sub> shall not exceed 0.031 lb/ton and 0.41 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

If required, compliance with the lb/ton emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 201/201A and 202, 40 CFR Part 51, Appendix M. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the lb/ton of aluminum emission limitation by the annual aluminum restriction of 26,762 tons, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation shall be demonstrated.

d. Emission Limitation:

Visible PE from the baghouse stacks shall not exceed 10% opacity.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be demonstrated in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

- (1) None.

**7. Emissions Unit Group - PSand Mod#1 Core Machines: P464, P465, P466, P467, P468, P469,**

EU ID	Operations, Property and/or Equipment Description
P464	Precision Sand Mod #1 Core Machine #1
P465	Precision Sand Mod #1 Core Machine #2
P466	Precision Sand Mod #1 Core Machine #3
P467	Precision Sand Mod #1 Core Machine #4
P468	Precision Sand Mod #1 Core Machine #5
P469	Precision Sand Mod #1 Core Machine #6

- 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) b)(1)f., b)(2)e. and b)(1)g.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-10 through 20	<p>Volatile organic compound emissions (VOC) from emissions units P464, P465, P466, P467, P468 and P469, combined, shall not exceed 51.61 tons per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.</p> <p><u>Receiving hopper and sand mixer (Stacks PSand3-1 and PSand4-1)</u>            VOC emissions shall not exceed 0.10 pound per ton of sand processed.</p> <p><u>Core making (Stack PSandScr1)</u>            VOC emissions shall not exceed 0.60 pound per ton of sand processed.</p> <p><u>Maintenance (metal cleaning of core machine - Stack PSandScr1):</u>            VOC emissions shall not exceed 0.20 pound per ton of sand processed.</p> <p>Fugitive VOC emissions shall not exceed 2.0 tpy, based on a rolling, 12-month summation of the monthly emissions.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Sulfur dioxide (SO<sub>2</sub>) emissions from emissions units P464, P465, P466, P467, P468 and P469, combined, shall not exceed 9.18 tpy, based upon a rolling, 12-month summation of the monthly emissions.</p> <p><u>Core making (Stack PSandScr1)</u></p> <p>SO<sub>2</sub> emissions shall not exceed 0.16 pound per ton of sand processed.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(D)	<p>Particulate matter less than or equal to 10 microns in size (PM<sub>10</sub>) from emissions units P464, P465, P466, P467, P468 and P469, combined, shall not exceed 2.67 tons per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.</p> <p><u>Receiving hopper and sand mixer (Stacks PSand3-1 and PSand4-1)</u></p> <p>PM<sub>10</sub> shall not exceed 0.0182 lb/ton of sand processed.</p> <p><u>Core making (Stack PSandScr1)</u></p> <p>PM<sub>10</sub> shall not exceed 0.028 lb/ton of sand processed.</p> <p>Visible PE from the stacks serving this emissions unit shall not exceed 10% opacity, as a six-minute average.</p> <p>See b)(2)b, b)(2)c and b)(2)g.</p>
c.	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B) OAC rule 3745-18-06(E)	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D).
d.	OAC rule 3745-21-07(G)	Exempt, pursuant to OAC rule 3745-21-07(G)(9)(i). See b)(2)f.
e.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)d.
f.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
9.	OAC rule 3745-114-01 ORC 3704.03(F)	See B.2 – Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control technology (BACT) on this emissions unit for VOC and SO<sub>2</sub>. BACT has been determined to be the use of the following:
  - i. sand mixing - no control technologies were cost effective.
  - ii. core making - a packed tower wet scrubber. The wet scrubber shall achieve the following control efficiencies:
    - (a) dimethyl isopropyl amine (DMIPA) as catalyst: 99% for the DMIPA; and
    - (b) SO<sub>2</sub> as catalyst: 99.0% for SO<sub>2</sub>.
- b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting the potential to emit (PTE) for PM<sub>10</sub>. The PTE is being restricted such that the emission increase for PM<sub>10</sub> allowed for in this permit action (P0106622) will be below the Prevention of Significant Deterioration (PSD) “significant threshold” applicability level of 15 tpy (for PM<sub>10</sub>). The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2), which require control equipment and process control:
  - i. PM<sub>10</sub> emissions shall not exceed:
    - (a) 0.0182 lb/ton of sand (receiving hopper and sand mixer),
    - (b) 0.028 lb/ton of sand (core making); and
    - (c) 2.67 tpy, based upon a rolling, 12-month summation of the monthly emissions.
- c. All emissions of particulate matter are PM<sub>10</sub>.
- d. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has

not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- e. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of VOC and SO<sub>2</sub> from this air contaminant source since the potential to emit for each is each less than ten tons per year, taking into account the federally enforceable restriction on the amount of sand processed and the use of a wet scrubber.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of PM<sub>10</sub> from this air contaminant source since the potential to emit is less than ten tons per year, taking into account the federally enforceable restriction on the amount of sand processed, the use of a baghouse and cyclone.

- f. On February 18, 2008, Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirements of OAC rule 3745-21-07(G)(2) still exists as part of the federally-approved SIP of Ohio.

- g. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size (PM<sub>2.5</sub>) are being implemented through the PM<sub>10</sub> Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that PM<sub>10</sub> is a reasonable surrogate for PM<sub>2.5</sub>, all emissions of PM<sub>10</sub> will be considered PM<sub>2.5</sub>.

c) **Operational Restrictions**

- (1) The maximum annual sand processed in emission units P464 through P469, combined, shall not exceed 114,696 tons, based upon a rolling, 12-month summation of sand processed.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the sand processing levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Sand Usage (tons)</u>
1	10,000
1-2	20,000
1-3	30,000
1-4	40,000
1-5	50,000
1-6	60,000
1-7	70,000
1-8	80,000
1-9	90,000
1-10	100,000
1-11	110,000
1-12	114,696

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual sand restriction shall be, based upon a rolling, 12-month summation of the monthly sand processed.

- (2) The permittee shall operate the baghouse at all times when this emissions unit is in operation.

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

- (1) The permittee shall collect and record the following information each month for emissions units P464, through P469, combined:
  - a. the quantity of sand processed, in tons;
  - b. for the first 12 months of operation following the issuance of this permit, the cumulative quantity of sand processed, in tons; and
  - c. after the first 12 months of operation, the quantity of sand processed, in tons, based on a rolling, 12-month summation of the monthly sand processed.

\*The amount of sand processed through this emissions unit is equivalent to the amount of sand received in emissions units P906, P907, P908 and P909, . The monitoring and record keeping associated with the sand received in emissions unit P906 can be used to fulfill the requirements in this section.

- (2) The permittee shall properly operate and maintain equipment to continuously monitor the liquor pH and the scrubber liquor flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. the catalyst gas scrubber liquor pH, on a once-per-shift basis;

- b. the catalyst gas scrubber liquor flow rate, in gallons per minute, on a once-per-shift basis; and
- c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

Whenever the monitored values for the catalyst gas scrubber liquor pH and catalyst gas scrubber liquor flow rate deviate from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable ranges 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 catalyst gas scrubber liquor pH and catalyst gas scrubber liquor flow rate 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.

- d. The catalyst gas scrubber, utilizing the DMIPA, catalyst, recirculating liquor pH shall be continuously maintained at a value of less than or equal to 5 at all times while the emissions unit is in operation, or as established during the most recent performance test that demonstrated the emissions unit was in compliance. The caustic catalyst gas scrubber, utilizing the SO<sub>2</sub> catalyst, recirculating liquor pH shall be continuously maintained at a value of greater than or equal to 9 at all times while the emissions unit is in operation, or as established during the most recent performance test that demonstrated the emissions unit was in compliance.
- e. The catalyst gas scrubber liquor flow rate shall be continuously maintained at a value of not less than 3 gallons per minute per 1,000 cfm of gas flow at all times while the emissions unit is in operation, or as established during the most recent performance test that demonstrated the emissions unit was in compliance.

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

- (3) The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the baghouse was not operating.
- (4) The permittee shall perform weekly\* checks when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse and from the cyclone serving this emissions unit. The presence or absence of any visible emissions, excluding water vapor, 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 date and time of the visible emission observation;
  - b. the identification of the stack observed;
  - c. the color of the emissions;
  - d. the total duration of any visible emission observation; and
  - e. the corrective actions, if any, taken to eliminate the visible emissions.

\*once during each normal calendar week

- (5) The permittee shall collect and record the following information on a monthly basis for the metal cleaner applied in this emissions unit:
  - a. the name and identification of each metal cleaner employed;
  - b. the VOC content of each metal cleaner, in pounds per gallon;
  - c. the number of gallons of each metal cleaner employed;
  - d. the total VOC emission rate from all metal cleaners, i.e., the summation of the products of "d)(5)b." times "d)(5)c." for all metal cleaners employed, in pounds; and
  - e. the pound per ton of VOC emissions from all metal cleaners employed [d)(5)d./d)(1)a].

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following:
  - a. for the first 12 calendar months of operation following the issuance of this permit, the restriction on the maximum allowable cumulative quantity of sand processed; and
  - b. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month restriction on the quantity of sand processed.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit deviation (excursion) reports that identify the following:
- a. any time periods when the emissions unit was in operation and the baghouse(s) was not operating;
  - b. any exceedance of the 0.20 lb VOC/ton of sand emission limitation for the metal cleaner.

Each report shall be submitted within 30 days after the deviation occurs.

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the wet scrubber during the operation of the emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the liquid flow rate or the liquid pH was outside of the appropriate range or limit specified by the manufacturer and outside of the acceptable range for each parameter following any required compliance demonstration;
  - b. an identification of each incident of deviation described in (3)a. where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (3)a. where prompt corrective action, that would bring the liquid flow rate or scrubber liquid pH into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (3)a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

- (4) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions, excluding water vapor, were observed from the baghouse and from the cyclone serving this emissions unit and (b) describe the corrective actions, if any, taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) **Testing Requirements**

- (1) The permittee shall conduct, or have conducted, emission testing for all four (4) precision sand modules in accordance with the following requirements:
- a. The emissions testing shall be conducted over four (4) consecutive years, beginning no later than 180 days after achieving the maximum production rate at which P<sub>sand</sub> module1 (emissions units P464, P465, P466, P467, P468,

P469) or Psand module 2 (emissions units P524, P527, P530, P533, P538) or Psand module 3 (emissions units P525, P528, P531, P534, P536, P539) or Psand module 4 (emissions units P526, P529, P532, P535, P537, P540), will be operated, whichever comes first. The permittee shall test a minimum of one module per year.

- b. The emission testing shall be conducted to demonstrate compliance with the following emission limitations involving DMIPA as the catalyst:
  - i. 0.60 lb of VOC per ton of sand, for core making.
- c. When the emission unit first utilizes SO<sub>2</sub> as the catalyst for purposes other than research and development, the permittee shall conduct testing within 60 days after the initial use of SO<sub>2</sub> to demonstrate compliance with the following emission limitations when utilizing SO<sub>2</sub> as the catalyst:
  - i. 0.16 lb of SO<sub>2</sub> per ton of sand, for core making; and
  - ii. The control efficiency for SO<sub>2</sub>.
- d. The following test methods shall be employed to demonstrate compliance with the above emission limitations:
  - i. for total VOC, Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 18, 25, or 25A (as applicable) of 40 CFR Part 60, Appendix A for determining total VOC mass emissions.
  - ii. for SO<sub>2</sub>, Methods 1-4 and 6 of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 6 of 40 CFR Part 60, Appendix A for determining SO<sub>2</sub> mass emissions.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO. The test method(s) which must be employed to demonstrate compliance with the control efficiencies are specified below.

- e. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- f. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to

test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

- g. During emission testing, the permittee shall also record the following information:
  - i. the pH range for the scrubbing liquid;
  - ii. the scrubber water flow rate, in gallons/minute; and
  - iii. the catalyst and resin used to make the cores.
- h. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, NWDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, NWDO 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 of the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

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

- a. Emission Limitation:

The maximum annual amount of sand processed for P464, P465, P466, P467, P468 and P469, combined, shall not exceed 114,696 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(1).

- b. Emission Limitations:

0.60 lb of VOC per ton of sand (core making)

Applicable Compliance Method:

Compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

c. Emission Limitations:

0.10 lb of VOC per ton of sand (hopper and mixing)

Applicable Compliance Method:

The lb/ton emission limitation was established based on the Casting Emission Reduction Program (CERP) report #1409-123-EQ (Technikon), published 12/09/02, revised 5/06.

If required, compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

d. Emission Limitation:

0.20 lb of VOC per ton of sand (metal cleaning).

Applicable Compliance Method:

The lb/ton emission limitation was established based on the use of five 55 gallon drums of metal cleaner per month with a VOC content of 8.1 lbs per gallon with 85% captured by the scrubber [scrubber does not provide control during metal cleaning] and the use of 114,696 tons per year of sand. Compliance shall be demonstrated based on the record keeping requirements specified in d)(5).

If required, compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

e. Emission Limitations:

PM<sub>10</sub> emissions shall not exceed 0.0182 lb/ton of sand (hopper and mixing)

PM<sub>10</sub> emissions shall not exceed 0.028 lb/ton of sand (core making)

Applicable Compliance Method:

If required, compliance with the company-established emission factors shall be demonstrated based on the results of emission testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M or as amended. Alternative or equivalent methods can be used with the approval of the director.

f. Emission Limitation:

VOC emissions from emission units P464, P465, P466, P467, P468 and P469, combined, shall not exceed 51.61 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation was established by adding the VOC emissions from the hopper and mixing, core making, and metal cleaning. VOC emissions from the hopper and mixing, core making, and metal cleaning were established by multiplying the respective VOC emission limitations of 0.10 lb/ton, 0.60 lb/ton, and 0.20 lb/ton by the annual sand throughput restriction of 114,696 tons per rolling, 12-month period, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/ton emission limitations and the annual sand throughput, compliance with the annual limitation shall also be demonstrated.

g. Emission Limitation:

Fugitive VOC emissions shall not exceed 2.0 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The emission limitation was established by multiplying the company-supplied emission factor of 0.035 lb of VOC per ton of sand by the annual sand restriction of 114,696 tons, and then dividing by 2000 lbs/ton.

h. Emission Limitation:

PM<sub>10</sub> emissions P464, P465, P466, P467, P468 and P469, combined, shall not exceed 2.67 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation was established by adding the PM<sub>10</sub> emissions from the hopper/mixing, and core making. PM<sub>10</sub> emissions from the hopper/mixing, and core making were established by multiplying the respective PM<sub>10</sub> emission limitations of 0.0182 lb/ton and 0.028 lb/ton by the annual sand throughput restriction of 114,696 tons per rolling, 12-month period, and then dividing by 2000 lbs/ton. Therefore, as long as compliance with the annual sand throughput restriction is demonstrated by the record keeping requirements specified in d)(1), compliance with the annual limitation shall also be demonstrated.

i. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 9.18 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the lb/ton of sand emission limitation by the annual sand restriction of 114,696 tons, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/ton emission limitation and the annual sand throughput, compliance with the annual limitation shall be demonstrated.

j. Emission Limitation:

SO<sub>2</sub> shall not exceed 0.16 lb/ton of sand (core making)

Applicable Compliance Method:

Compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

k. Emission Limitation:

Visible PE from the stack(s) serving this emissions unit shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources" or as amended. Alternative or equivalent methods can be used with the approval of the director

g) Miscellaneous Requirements

(1) None.

**8. Emissions Unit Group - PSand Mod#3 Core Machines: P525, P528, P531, P534, P536, P539,**

EU ID	Operations, Property and/or Equipment Description
P525	Precision Sand Mod #3 Core Machine #1
P528	Precision Sand Mod #3 Core Machine #2
P531	Precision Sand Mod #3 Core Machine #3
P534	Precision Sand Mod #3 Core Machine #4
P536	Precision Sand Mod #3 Core Machine #6
P539	Precision Sand Mod #3 Core Machine #5

- 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) b)(1)f., b)(2)e. and b)(1)g.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-10 through 20	<p>Volatile organic compound emissions (VOC) from emissions units P525, P528, P531, P534, P536 and P539, combined, shall not exceed 51.61 tons per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.</p> <p><u>Receiving hopper and sand mixer (Stacks PSand3-3 and PSand4-3)</u>            VOC emissions shall not exceed 0.10 pound per ton of sand processed.</p> <p><u>Core making (Stack PSandScr3)</u>            VOC emissions shall not exceed 0.60 pound per ton of sand processed.</p> <p><u>Maintenance (metal cleaning of core machine - Stack PSandScr3):</u>            VOC emissions shall not exceed 0.20 pound per ton of sand processed.</p> <p>Fugitive VOC emissions shall not exceed 2.0 tpy, based on a rolling, 12-month summation of the monthly emissions.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Sulfur dioxide (SO<sub>2</sub>) emissions from emissions unit P525, P528, P531, P534, P536 and P539, combined, shall not exceed 9.18 tpy, based upon a rolling, 12-month summation of the monthly emissions.</p> <p><u>Core making (Stack PSandScr3)</u></p> <p>SO<sub>2</sub> emissions shall not exceed 0.16 pound per ton of sand processed.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(D)	<p>Particulate matter less than or equal to 10 microns in size (PM<sub>10</sub>) from emission units P525, P528, P531, P534, P536 and P539, combined, shall not exceed 2.67 tons per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.</p> <p><u>Receiving hopper and sand mixer (Stacks PSand3-3 and PSand4-3)</u></p> <p>PM<sub>10</sub> shall not exceed 0.0182 lb/ton of sand processed.</p> <p><u>Core making (Stack PSandScr3)</u></p> <p>PM<sub>10</sub> shall not exceed 0.028 lb/ton of sand processed.</p> <p>Visible PE from the stacks serving this emissions unit shall not exceed 10% opacity, as a six-minute average.</p> <p>See b)(2)b, b)(2)c and b)(2)g.</p>
c.	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B) OAC rule 3745-18-06(E)	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D).
d.	OAC rule 3745-21-07(G)	Exempt, pursuant to OAC rule 3745-21-07(G)(9)(i). See b)(2)f.
e.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)d.
f.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
9.	OAC rule 3745-114-01 ORC 3704.03(F)	See B.2 – Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control technology (BACT) on this emissions unit for VOC and SO<sub>2</sub>. BACT has been determined to be the use of the following:
  - i. sand mixing - no control technologies were cost effective.
  - ii. core making - a packed tower wet scrubber. The wet scrubber shall achieve the following control efficiencies:
    - (a) dimethyl isopropyl amine (DMIPA) as catalyst: 99% for the DMIPA; and
    - (b) SO<sub>2</sub> as catalyst: 99.0% for SO<sub>2</sub>.
- b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) for PM<sub>10</sub>. The PTE is being restricted such that the emission increase for PM<sub>10</sub> allowed for in this permit action (P0106622) will be below the Prevention of Significant Deterioration (PSD) "significant threshold" applicability level of 15 tpy (for PM<sub>10</sub>). The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2), which require control equipment and process control:
  - i. PM<sub>10</sub> emissions shall not exceed:
    - (a) 0.0182 lb/ton of sand (receiving hopper and sand mixer),
    - (b) 0.028 lb/ton of sand (core making); and
    - (c) 2.67 tpy, based upon a rolling, 12-month summation of the monthly emissions.
- c. All emissions of particulate matter are PM<sub>10</sub>.
- d. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has

not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- e. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of VOC and SO<sub>2</sub> from this air contaminant source since the potential to emit for each is less than ten tons per year, taking into account the federally enforceable restriction on the amount of sand processed and the use of a wet scrubber.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of PM<sub>10</sub> from this air contaminant source since the potential to emit is less than ten tons per year, taking into account the federally enforceable restriction on the amount of sand processed, the use of a baghouse and cyclone.

- f. On February 18, 2008, Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirements of OAC rule 3745-21-07(G)(2) still exists as part of the federally-approved SIP of Ohio.

- g. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size (PM<sub>2.5</sub>) are being implemented through the PM<sub>10</sub> Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that PM<sub>10</sub> is a reasonable surrogate for PM<sub>2.5</sub>, all emissions of PM<sub>10</sub> will be considered PM<sub>2.5</sub>.

c) **Operational Restrictions**

- (1) The maximum annual sand processed in emission units P525, P528, P531, P534, P536 and P539, combined, shall not exceed 114,696 tons, based upon a rolling, 12-month summation of sand processed.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the sand processing levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Sand Usage (tons)</u>
1	10,000
1-2	20,000
1-3	30,000
1-4	40,000
1-5	50,000
1-6	60,000
1-7	70,000
1-8	80,000
1-9	90,000
1-10	100,000
1-11	110,000
1-12	114,696

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual sand restriction shall be, based upon a rolling, 12-month summation of the monthly sand processed.

- (2) The permittee shall operate the baghouse at all times when this emissions unit is in operation.

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

- (1) The permittee shall collect and record the following information each month for emissions units P525, P528, P531, P534, P536 and P539, combined:
  - a. the quantity of sand processed, in tons;
  - b. for the first 12 months of operation following the issuance of this permit, the cumulative quantity of sand processed, in tons; and
  - c. after the first 12 months of operation, the quantity of sand processed, in tons, based on a rolling, 12-month summation of the monthly sand processed.

\*The amount of sand processed through this emissions unit is equivalent to the amount of sand received in emissions units P906, P907, P908 and P909, . The monitoring and record keeping associated with the sand received in emissions unit P906 can be used to fulfill the requirements in this section.

- (2) The permittee shall properly operate and maintain equipment to continuously monitor the liquor pH and the scrubber liquor flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. the catalyst gas scrubber liquor pH, on a once-per-shift basis;

- b. the catalyst gas scrubber liquor flow rate, in gallons per minute, on a once-per-shift basis; and
- c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

Whenever the monitored values for the catalyst gas scrubber liquor pH and catalyst gas scrubber liquor flow rate deviate from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable ranges 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 catalyst gas scrubber liquor pH and catalyst gas scrubber liquor flow rate 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.

- d. The catalyst gas scrubber, utilizing the DMIPA, catalyst, recirculating liquor pH shall be continuously maintained at a value of less than or equal to 5 at all times while the emissions unit is in operation, or as established during the most recent performance test that demonstrated the emissions unit was in compliance. The caustic catalyst gas scrubber, utilizing the SO<sub>2</sub> catalyst, recirculating liquor pH shall be continuously maintained at a value of greater than or equal to 9 at all times while the emissions unit is in operation, or as established during the most recent performance test that demonstrated the emissions unit was in compliance.
- e. The catalyst gas scrubber liquor flow rate shall be continuously maintained at a value of not less than 3 gallons per minute per 1,000 cfm of gas flow at all times while the emissions unit is in operation, or as established during the most recent performance test that demonstrated the emissions unit was in compliance.

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

- (3) The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the baghouse was not operating.
- (4) The permittee shall perform weekly\* checks when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse and from the cyclone serving this emissions unit. The presence or absence of any visible emissions, excluding water vapor, 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 date and time of the visible emission observation;
  - b. the identification of the stack observed;
  - c. the color of the emissions;
  - d. the total duration of any visible emission observation; and
  - e. the corrective actions, if any, taken to eliminate the visible emissions.

\*once during each normal calendar week

- (5) The permittee shall collect and record the following information on a monthly basis for the metal cleaner applied in this emissions unit:
  - a. the name and identification of each metal cleaner employed;
  - b. the VOC content of each metal cleaner, in pounds per gallon;
  - c. the number of gallons of each metal cleaner employed;
  - d. the total VOC emission rate from all metal cleaners, i.e., the summation of the products of "d)(5)b." times "d)(5)c." for all metal cleaners employed, in pounds; and
  - e. the pound per ton of VOC emissions from all metal cleaners employed [d)(5)d./d)(1)a].

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following:
  - a. for the first 12 calendar months of operation following the issuance of this permit, the restriction on the maximum allowable cumulative quantity of sand processed; and
  - b. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month restriction on the quantity of sand processed.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit deviation (excursion) reports that identify the following:
- a. any time periods when the emissions unit was in operation and the baghouse(s) was not operating; and
  - b. any exceedance of the 0.20 lb VOC/ton of sand emission limitation for the metal cleaner.

Each report shall be submitted within 30 days after the deviation occurs.

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the wet scrubber during the operation of the emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the liquid flow rate or the liquid pH was outside of the appropriate range or limit specified by the manufacturer and outside of the acceptable range for each parameter following any required compliance demonstration;
  - b. an identification of each incident of deviation described in (3)a. where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (3)a. where prompt corrective action, that would bring the liquid flow rate or scrubber liquid pH into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (3)a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

- (4) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions, excluding water vapor, were observed from the baghouse and from the cyclone serving this emissions unit and (b) describe the corrective actions, if any, taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (5) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for all four (4) precision sand modules in accordance with the following requirements:
  - a. The emissions testing shall be conducted over four (4) consecutive years, beginning no later than 180 days after achieving the maximum production rate at which Psand module 1 (emissions units P464, P465, P466, P467, P468, P469) or Psand module 2 (emissions units P524, P527, P530, P533, P538) or Psand module 3 (emissions units P525, P528, P531, P534, P536, P539) or Psand module 4 (emissions units P526, P529, P532, P535, P537, P540), will be operated, whichever comes first. The permittee shall test a minimum of one module per year.
  - b. The emission testing shall be conducted to demonstrate compliance with the following emission limitations involving DMIPA as the catalyst:
    - i. 0.60 lb of VOC per ton of sand, for core making.
  - c. When the emission unit first utilizes SO<sub>2</sub> as the catalyst for purposes other than research and development, the permittee shall conduct testing within 60 days after the initial use of SO<sub>2</sub> to demonstrate compliance with the following emission limitations when utilizing SO<sub>2</sub> as the catalyst:
    - i. 0.16 lb of SO<sub>2</sub> per ton of sand, for core making; and
    - ii. The control efficiency for SO<sub>2</sub>.
  - d. The following test methods shall be employed to demonstrate compliance with the above emission limitations:
    - i. for total VOC, Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 18, 25, or 25A (as applicable) of 40 CFR Part 60, Appendix A for determining total VOC mass emissions.
    - ii. for SO<sub>2</sub>, Methods 1-4 and 6 of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 6 of 40 CFR Part 60, Appendix A for determining SO<sub>2</sub> mass emissions.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO. The test method(s) which must be employed to demonstrate compliance with the control efficiencies are specified below.
  - e. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- f. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.
- g. During emission testing, the permittee shall also record the following information:
  - i. the pH range for the scrubbing liquid;
  - ii. the scrubber water flow rate, in gallons/minute; and
  - iii. the catalyst and resin used to make the cores.
- h. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, NWDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, NWDO 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 of the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

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

- a. Emission Limitation:

The maximum annual amount of sand processed for P525, P528, P531, P534, P536 and P539, combined, shall not exceed 114,696 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(1).

b. Emission Limitations:

0.60 lb of VOC per ton of sand (core making)

Applicable Compliance Method:

Compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

c. Emission Limitations:

0.10 lb of VOC per ton of sand (hopper and mixing)

Applicable Compliance Method:

The lb/ton emission limitation was established based on the Casting Emission Reduction Program (CERP) report #1409-123-EQ (Technikon), published 12/09/02, revised 5/06.

If required, compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

d. Emission Limitation:

0.20 lb of VOC per ton of sand (metal cleaning).

Applicable Compliance Method:

The lb/ton emission limitation was established based on the use of five 55 gallon drums of metal cleaner per month with a VOC content of 8.1 lbs per gallon with 85% captured by the scrubber [scrubber does not provide control during metal cleaning] and the use of 114,696 tons per year of sand. Compliance shall be demonstrated based on the record keeping requirements specified in d)(5).

If required, compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

e. Emission Limitations:

PM<sub>10</sub> emissions shall not exceed 0.0182 lb/ton of sand (hopper and mixing)

PM<sub>10</sub> emissions shall not exceed 0.028 lb/ton of sand (core making)

Applicable Compliance Method:

If required, compliance with the company-established emission factors shall be demonstrated based on the results of emission testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M or as amended. Alternative or equivalent methods can be used with the approval of the director.

f. Emission Limitation:

VOC emissions from emission units P525, P528, P531, P534, P536 and P539, combined, shall not exceed 51.61 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation was established by adding the VOC emissions from hopper and mixing, core making, and metal cleaning. VOC emission from hopper and mixing, core making, and metal cleaning were established by multiplying the respective VOC emission limitations of 0.10 lb/ton, 0.60 lb/ton, and 0.20 lb/ton by the annual sand throughput restriction of 114,696 tons per rolling, 12-month period, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/ton emission limitations and the annual sand throughput, compliance with the annual limitation shall also be demonstrated.

g. Emission Limitation:

Fugitive VOC emissions shall not exceed 2.0 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The emission limitation was established by multiplying the company-supplied emission factors of 0.035 lb of VOC per ton of sand by the annual sand restriction of 114,696 tons, and then dividing by 2000 lbs/ton.

h. Emission Limitation:

PM<sub>10</sub> emissions P525, P528, P531, P534, P536 and P539, combined, shall not exceed 2.67 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation was established by adding the PM<sub>10</sub> emissions from hopper/mixing, and core making. PM<sub>10</sub> emissions from hopper/mixing, and core making were established by multiplying the respective PM<sub>10</sub> emission limitations of 0.0182 lb/ton and 0.028 lb/ton by the annual sand throughput restriction of 114,696 tons per rolling, 12-month period, and then dividing by 2000 lbs/ton. Therefore, as long as compliance with the annual sand throughput

restriction is demonstrated by the record keeping requirements specified in d)(1), compliance with the annual limitation shall also be demonstrated.

i. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 9.18 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the lb/ton of sand emission limitation by the annual sand restriction of 114,696 tons and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/ton emission limitation and the annual sand throughput, compliance with the annual limitation shall be demonstrated.

j. Emission Limitation:

SO<sub>2</sub> shall not exceed 0.16 lb/ton of sand (core making)

Applicable Compliance Method:

Compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

k. Emission Limitation:

Visible PE from the stack(s) serving this emissions unit shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources" or as amended. Alternative or equivalent methods can be used with the approval of the director.

g) Miscellaneous Requirements

(1) None.

**9. Emissions Unit Group - PSand Mod#4 Core Machines: P526, P529, P532, P535, P537, P540,**

EU ID	Operations, Property and/or Equipment Description
P526	Precision Sand Mod #4 Core Machine #1
P529	Precision Sand Mod #4 Core Machine #2
P532	Precision Sand Mod #4 Core Machine #3
P535	Precision Sand Mod #4 Core Machine #4
P537	Precision Sand Mod #4 Core Machine #5
P540	Precision Sand Mod #4 Core Machine #6

- 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) b)(1)f., b)(2)e. and b)(1)g.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-10 through 20	<p>Volatile organic compound emissions (VOC) from emissions units P526, P529, P532, P535, P537 and P540, combined, shall not exceed 51.61 tons per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.</p> <p><u>Receiving hopper and sand mixer (Stacks PSand3-4 and PSand4-4)</u> VOC emissions shall not exceed 0.10 pound per ton of sand processed.</p> <p><u>Core making (Stack PSandScr4)</u> VOC emissions shall not exceed 0.60 pound per ton of sand processed.</p> <p><u>Maintenance (metal cleaning of core machine - Stack PSandScr4):</u> VOC emissions shall not exceed 0.20 pound per ton of sand processed.</p> <p>Fugitive VOC emissions shall not exceed 2.0 tpy, based on a rolling, 12-month summation of the monthly emissions.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Sulfur dioxide (SO<sub>2</sub>) emissions from emissions unit P526, P529, P532, P535, P537 and P540, combined, shall not exceed 9.18 tpy, based upon a rolling, 12-month summation of the monthly emissions.</p> <p><u>Core making (Stack PSandScr4)</u></p> <p>SO<sub>2</sub> emissions shall not exceed 0.16 pound per ton of sand processed.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(D)	<p>Particulate matter less than or equal to 10 microns in size (PM<sub>10</sub>) from emission units P526, P529, P532, P535, P537 and P540, combined, shall not exceed 2.67 tons per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.</p> <p><u>Receiving hopper and sand mixer (Stacks PSand3-4 and PSand4-4)</u></p> <p>PM<sub>10</sub> shall not exceed 0.0182 lb/ton of sand processed.</p> <p><u>Core making (Stack PSandScr4)</u></p> <p>PM<sub>10</sub> shall not exceed 0.028 lb/ton of sand processed.</p> <p>Visible PE from the stacks serving this emissions unit shall not exceed 10% opacity, as a six-minute average.</p> <p>See b)(2)b. b)(2)c. and b)(2)g.</p>
c.	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B) OAC rule 3745-18-06(E)	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D).
d.	OAC rule 3745-21-07(G)	Exempt, pursuant to OAC rule 3745-21-07(G)(9)(i). See b)(2)f.
e.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)d.
f.	OAC rule 3745-31-05(A)(3) , as effective 12/01/06	See b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
9.	OAC rule 3745-114-01 ORC 3704.03(F)	See B.2 – Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control technology (BACT) on this emissions unit for VOC and SO<sub>2</sub>. BACT has been determined to be the use of the following:
  - i. sand mixing - no control technologies were cost effective.
  - ii. core making - a packed tower wet scrubber. The wet scrubber shall achieve the following control efficiencies:
    - (a) dimethyl isopropyl amine (DMIPA) as catalyst: 99% for the DMIPA; and
    - (b) SO<sub>2</sub> as catalyst: 99.0% for SO<sub>2</sub>.
- b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) for PM<sub>10</sub>. The PTE is being restricted such that the emission increase for PM<sub>10</sub> allowed for in this permit action (P0106622) will be below the Prevention of Significant Deterioration (PSD) “significant threshold” applicability level of 15 tpy (for PM<sub>10</sub>). The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2), which require control equipment and process control:
  - i. PM<sub>10</sub> emissions shall not exceed:
    - (a) 0.0182 lb/ton of sand (receiving hopper and sand mixer),
    - (b) 0.028 lb/ton of sand (core making); and
    - (c) 2.67 tpy, based upon a rolling, 12-month summation of the monthly emissions.
- c. All emissions of particulate matter are PM<sub>10</sub>.
- d. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has

not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- e. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of VOC and SO<sub>2</sub> from this air contaminant source since the potential to emit for each is less than ten tons per year, taking into account the federally enforceable restriction on the amount of sand processed and the use of a wet scrubber.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of PM<sub>10</sub> from this air contaminant source since the potential to emit is less than ten tons per year, taking into account the federally enforceable restriction on the amount of sand processed, the use of a baghouse and cyclone.

- f. On February 18, 2008, Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirements of OAC rule 3745-21-07(G)(2) still exists as part of the federally-approved SIP of Ohio.

- g. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size (PM<sub>2.5</sub>) are being implemented through the PM<sub>10</sub> Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that PM<sub>10</sub> is a reasonable surrogate for PM<sub>2.5</sub>, all emissions of PM<sub>10</sub> will be considered PM<sub>2.5</sub>.

c) Operational Restrictions

- (1) The maximum annual sand processed in emission units P526, P529, P532, P535, P537 and P540, combined, shall not exceed 114,696 tons, based upon a rolling, 12-month summation of sand processed.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the sand processing levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Sand Usage (tons)</u>
1	10,000
1-2	20,000
1-3	30,000
1-4	40,000
1-5	50,000
1-6	60,000
1-7	70,000
1-8	80,000
1-9	90,000
1-10	100,000
1-11	110,000
1-12	114,696

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual sand restriction shall be, based upon a rolling, 12-month summation of the monthly sand processed.

- (2) The permittee shall operate the baghouse at all times when this emissions unit is in operation.

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

- (1) The permittee shall collect and record the following information each month for emissions units P526, P529, P532, P535, P537 and P540, combined:
  - a. the quantity of sand processed, in tons;
  - b. for the first 12 months of operation following the issuance of this permit, the cumulative quantity of sand processed, in tons; and
  - c. after the first 12 months operation, the quantity of sand processed, in tons, based on a rolling, 12-month summation of the monthly sand processed.

\*The amount of sand processed through this emissions unit is equivalent to the amount of sand received in emissions units P906, P907, P908 and P909, . The monitoring and record keeping associated with the sand received in emissions unit P906 can be used to fulfill the requirements in this section.

- (2) The permittee shall properly operate and maintain equipment to continuously monitor the liquor pH and the scrubber liquor flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. the catalyst gas scrubber liquor pH, on a once-per-shift basis;

- b. the catalyst gas scrubber liquor flow rate, in gallons per minute, on a once-per-shift basis; and
- c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

Whenever the monitored values for the catalyst gas scrubber liquor pH and catalyst gas scrubber liquor flow rate deviate from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable ranges 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 catalyst gas scrubber liquor pH and catalyst gas scrubber liquor flow rate 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.

- d. The catalyst gas scrubber, utilizing the DMIPA, catalyst, recirculating liquor pH shall be continuously maintained at a value of less than or equal to 5 at all times while the emissions unit is in operation, or as established during the most recent performance test that demonstrated the emissions unit was in compliance. The caustic catalyst gas scrubber, utilizing the SO<sub>2</sub> catalyst, recirculating liquor pH shall be continuously maintained at a value of greater than or equal to 9 at all times while the emissions unit is in operation, or as established during the most recent performance test that demonstrated the emissions unit was in compliance.
- e. The catalyst gas scrubber liquor flow rate shall be continuously maintained at a value of not less than 3 gallons per minute per 1,000 cfm of gas flow at all times while the emissions unit is in operation, or as established during the most recent performance test that demonstrated the emissions unit was in compliance.

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

- (3) The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the baghouse was not operating.
- (4) The permittee shall perform weekly\* checks when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse and from the cyclone serving this emissions unit. The presence or absence of any visible emissions, excluding water vapor, 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 date and time of the visible emission observation;
  - b. the identification of the stack observed;
  - c. the color of the emissions;
  - d. the total duration of any visible emission observation; and
  - e. the corrective actions, if any, taken to eliminate the visible emissions.

\*once during each normal calendar week

- (5) The permittee shall collect and record the following information on a monthly basis for the metal cleaner applied in this emissions unit:
  - a. the name and identification of each metal cleaner employed;
  - b. the VOC content of each metal cleaner, in pounds per gallon;
  - c. the number of gallons of each metal cleaner employed;
  - d. the total VOC emission rate from all metal cleaners, i.e., the summation of the products of "d)(5)b." times "d)(5)c." for all metal cleaners employed, in pounds; and
  - e. the pound per ton of VOC emissions from all metal cleaners employed [d)(5)d./d)(1)a].

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following:
  - a. for the first 12 calendar months of operation following the issuance of this permit, the restriction on the maximum allowable cumulative quantity of sand processed; and
  - b. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month restriction on the quantity of sand processed.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit deviation (excursion) reports that identify the following:
- a. any time periods when the emissions unit was in operation and the baghouse(s) was not operating; and
  - b. any exceedance of the 0.20 lb VOC/ton of sand emission limitation for the metal cleaner.

Each report shall be submitted within 30 days after the deviation occurs.

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the wet scrubber during the operation of the emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the liquid flow rate or the liquid pH was outside of the appropriate range or limit specified by the manufacturer and outside of the acceptable range for each parameter following any required compliance demonstration;
  - b. an identification of each incident of deviation described in (3)a. where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (3)a. where prompt corrective action, that would bring the liquid flow rate or scrubber liquid pH into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (3)a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

- (4) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions, excluding water vapor, were observed from the baghouse and from the cyclone serving this emissions unit and (b) describe the corrective actions, if any, taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (5) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for all four (4) precision sand modules in accordance with the following requirements:
  - a. The emissions testing shall be conducted over four (4) consecutive years, beginning no later than 180 days after achieving the maximum production rate at which Psand module 1 (emissions units P464, P465, P466, P467, P468, P469) or Psand module 2 (emissions units P524, P527, P530, P533, P538) or Psand module 3 (emissions units P525, P528, P531, P534, P536, P539) or Psand module 4 (emissions units P526, P529, P532, P535, P537, P540), will be operated, whichever comes first. The permittee shall test a minimum of one module per year.
  - b. The emission testing shall be conducted to demonstrate compliance with the following emission limitations involving DMIPA as the catalyst:
    - i. 0.60 lb per ton of sand for VOC, for core making.
  - c. When the emission unit first utilizes SO<sub>2</sub> as the catalyst for purposes other than research and development, the permittee shall conduct testing within 60 days after the initial use of SO<sub>2</sub> to demonstrate compliance with the following emission limitations when utilizing SO<sub>2</sub> as the catalyst:
    - i. 0.16 lb of SO<sub>2</sub> per ton of sand, for core making; and
    - ii. The control efficiency for SO<sub>2</sub>.
  - d. The following test methods shall be employed to demonstrate compliance with the above emission limitations:
    - i. for total VOC, Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 18, 25, or 25A (as applicable) of 40 CFR Part 60, Appendix A for determining total VOC mass emissions.
    - ii. for SO<sub>2</sub>, Methods 1-4 and 6 of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 6 of 40 CFR Part 60, Appendix A for determining SO<sub>2</sub> mass emissions.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO. The test method(s) which must be employed to demonstrate compliance with the control efficiencies are specified below.
  - e. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- f. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.
- g. During emission testing, the permittee shall also record the following information:
  - i. the pH range for the scrubbing liquid;
  - ii. the scrubber water flow rate, in gallons/minute; and
  - iii. the catalyst and resin used to make the cores.
- h. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, NWDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, NWDO 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 of the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

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

The maximum annual amount of sand processed for P526, P529, P532, P535, P537 and P540, combined, shall not exceed 114,696 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(1).

b. Emission Limitations:

0.60 lb of VOC per ton of sand (core making)

Applicable Compliance Method:

Compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

c. Emission Limitations:

0.10 lb of VOC per ton of sand (hopper and mixing)

Applicable Compliance Method:

The lb/ton emission limitation was established based on the Casting Emission Reduction Program (CERP) report #1409-123-EQ (Technikon), published 12/09/02, revised 5/06.

If required, compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

d. Emission Limitation:

0.20 lb of VOC per ton of sand (metal cleaning).

Applicable Compliance Method:

The lb/ton emission limitation was established based on the use of five 55 gallon drums of metal cleaner per month with a VOC content of 8.1 lbs per gallon with 85% captured by the scrubber [scrubber does not provide control during metal cleaning] and the use of 114,696 tons per year of sand. Compliance shall be demonstrated based on the record keeping requirements specified in d)(5).

If required, compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

e. Emission Limitations:

PM<sub>10</sub> emissions shall not exceed 0.0182 lb/ton of sand (hopper and mixing)

PM<sub>10</sub> emissions shall not exceed 0.028 lb/ton of sand (core making)

Applicable Compliance Method:

If required, compliance with the company-established emission factors shall be demonstrated based on the results of emission testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M or as amended. Alternative or equivalent methods can be used with the approval of the director.

f. Emission Limitation:

VOC emissions from emission units P525, P528, P531, P534, P536 and P539, combined, shall not exceed 51.61 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation was established by adding the VOC emissions from hopper and mixing, core making, and metal cleaning. VOC emission from hopper and mixing, core making, and metal cleaning were established by multiplying the respective VOC emission limitations of 0.10 lb/ton, 0.60 lb/ton, and 0.20 lb/ton by the annual sand throughput restriction of 114,696 tons per rolling, 12-month period, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/ton emission limitations and the annual sand throughput, compliance with the annual limitation shall also be demonstrated.

g. Emission Limitation:

Fugitive VOC emissions shall not exceed 2.0 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The emission limitation was established by multiplying the company-supplied emission factors of 0.035 lb of VOC per ton of sand by the annual sand restriction of 114,696 tons, and then dividing by 2000 lbs/ton.

h. Emission Limitation:

PM<sub>10</sub> emissions P526, P529, P532, P535, P537 and P540, combined, shall not exceed 2.67 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation was established by adding the PM<sub>10</sub> emissions from hopper/mixing, and core making. PM<sub>10</sub> emissions from hopper/mixing, and core making were established by multiplying the respective PM<sub>10</sub> emission limitations of 0.0182 lb/ton and 0.028 lb/ton by the annual sand throughput restriction of 114,696 tons per rolling, 12-month period, and then dividing by 2000 lbs/ton. Therefore as long as compliance with the annual sand throughput

restriction is demonstrated by the record keeping requirements specified in d)(1), compliance with the annual limitation shall also be demonstrated.

i. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 9.18 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the lb/ton of sand emission limitation by the annual sand restriction of 114,696 tons, and then dividing by 2000 lbs/ton. Therefore provided compliance is shown with the lb/ton emission limitation and the annual sand throughput, compliance with the annual limitation shall be demonstrated.

j. Emission Limitation:

SO<sub>2</sub> shall not exceed 0.16 lb/ton of sand (core making)

Applicable Compliance Method:

Compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

k. Emission Limitation:

Visible PE from the stack(s) serving this emissions unit shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources" or as amended. Alternative or equivalent methods can be used with the approval of the director.

g) Miscellaneous Requirements

(1) None.

**10. Emissions Unit Group - PSand Mold Cooling: P472, P521, P522, P523,**

EU ID	Operations, Property and/or Equipment Description
P472	Precision Sand Mod #1 Mold Cooling Line
P521	Precision Sand Mod #2 Mold Cooling Line
P522	Precision Sand Mod #3 Mold Cooling Line
P523	Precision Sand Mod #4 Mold Cooling Line

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) b)(1)d., b)(1)e. and b)(2)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-10 through 20	<p><u>From each emissions unit individually:</u></p> <p>Volatile organic compound (VOC) emissions shall not exceed 0.25 pounds (lbs) per ton of aluminum and 3.35 tons per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.</p> <p>Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 0.407 lb/ton of aluminum and 5.45 tpy, based upon a rolling 12-month summation of the monthly emissions.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.001 lb/ton of aluminum and 0.013 tpy, based upon a rolling 12-month summation of the monthly emissions.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(D)	<p><u>From each emissions unit individually:</u></p> <p>Particulate emissions (PE) shall not exceed 0.1 lb/ton of aluminum and 1.34 tpy, based upon a rolling, 12-month summation of the monthly emissions.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Particulate matter less than or equal to 10 microns in size (PM<sub>10</sub>) shall not exceed 0.2 lb/ton of aluminum and 2.68 tpy, based upon a rolling 12-month summation of the monthly emissions.</p> <p>Visible PE shall not exceed 10% opacity, as a six-minute average.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.37 lb/ton of aluminum and 4.95 tpy, based upon a rolling 12-month summation of the monthly emission.</p> <p>See b)(2)b. and b)(2)e.</p>
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c.
d.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.
e.	OAC rule 3745-114-01 ORC 3704.03(F)	See B.2 – Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

- a. Based on the “Prevention of Significant Deterioration” (PSD) analysis conducted to ensure the application of “Best Available Control Technology” (BACT), it has been determined that the permittee shall employ the following:
  - i. VOC emissions:
    - (a) A regenerative thermal oxidizer (RTO). The RTO shall meet a minimum control efficiency of 95% for VOC emissions.
  - ii. SO<sub>2</sub> and NO<sub>x</sub> emissions:
    - (a) No control technologies are cost effective.
- b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) for PE and PM<sub>10</sub>. The PTE is being restricted such that emission increase for PE and PM<sub>10</sub> allowed for in this permit action (P0106622) will be below the Prevention of Significant Deterioration (PSD) “significant threshold” applicability level of 25 tpy (for PE) and 15 tpy (for PM<sub>10</sub>). The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2), which require control equipment and an annual usage restriction:

- i.  $PM_{10}$  emissions shall not exceed 0.20 lb per ton of aluminum and 2.68 tpy, based upon a rolling 12-month summation of the monthly emissions; and
  - ii. PE shall not exceed 0.1 lb/ton of aluminum and 1.34 tpy, based upon a rolling 12-month summation of the monthly emissions.
- c. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by the U.S. EPA.

- d. This paragraph applies once the U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

BAT requirements under OAC rule 374-31-05(A)(3)(a), as effective December 1, 2006, do not apply to VOC,  $SO_2$ ,  $NO_x$ , CO, and  $PM_{10}$  emissions from this air contaminant source since the potential to emit for each is each less than ten tons per year taking into account the federally enforceable requirements established under OAC rule 3745-31-05(D). BAT requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

- e. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size ( $PM_{2.5}$ ) are being implemented through the  $PM_{10}$  Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that  $PM_{10}$  is a reasonable surrogate for  $PM_{2.5}$ , all emissions of  $PM_{10}$  will be considered  $PM_{2.5}$ .
- f. The permittee will be allowed a 180-day operational shakedown period during which VOC emissions from these emissions unit will not be required to meet the

control requirements contained in b)(2)a. or the requirements contained in the following sections:

- i. d)(3), d)(4) and e)(3).

During the shakedown period VOC emissions shall not exceed 25.4 lbs per day. The shakedown period begins on the day this emissions unit is operated under the provisions of this administrative modification and shall not exceed 180 days following the beginning of the shakedown period.

c) Operational Restrictions

- (1) The maximum annual aluminum usage for these emissions units shall not exceed 26,762 tons, individually, based upon a rolling, 12-month summation of the monthly quantities of aluminum used.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the aluminum usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Aluminum Usage (tons)</u>
1	2,680
1-2	5,360
1-3	8,040
1-4	10,720
1-5	13,400
1-6	16,080
1-7	18,760
1-8	21,440
1-9	24,120
1-10	25,013
1-11	25,907
1-12	26,762

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual aluminum usage restriction shall be based upon a rolling, 12-month summation of the monthly quantity of aluminum poured in emissions units F008, F009, F010, F011 and F012.

- (2) The permittee shall operate the baghouses at all times when these emissions units are in operation.

d) Monitoring and/or Record keeping Requirements

- (1) The permittee shall collect and record the following information each month for these emissions units, individually:
  - a. the amount of aluminum processed, in tons;

- b. for the first 12 months of operation following the issuance of this permit, the cumulative quantity of aluminum processed, in tons; and
- c. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly amount of aluminum processed.

\*The amount of aluminum processed through these emissions units is equivalent to the amount of aluminum poured in emissions units F008, F009, F010, F011 and F012. The monitoring and record keeping associated with the aluminum processed in emissions units F008, F009, F010, F011 and F012 can be used to fulfill the requirements in this section.

- (2) The permittee shall perform weekly\* checks when these emissions units are in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions, excluding water vapor, 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 date and time of the visible emission observation;
  - b. the identification of the stack observed;
  - c. the color of the emissions;
  - d. the total duration of any visible emission observation; and
  - e. the corrective actions, if any, taken to eliminate the visible emissions.

\*once during each normal calendar week

- (3) The permittee shall properly install, operate, and maintain a continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation. The permittee shall record the combustion temperature on a continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual(s). The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted and the appropriate temperature range is established to demonstrate compliance. These records shall be maintained at the facility for a period of no less than three years.
- (4) Whenever the monitored average combustion temperature within the thermal oxidizers deviate from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
  - a. the date and time the deviation began;
  - b. the magnitude of the deviation at that time;
  - c. the date the investigation was conducted;

- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, 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. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the temperature readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do 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 temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of administrative permit modification.

- (5) The permittee shall maintain records documenting any time periods when these emissions units were in operation and the baghouses were not operating.
  - (6) The permittee shall collect and record the following information each day during the shakedown period:
    - a. The amount of aluminum processed, in tons; and
    - b. The VOC emissions, in pounds per day, calculated by multiplying d)(6)a by an emission factor of 5 lbs of VOC per ton of aluminum processed.
- e) Reporting Requirements
- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions, excluding water vapor, were observed from the

stacks serving these emissions units and (b) describe the corrective actions, if any, taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (2) The permittee shall submit deviation (excursion) reports that identify any time periods when these emissions units were in operation and the baghouses were not operating. Each report shall be submitted within 30 days after the deviation occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the thermal oxidizers during the operation of these emissions units:
  - a. Each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizers were outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;
  - b. Each period of time (start time and date, and end time and date) when the emissions units were in operation and the process emissions were not vented to the thermal oxidizers;
  - c. an identification of each incident of deviation described in "a." or "b." where prompt corrective action, that would bring the emissions units into compliance and/or the temperature within the thermal oxidizers into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in "a." or "b." where proper records were not maintained for the investigation and/or the corrective action(s).

If no deviations /excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

- (4) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following:
  - a. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative aluminum usage restriction; and
  - b. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month aluminum usage restriction.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (5) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing an exceedance of the 25.4 lbs VOC/day emission limitation required during the operational shakedown period. The

notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

- (6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for all four (4) precision sand modules in accordance with the following requirements:

a. The emissions testing shall be conducted over four (4) consecutive years, beginning no later than 180 days after achieving the maximum production rate at which Psand module 1 (emissions units P472), Psand module 2 (emissions units P521), Psand module 3 (emissions units P522) or Psand module 4 (emissions units P523), will be operated, whichever comes first. The permittee shall test a minimum of one module per year.

b. The emission testing shall be conducted to demonstrate compliance with the following:

- i. for VOC - 0.25 lb/ton of aluminum;
- ii. for NO<sub>x</sub> – 0.407 lb/ton of aluminum;
- iii. for CO – 0.37 lb/ton of aluminum;
- iv. compliance with the control efficiency limitation for VOCs from the RTO controlling this emissions unit.

c. The following test methods shall be employed to demonstrate compliance with the above emission limitations:

- i. for total VOC, Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 18, 25, or 25A (as applicable) of 40 CFR Part 60, Appendix A for determining total VOC mass emissions;
- ii. for NO<sub>x</sub>, Methods 1-4 and 7 of 40 CFR Part 60, Appendix A; and
- iii. for CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO. The test method(s) which must be employed to demonstrate compliance with the control efficiencies are specified below.

d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the

test methods and procedures specified in Methods 18, 25, or 25A (as applicable) of 40 CFR Part 60, Appendix A for VOC emissions .

- e. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."
- f. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.
- g. During emission testing, the permittee shall also record the average combustion temperature within the thermal incinerator, in degrees Fahrenheit.
- h. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, NWDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, NWDO 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 of the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

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

- a. Emission Limitation:

The maximum annual amount of aluminum processed shall not exceed 26,762 tons 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(2).

b. Emission Limitations:

VOC emissions shall not exceed 0.25 lb/ton of aluminum and 3.35 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the lb/ton emission limitation shall be demonstrated based on the results of the emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the lb/ton of aluminum emission limitation by the annual aluminum throughput restriction of 26,762 tons per rolling, 12-month period, and then dividing by 2000 lbs/ton. Therefore provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation shall be demonstrated.

c. Emission Limitations:

PE shall not exceed 0.10 lb/ton of aluminum and 1.34 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

If required, compliance with the lb/ton emission limitation shall be demonstrated based on the results of the emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the 0.10 lb PE/ton of aluminum emission limitation by the annual aluminum throughput restriction of 26,762 tons per rolling, 12-month period, and then dividing by 2000 lbs/ton. Therefore provided compliance is shown with the lb/ton emission limitation and the annual sand throughput, compliance with the annual limitation shall be demonstrated.

d. Emission Limitations:

Filterable PM<sub>10</sub> shall not exceed 0.20 lb/ton of aluminum and 2.68 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

If required, compliance with the lb/ton emission limitation shall be demonstrated based on the results of the emission testing conducted in accordance with

Methods 201/201A of 40 CFR Part 51, Appendix M or as amended. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the 0.20 lb filterable PM<sub>10</sub>/ton of aluminum emission limitation by the annual aluminum throughput restriction of 26,762 tons per rolling, 12-month period, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation will be demonstrated.

e. Emission Limitations:

SO<sub>2</sub> emissions shall not exceed 0.001 lb/ton of aluminum and 0.013 tpy, based on a rolling 12-month summation of the monthly emissions.

Applicable Compliance Method:

If required, compliance with the lb/ton emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director. The lb/ton was established based on the AP42 emission factor of 0.60 lb/mmscf and the maximum burner rate of 13.5 mmBtu/hr.

The annual emission limitation was established by multiplying the 0.001 lb SO<sub>2</sub>/ton of aluminum emission limitation by the annual aluminum throughput restriction of 26,762 tons per rolling, 12-month period, and then dividing by 2000 lbs/ton. Therefore, as long as compliance with the annual aluminum throughput restriction is demonstrated by the record keeping requirements specified in d)(1), compliance with the annual limitation will be demonstrated.

f. Emission Limitation:

Visible PE from the stack(s) serving this emissions unit shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources" or as amended. Alternative or equivalent methods can be used with the approval of the director.

g. Emission Limitations:

NO<sub>x</sub> shall not exceed 0.407 lb/ton of aluminum and 5.45 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the lb/ton emission limitation shall be demonstrated based on the results of the emission testing conducted in accordance with Methods 1-4

and 7 of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the 0.407 lb NO<sub>x</sub>/ton of aluminum emission limitation by the annual aluminum throughput restriction of 26,762 tons per rolling, 12-month period, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation shall be demonstrated.

h. Emission Limitations:

CO shall not exceed 0.37 lb/ton of aluminum and 4.95 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the lb/ton emission limitation shall be demonstrated based on the results of the emission testing conducted in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the 0.37 lb CO/ton of aluminum emission limitation by the annual aluminum throughput restriction of 26,762 tons per rolling, 12-month period, and then dividing by 2000 lbs/ton. Therefore provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation shall be demonstrated.

i. Emission Limitation:

The regenerative thermal oxidizer shall meet a minimum control efficiency of 95% for VOC emissions.

Applicable Compliance Method:

Compliance with the control efficiency requirements above shall be demonstrated based on the results of emission testing conducted in accordance with the methods outlined in f)(1).

j. Emission Limitation:

VOC emissions during the operational shakedown period shall not exceed 25.4 lbs per day.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.

**11. Emissions Unit Group - PSand Mold Fill: F008, F010, F011, F012,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
F008	Precision Sand Mod #1 Mold Fill Pouring Station
F010	Precision Sand Mod #2 Mold Fill Pouring Station
F011	Precision Sand Mod #3 Mold Fill Pouring Station
F012	Precision Sand Mod #4 Mold Fill Pouring Station

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) b)(1)f and b)(2)e.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-10 through 20	<u>From each emissions unit individually:</u>  Volatile organic compound (VOC) emissions shall not exceed 1.34 tons per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.  See b)(2)a.
b.	OAC rule 3745-31-05(D)	<u>From each emissions unit individually:</u>  Particulate emissions (PE) shall not exceed 0.13 tpy, based upon a rolling, 12-month summation of the monthly emissions.  Particulate matter less than or equal to 10 microns in size (PM <sub>10</sub> ) shall not exceed 0.25 tpy, based upon a rolling, 12-month summation of the monthly emissions.  See b)(2)b. and b)(2)f.
c.	OAC rule 3745-17-08(B)(3)	See b)(2)c.
d.	OAC rule 3745-17-07(B)	Visible PE shall not exceed 20% opacity as a three-minute average, except as provided by rule.
e.	OAC rule 3745-31-05(A)(3), as	See b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	effective 11/30/01	
f.	OAC rule 3745-31-05(A)(3) , as effective 12/01/06	See b)(2)e.

(2) Additional Terms and Conditions

- a. Based on the “Prevention of Significant Deterioration” (PSD) analysis conducted to ensure the application of “Best Available Control Technology” (BACT), it has been determined that no control technologies VOC were cost effective.
- b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) for PE and PM<sub>10</sub>. The PTE is being restricted such that emission increase for PE and PM<sub>10</sub> allowed for in this permit action (P0106622) will be below the Prevention of Significant Deterioration (PSD) “significant threshold” applicability level of 25 tpy (for PE) and 15 tpy (for PM<sub>10</sub>). The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2), which require control equipment and process control:
- c. The permittee shall utilize reasonable available control measures (RACM) that are sufficient to minimize or eliminate visible emissions of fugitive dust. In accordance with the permittee’s permit application, the permittee has committed to perform the following control measure to ensure compliance:
  - i. Building enclosure.

Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.
- d. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by the U.S. EPA.

- e. This paragraph applies once the U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

BAT requirements under OAC rule 374-31-05(A)(3)(a), as effective December 1, 2006, do not apply to VOC, PE and PM<sub>10</sub> emissions from this air contaminant source since the potential to emit for each is less than ten tons per year taking into account the federally enforceable requirements established under OAC rule 3745-31-05(D).

- f. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size (PM<sub>2.5</sub>) are being implemented through the PM<sub>10</sub> Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that PM<sub>10</sub> is a reasonable surrogate for PM<sub>2.5</sub>, all emissions of PM<sub>10</sub> will be considered PM<sub>2.5</sub>.

c) Operational Restrictions

- (1) The maximum annual aluminum usage for these emissions units, individually, shall not exceed 26,762 tons, based upon a rolling, 12-month summation of the monthly quantities of aluminum used.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the aluminum usage levels specified in the following table for emissions units F008, F010, F011 and F012, individually:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Aluminum Usage (tons)</u>
1	2,680
1-2	5,360
1-3	8,040
1-4	10,720
1-5	13,400
1-6	16,080
1-7	18,760
1-8	21,440
1-9	24,120
1-10	25,013
1-11	25,907
1-12	26,762

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual aluminum usage restriction shall be based upon a rolling, 12-month summation of the monthly quantity of aluminum poured in emissions units F008, F010, F011 and F012, individually.

d) Monitoring and/or Record keeping Requirements

- (1) The permittee shall collect and record the following information each month for these emissions units F008, F010, F011 and F012, individually:

- a. the amount of aluminum processed, in tons;
  - b. for the first 12 months of operation following the issuance of this permit, the cumulative quantity of aluminum processed, in tons; and
  - c. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly amount of aluminum processed.
- (2) The permittee shall perform weekly\* checks when these emissions units are in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) of the building containing these emissions units. 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 emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

\*once during each normal calendar week

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that identify:
- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) of the building containing these emissions units; and
  - b. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (2) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following:
- a. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative aluminum usage restriction; and
  - b. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month aluminum usage restriction.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

The maximum annual amount of aluminum processed shall not exceed 26,762 tons 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(1).

b. Emission Limitation:

VOC emissions shall not exceed 1.34 tpy, based upon a rolling, 12 month summation of the monthly emissions, for emissions units F008, F010, F011 and F012, individually.

Applicable Compliance Method:

The emission limitation was established by multiplying the company-supplied emission factor of 0.10 pounds per ton (lbs/ton) of aluminum by the annual aluminum restriction of 26,762 tons and dividing by 2000 lbs/ton. If required, testing to verify the accuracy of the emission factor shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A. Alternative or equivalent methods can be used with the approval of the director.

c. Emission Limitation:

PE shall not exceed 0.13 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The emission limitation was established by multiplying the company-supplied emission factor of 0.0097 lb/ton of aluminum by the annual aluminum restriction of 26,762 tons and dividing by 2000 lbs/ton. If required, testing to verify the accuracy of the emission factor shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A. Alternative or equivalent methods can be used with the approval of the director.

d. Emission Limitation:

Filterable PM<sub>10</sub> shall not exceed 0.25 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The emission limitation was established by multiplying the company-supplied emission factor of 0.019 lb/ton of aluminum by the annual aluminum restriction of 26,762 tons and dividing by 2000 lbs/ton. If required, testing to verify the accuracy of the emission factor shall be demonstrated based on the results of emission testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M or as amended. Alternative or equivalent methods can be used with the approval of the director.

e. Emission Limitation:

Visible PE from the egress points of the building containing this emissions unit shall not exceed 20% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources" or as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. Alternative or equivalent methods can be used with the approval of the director.

g) Miscellaneous Requirements

(1) None.

**12. Emissions Unit Group - PSand Mold Shakeout: P473, P518, P519, P520,**

EU ID	Operations, Property and/or Equipment Description
P473	Precision Sand Mod #1 Mold Shakeout with Duct Burner
P518	Precision Sand Mod #2 Mold Shakeout with Duct Burner
P519	Precision Sand Mod #3 Mold Shakeout with Duct Burner
P520	Precision Sand Mod #4 Mold Shakeout with Duct Burner

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) b)(1)d. and b)(2)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-10 through 20	<p><u>For each emissions unit individually:</u></p> <p>Volatile organic compound (VOC) emissions shall not exceed 0.95 pounds (lbs) per ton of aluminum and 12.71 tons per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.</p> <p>Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 0.63 lb/ton of aluminum and 8.43 tpy, based upon a rolling 12-month summation of the monthly emissions.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.002 lb/ton of aluminum and 0.030 tpy, based upon a rolling 12-month summation of the monthly emissions.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(D)	<p><u>For each emissions unit individually:</u></p> <p>Carbon monoxide (CO) emissions shall not exceed 0.57 lb/ton of aluminum and 7.63 tpy, based upon a rolling, 12-month summation of the monthly emissions.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Particulate emissions (PE) shall not exceed 0.17 lb/ton of aluminum and 2.27 tpy, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>Particulate matter emissions less than or equal to 10 microns in size (PM<sub>10</sub>) shall not exceed 0.35 lb/ton of aluminum and 4.68 tpy, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>Visible PE shall not exceed 10% opacity, as a six-minute average.</p> <p>See b)(2)b. and b)(2)e.</p>
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c.
d.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.
e.	OAC rule 3745-17-11(B) OAC rule 3745-17-07(A)	The emission limitations specified by these rules are less stringent than the emission limitations specified by OAC rule 3745-31-05(D).
f.	OAC rule 3745-18-06	These emissions units are exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(A).

(2) Additional Terms and Conditions

- a. Based on the “Prevention of Significant Deterioration” (PSD) analysis conducted to ensure the application of “Best Available Control Technology” (BACT), it has been determined that the permittee shall employ the following:
  - i. VOC emissions:
    - (a) A regenerative thermal oxidizer (RTO). The RTO shall meet a minimum control efficiency of 95% for VOC emissions.
  - ii. SO<sub>2</sub> and NO<sub>x</sub> emissions:
    - (a) No control technologies are cost effective.
- b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) for PE and PM<sub>10</sub>. The PTE is being restricted such that emission increase for PE and PM<sub>10</sub> allowed for in this permit action (P0106622) will be below the Prevention of Significant Deterioration (PSD) “significant threshold” applicability level of 25 tpy (for PE) and 15 tpy (for

PM<sub>10</sub>). The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2), which require control equipment and process control:

- i. PM<sub>10</sub> emissions shall not exceed 0.35 lb/ton of aluminum and 4.68 tpy, based upon a rolling, 12-month summation of the monthly emissions; and
  - ii. PE shall not exceed 0.17 lb/ton of aluminum and 2.27 tpy, based upon a rolling, 12-month summation of the monthly emissions.
- c. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by the U.S. EPA.

- d. This paragraph applies once the U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

BAT requirements under OAC rule 374-31-05(A)(3)(a), as effective December 1, 2006, do not apply to SO<sub>2</sub>, NO<sub>x</sub>, CO, PE and PM<sub>10</sub> emissions from this air contaminant source since the potential to emit for each is less than ten tons per year taking into account the federally enforceable requirements established under OAC rule 3745-31-05(D).

- e. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size (PM<sub>2.5</sub>) are being implemented through the PM<sub>10</sub> Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that PM<sub>10</sub> is a reasonable surrogate for PM<sub>2.5</sub>, all emissions of PM<sub>10</sub> will be considered PM<sub>2.5</sub>.
- f. The permittee will be allowed a 180-day operational shakedown period during which VOC emissions from this emissions unit will not be required to meet the control requirements contained in b)(2)a. or the requirements contained in the following sections:
- i. d)(3), d)(4) and e)(3).

During the shakedown period VOC emissions shall not exceed 96 lbs per day. The shakedown period begins on the day this emissions unit is operated under the provisions of this administrative modification and shall not exceed 180 days following the beginning of the shakedown period.

c) Operational Restrictions

- (1) The maximum annual aluminum usage for this emissions unit shall not exceed 26,762 tons, based upon a rolling, 12-month summation of the monthly quantities of aluminum used.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the aluminum usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Aluminum Usage (tons)</u>
1	2,680
1-2	5,360
1-3	8,040
1-4	10,720
1-5	13,400
1-6	16,080
1-7	18,760
1-8	21,440
1-9	24,120
1-10	25,013
1-11	25,907
1-12	26,762

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual aluminum usage restriction shall be based upon a rolling, 12-month summation of the monthly quantity of aluminum poured in emissions units F008, F009, F010, F011 and F012.

- (2) The permittee shall operate the bag houses at all times when these emissions units are in operation.

d) Monitoring and/or Record keeping Requirements

- (1) The permittee shall collect and record the following information each month for these emissions units, individually:
  - a. the amount of aluminum processed, in tons;
  - b. for the first 12 months of operation following the issuance of this permit, the cumulative quantity of aluminum processed, in tons; and
  - c. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly amount of aluminum processed.

\*The amount of aluminum processed through this emissions unit is equivalent to the amount of aluminum poured in emissions units F008, F009, F010, F011 and F012. The monitoring and record keeping associated with the aluminum processed in emissions units F008, F009, F010, F011 and F012 can be used to fulfill the requirements in this section.

- (2) The permittee shall perform weekly\* checks when these emissions units are in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions, excluding water vapor, 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 date and time of the visible emission observation;
  - b. the identification of the stack observed;
  - c. the color of the emissions;
  - d. the total duration of any visible emission observation; and
  - e. the corrective actions, if any, taken to eliminate the visible emissions.

\*once during each normal calendar week

- (3) The permittee shall maintain records documenting any time periods when these emissions unit were in operation and the baghouses were not operating. The permittee shall properly install, operate, and maintain a continuous temperature monitors and recorder(s) that measure and record(s) the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation. The permittee shall record the combustion temperature on a continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual(s). The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted and the appropriate temperature range is established to demonstrate compliance. These records shall be maintained at the facility for a period of no less than three years.
- (4) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
  - b. the magnitude of the deviation at that time;
  - c. the date the investigation was conducted;
  - d. the name(s) of the personnel who conducted the investigation; and
  - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, 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. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the temperature readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do 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 temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of administrative permit modification.

- (5) The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the baghouse was not operating.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions, excluding water vapor, were observed from the stack(s) serving this emissions unit and (b) describe the corrective actions, if any, taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (2) The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the baghouse was not operating. Each report shall be submitted within 30 days after the deviation occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the thermal oxidizer during the operation of this emissions unit(s):

- a. Each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal; oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;
- b. Each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the thermal oxidizer;
- c. an identification of each incident of deviation described in "a." or "b." where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in "a." or "b." where proper records were not maintained for the investigation and/or the corrective action(s).

If no deviations /excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

- (4) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following:
  - a. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable monthly cumulative aluminum usage restriction; and
  - b. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month aluminum usage restriction.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for all four (4) precision sand modules in accordance with the following requirements:
  - a. The emissions testing shall be conducted over four (4) consecutive years, beginning no later than 180 days after achieving the maximum production rate at which Psand module1 (emissions units P473), Psand module 2 (emissions units P518), Psand module 3 (emissions units P519) or Psand module 4 (emissions units P520), will be operated, whichever comes first.

- b. The emission testing shall be conducted to demonstrate compliance with the following:
  - i. for VOC - 0.95 lb/ton of aluminum;
  - ii. for NO<sub>x</sub> – 0.63 lb/ton of aluminum;
  - iii. for CO – 0.57 lb/ton of aluminum; and
  - iv. compliance with the VOC control efficiency from the RTO controlling this emissions unit.
  
- c. The following test methods shall be employed to demonstrate compliance with the above emission limitations:
  - i. for total VOC, Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 18, 25, or 25A (as applicable) of 40 CFR Part 60, Appendix A for determining total VOC mass emissions;
  - ii. for NO<sub>x</sub>, Methods 1-4 and 7 of 40 CFR Part 60, Appendix A; and
  - iii. for CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO. The test method(s) which must be employed to demonstrate compliance with the control efficiencies are specified below.
  
- d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25A (as applicable) of 40 CFR Part 60, Appendix A for VOC emissions .
  
- e. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."
  
- f. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.
  
- g. During emission testing, the permittee shall also record the average combustion temperature within the thermal incinerator, in degrees Fahrenheit.

- h. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, NWDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, NWDO 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 of the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

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

a. Emission Limitation:

The maximum annual amount of aluminum processed shall not exceed 26,762 tons 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(1).

b. Emission Limitations:

VOC emissions shall not exceed 0.95 lb/ton of aluminum and 12.71 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the lb/ton emission limitation shall be demonstrated based on the results of the emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the lb/ton of aluminum emission limitation by the annual aluminum restriction of 26,762 tons and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation will be demonstrated.

c. Emission Limitations:

PE shall not exceed 0.17 lb/ton of aluminum and 2.27 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the lb/ton emission limitation shall be demonstrated based on the results of the emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the lb/ton of aluminum emission limitation by the annual aluminum restriction of 26,762 tons and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation will be demonstrated.

d. Emission Limitations:

PM<sub>10</sub> shall not exceed 0.35 lb/ton of aluminum and 4.68 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the lb/ton emission limitation shall be demonstrated based on the results of the emission testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M or as amended. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the lb/ton of aluminum emission limitation by the annual aluminum restriction of 26,762 tons and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation will be demonstrated.

e. Emission Limitations:

SO<sub>2</sub> emissions shall not exceed 0.002 lb/ton of aluminum and 0.030 tpy, based on a rolling 12-month summation of the monthly emissions.

Applicable Compliance Method:

If required, compliance with the lb/ton emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director. The lb/ton was established based on the AP42 emission factor of 0.6 lb/mmscf and the maximum burner rate of 21.5 mmBtu/hr.

The annual emission limitation was established by multiplying the lb/ton of aluminum emission limitation by the annual aluminum restriction of 26,762 tons

and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation will be demonstrated.

f. Emission Limitations:

NO<sub>x</sub> emissions shall not exceed 0.63 lb/ton of aluminum and 8.43 tpy, based on a rolling 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the lb/ton of aluminum emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 7 of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the lb/ton of aluminum emission limitation by the annual aluminum restriction of 26,762 tons and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation will be demonstrated.

g. Emission Limitations:

CO emissions shall not exceed 0.57 lb/ton of aluminum and 7.63 tpy, based on a rolling 12-month summation of the monthly emissions.

Applicable Compliance Method:

If required, compliance with the lb/ton emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

The annual emission limitation was established by multiplying the lb/ton of aluminum emission limitation by the annual aluminum restriction of 26,762 tons and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation will be demonstrated.

h. Emission Limitation:

Visible PE from the stack(s) serving this emissions unit shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources" or as amended. Alternative or equivalent methods can be used with the approval of the director.

i. Emission Limitation:

The regenerative thermal oxidizer shall meet a minimum control efficiency of 95% for VOC emissions.

Applicable Compliance Method:

Compliance with the control efficiency requirements above shall be demonstrated based on the results of emission testing conducted in accordance with the methods outlined in f)(1).

g) Miscellaneous Requirements

(1) None.

**13. Emissions Unit Group - PSand Receiving/Storage: P906, P907, P908, P909,**

EU ID	Operations, Property and/or Equipment Description
P906	Precision Sand Mod #1 Receiving and Storage
P907	Precision Sand Mod #2 Receiving and Storage
P908	Precision Sand Mod #3 Receiving and Storage
P909	Precision Sand Mod #4 Receiving and Storage

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) b)(1)f. and b)(2)e.

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 3745-17-07(B)	Visible fugitive particulate emissions (PE) shall not exceed 20% opacity, as a three-minute average, except as provided by rule.
b.	OAC rule 3745-17-08(B)(3)	The permittee shall utilize reasonable available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.  See b)(2)b.
c.	OAC rule 3745-31-05(D)	<u>Stack emissions from each emissions unit individually:</u>  Particulate matter less than or equal to 10 microns in size (PM <sub>10</sub> ) shall not exceed 3.43 tons per year (tpy) based upon a rolling, 12-month summation of the monthly emissions.  <u>250-ton storage sand silo (Stack no. 2)</u> PM <sub>10</sub> emissions shall not exceed 0.0455 pound (lb) per ton of sand processed, from each emissions unit individually.  <u>2,70-ton sand storage bins (Stack no. 3)</u> PM <sub>10</sub> emissions shall not exceed 0.0145

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>lb/ton of sand processed, from each emissions unit individually.</p> <p>Fugitive PM<sub>10</sub> emissions shall not exceed 0.50 tpy, based upon a rolling 12-month summation of the monthly emissions.</p> <p>Visible PE from the stacks serving these emissions units shall not exceed 10% opacity, as a six-minute average.</p> <p>See b)(2)b. b)(2)c. and b)(2)f.</p>
d.	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D).
e.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)d.
f.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)e.

(2) Additional Terms and Conditions

a. Each emissions units includes the following material handling operations:

- i. one exterior receiving hopper (exhausted to stack 2);
- ii. one intermediate storage bin (exhausted to stack 3); and
- iii. two storage bins (exhausted to stack 3).

These emissions units are partially abated with two dust collectors and the receiving station (fugitive emissions) are shared by emissions units P906, P907, P908 and P909.

b. All emissions of particulate matter are PM<sub>10</sub>.

c. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) for PM<sub>10</sub>. The PTE is being restricted such that emission increase for PM<sub>10</sub> allowed for in this permit action (P0106622) will be below the Prevention of Significant Deterioration (PSD) “significant threshold” applicability level of 15 tpy (for PM<sub>10</sub>). The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2), which require control equipment and process control:

- i. Stack PM<sub>10</sub> emissions shall not exceed 3.43 tons per year (tpy) based upon a rolling, 12-month summation of the monthly emissions.

- d. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by the U.S. EPA.

- e. This paragraph applies once the U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

BAT requirements under OAC rule 374-31-05(A)(3)(a), as effective December 1, 2006, do not apply to PM<sub>10</sub> emissions from this air contaminant source since the potential to emit is less than ten tons per year taking into account the federally enforceable requirements established under OAC rule 3745-31-05(D).

- f. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size (PM<sub>2.5</sub>) are being implemented through the PM<sub>10</sub> Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that PM<sub>10</sub> is a reasonable surrogate for PM<sub>2.5</sub>, all emissions of PM<sub>10</sub> will be considered PM<sub>2.5</sub>.

c) **Operational Restrictions**

- (1) The maximum annual sand usage for these emissions unit shall not exceed 114,696 tons, based upon a rolling, 12-month summation of the monthly quantities of sand used.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the sand usage levels specified in the following table:

Month(s)	<u>Maximum Allowable Cumulative Sand Usage (tons)</u>
1	10,000
1-2	20,000
1-3	30,000
1-4	40,000
1-5	50,000
1-6	60,000

1-7	70,000
1-8	80,000
1-9	90,000
1-10	100,000
1-11	110,000
1-12	114,696

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual sand usage restriction shall be based upon a rolling, 12-month summation of the monthly quantity of sand processed.

- (2) The permittee shall operate the baghouses at all times when these emissions units are in operation.

d) **Monitoring and/or Record keeping Requirements**

- (1) The permittee shall collect and record the following information each month for these emissions units, individually:

- a. the amount of sand processed, in tons;
- b. for the first 12 months of operation following the issuance of this permit, the cumulative quantity of and processed, in tons; and
- c. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly amount of sand processed.

- (2) The permittee shall perform weekly\* checks when these emissions units are in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions, excluding water vapor, 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 date and time of the visible emission observation;
- b. the identification of the stack observed;
- c. the color of the emissions;
- d. the total duration of any visible emission observation; and
- e. the corrective actions, if any, taken to eliminate the visible emissions.

\*once during each normal calendar week

- (3) The permittee shall maintain records documenting any time periods when these emissions units were in operation and the baghouses were not operating.

e) **Reporting Requirements**

- (1) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following:

- a. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative sand usage restriction; and
- b. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month sand usage restriction.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions, excluding water vapor, were observed from the stacks serving these emissions units and (b) describe the corrective actions, if any, taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (3) The permittee shall submit deviation (excursion) reports that identify any time periods when these emissions units were in operation and the baghouses were not operating. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

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

a. Emission Limitation:

The maximum annual sand usage shall not exceed 114,696 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by the record keeping requirements specified in d)(1).

b. Emission Limitations:

Stack PM<sub>10</sub> emissions shall not exceed 0.0455 lb/ton of sand received from stack 2, 0.0145 lb/ton of sand received from stack 3, and 3.43 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

If required, compliance with the lb/ton emission limitations shall be demonstrated based on the results of emission testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative or equivalent methods can be used with the approval of the director.

The annual limitation was established by multiplying the company-supplied emission factors of 0.0455 and 0.0145 lbs of PM<sub>10</sub> per ton of sand by the annual sand received of 114,696 tons. Compliance will be demonstrated provided

compliance is shown with the annual sand received restriction and the emission factors of 0.0455 and 0.0145 lbs/ton of sand.

c. Emission Limitations:

Fugitive PM<sub>10</sub> emissions shall not exceed 0.50 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The emission limitation was established by multiplying the company-supplied emission factor of 0.0087 lb/ton of sand by the annual sand restriction of 114,696 tons and dividing by 2000 lbs/ton. If required, testing to verify the accuracy of the emission factor shall be demonstrated based on the results of emission testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M or as amended. Alternative or equivalent methods can be used with the approval of the director.

d. Emission Limitation:

Visible PE from the baghouse stack(s) shall not exceed 10% opacity

Applicable Compliance Method:

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

e. Emission Limitation:

Visible fugitive PE shall not exceed 20% opacity, as a three-minute average, except as provided by rule, from the unloading operation at the sand receiving station.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

(1) None.

**14. Emissions Unit Group - PSand Stack Melters: P544, P545,**

EU ID	Operations, Property and/or Equipment Description
P544	Precision Sand Mod #3 Stack Melter #1
P545	Precision Sand Mod #4 Stack Melter #2

- 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) b)(1)f. and b)(2)d.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-10 through 20	<p><u>From each emissions unit individually:</u></p> <p>Volatile organic compound (VOC) emissions shall not exceed 0.023 pound per ton of aluminum and 0.31 tons per year (tpy), based upon a rolling 12-month summation of the monthly emissions.</p> <p>Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 0.430 lb/ton of aluminum and 5.75 tpy, based upon a rolling 12-month summation of the monthly emissions.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.003 lb per ton of aluminum and 0.04 tpy, based upon a rolling 12-month summation of the monthly emissions.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(D)	<p><u>From each emissions unit individually:</u></p> <p>Particulate matter less than or equal to 10 microns in size (PM<sub>10</sub>) shall not exceed 17.96 pounds (lbs) per day and 3.27 tpy (melting, fluxing and drossing).</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.361 lb/ton of aluminum and</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		4.83 tpy, based upon a rolling 12-month summation of the monthly emissions.  See b)(2)b., b)(2)c. and b)(2)f.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average.
d.	OAC rule 3745-17-11(B) OAC rule 3745-18-06(E)	The emission limitations specified by these rules are less stringent than the emission limitations established by OAC rule 3745-31-05(D).
e.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c.
f.	OAC rule 3745-31-05(A)(A)(3), as effective 12/01/06	See b)(2)d.

(2) Additional Terms and Conditions

- a. Based on the “Prevention of Significant Deterioration” (PSD) analysis conducted to ensure the application of “Best Available Control technology” (BACT), it has been determined that no control technologies for VOC, NO<sub>x</sub> and SO<sub>2</sub> were cost effective.
- b. All emissions of PE are PM<sub>10</sub>.
- c. This permit establishes the following federally enforceable emission limitations for the purpose of limiting the potential to emit (PTE) for PM<sub>10</sub>. The PTE is being restricted such that emission increase for PM<sub>10</sub> allowed for in this permit action (P0106622) will be below the Prevention of Significant Deterioration (PSD) “significant threshold” applicability level of 15 tpy (for PM<sub>10</sub>). The federally enforceable emission limitations are based on the operational restrictions contained in c)(1), which requires control equipment:
  - i. PM<sub>10</sub> emissions shall not exceed 17.96 lbs/day and 3.27 tpy.
- d. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the

December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- e. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the PM<sub>10</sub> emissions from this air contaminant source since the potential to emit is less than ten tons per year, taking into account the use of a baghouse.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the SO<sub>2</sub>, VOC and NO<sub>x</sub> emissions from this air contaminant source since the uncontrolled potential to emit for each is less than ten tons per year.

- f. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size (PM<sub>2.5</sub>) are being implemented through the PM<sub>10</sub> Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that PM<sub>10</sub> is a reasonable surrogate for PM<sub>2.5</sub>, all emissions of PM<sub>10</sub> will be considered PM<sub>2.5</sub>.

c) Operational Restrictions

- (1) The permittee shall operate the baghouse at all times when this emissions unit is in operation.
- (2) The maximum annual aluminum melted in these emissions units, individually, shall not exceed 26,762 tons, based upon a rolling, 12-month summation of the monthly quantities of aluminum melted.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the aluminum usage levels specified in the following table for these emissions units, individually:

Month(s)	Maximum Allowable Cumulative Aluminum Usage (tons)
1	2,680
1-2	5,360
1-3	8,040
1-4	10,720
1-5	13,400
1-6	16,080
1-7	18,760
1-8	21,440
1-9	24,120
1-10	25,013

1-11	25,907
1-12	26,762

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual aluminum usage restriction shall be based upon a rolling, 12-month summation of the monthly quantity of aluminum melted in these emissions units, individually.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for these emissions units individually:
  - a. the amount of aluminum processed, in tons;
  - b. for the first 12 months of operation following the issuance of this permit, the cumulative quantity of aluminum processed, in tons; and
  - c. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly amount of aluminum processed.
- (2) The permittee shall perform weekly\* checks when these emissions units are in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions, excluding water vapor, 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 date and time of the visible emission observation;
  - b. the identification of the stack observed;
  - c. the color of the emissions;
  - d. the total duration of any visible emission observation; and
  - e. the corrective actions, if any, taken to eliminate the visible emissions.

\*once during each normal calendar week.
- (3) The permittee shall maintain records documenting any time periods when these emissions unit were in operation and the baghouses were not operating.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following, for these emissions units individually:
  - a. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative aluminum usage restriction; and
  - b. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month aluminum usage restriction.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions, excluding water vapor, were observed from the stacks serving these emissions units and (b) describe the corrective actions, if any, taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (3) The permittee shall submit deviation (excursion) reports that identify any time periods when these emissions units were in operation and the baghouses were not operating. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

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

a. Emission Limitation:

The amount of aluminum poured shall not exceed 26,762 tons per rolling, 12-month period for these emissions units, individually.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(1).

b. Emission Limitations:

VOC emissions shall not exceed 0.023 lb/ton of aluminum and 0.31 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

If required, compliance with the lb/ton emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with approval of the director. The lb/ton was established based on the AP42 emission factor of 5.5 lb/mmscf and the maximum burner rate of 13.125 mmBtu/hr.

The annual emission limitation was established by multiplying the lb/ton of aluminum emission limitation by the annual aluminum throughput restriction of 26,762 tons per rolling, 12-month period and dividing by 2000 lbs/ton. Therefore, as long as compliance with the lb/ton emission limitation and the annual aluminum throughput restriction is demonstrated, compliance with the annual limitation shall be demonstrated.

c. Emission Limitations:

SO<sub>2</sub> emissions shall not exceed 0.003 lb/ton of aluminum and 0.04 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

If required, compliance with the lb/ton emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with approval of the director. The lb/ton was established based on AP42 emission factor of 0.6 lb/mmscf and the maximum burner rate of 13.125 mmBtu/hr.

The annual emission limitation was established by multiplying the lb/ton of aluminum emission limitation by the annual aluminum throughput restriction of 26,762 tons per rolling, 12-month period and dividing by 2000 lbs/ton. Therefore, as long as compliance with the lb/ton emission limitation and the annual aluminum throughput restriction is demonstrated, compliance with the annual limitation shall be demonstrated.

d. Emission Limitations:

PM<sub>10</sub> shall not exceed 17.96 lbs/day and 3.27 tpy, based on a rolling, 12-month summation of the daily emissions.

Applicable Compliance Method:

If required, compliance with the lb/day emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 201/201A and 202, 40 CFR Part 51, Appendix M to verify the emission rates for melting (0.58 lb/hr), fluxing (1.545 lb/hr) and drossing (3.655 lb/hr). The lb/day represents the potential to emit for this emissions unit based on the additive maximum lb/hr of the following operations and the maximum duration of the operation: melting (0.58 lb PM<sub>10</sub>/hr, 22 hours per day), fluxing (1.545 lbs/hr, 1 hour per day), drossing (3.655 lbs PM<sub>10</sub>/day, 1 hour per day).

The tpy emission limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the daily limitation, compliance shall also be demonstrated with the annual limitation.

e. Emission Limitation:

Visible PE from the bag house stacks shall not exceed 10% opacity.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be demonstrated in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

f. Emission Limitations:

NO<sub>x</sub> emissions shall not exceed 0.430 lb/ton of aluminum and 5.75 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

If required, compliance with the lb/ton emission limitation shall be demonstrated based on the results of the emission testing conducted in accordance with Methods 1-4 and 7 of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director. The lb/ton was established based on AP42 emission factor of 100 lb/mmescf and the maximum burner rate of 13.125 mmBtu/hr.

The annual emission limitation was established by multiplying the lb/ton of aluminum emission limitation by the annual aluminum throughput restriction of 26,762 tons per rolling, 12-month period and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation shall be demonstrated.

g. Emission Limitations:

CO shall not exceed 0.361 lb/ton of aluminum and 4.83 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

If required, compliance with the lb/ton emission limitation shall be demonstrated based on the results of the emission testing conducted in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director. The lb/ton was established based on AP42 emission factor of 84 lb/mmescf and the maximum burner rate of 13.125 mmBtu/hr.

The annual emission limitation was established by multiplying the lb/ton of aluminum emission limitation by the annual aluminum throughput restriction of 26,762 tons per rolling, 12-month period and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the lb/ton emission limitation and the annual aluminum throughput, compliance with the annual limitation shall be demonstrated.

g) Miscellaneous Requirements

(1) None.

**15. Emissions Unit Group - PSand Storage/Assembly: P801, P802, P803, P804,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P801	Precision Sand Mod #1 Core Storage and Assembly Area
P802	Precision Sand Mod #2 Core Storage and Assembly Area
P803	Precision Sand Mod #3 Core Storage and Assembly Area
P804	Precision Sand Mod #4 Core Storage and Assembly Area

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) b)(1)e., b)(1)f. and b)(2)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-10 through 20	<p><u>From each emissions unit individually:</u></p> <p>Volatile organic compound (VOC) emissions shall not exceed 37.51 tons per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 3.27 tpy, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-18-06(E)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
c.	OAC rule 3745-21-07(G)	See b)(2)b.
d.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c.
e.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.
f.	OAC rule 3745-114-01 ORC 3704.03(F)	See B.2 – Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

- a. Based on the "Prevention of Significant Deterioration" (PSD) analysis conducted to ensure the application of "Best Available Control Technology" (BACT), it has been determined that no control technologies for VOC and SO<sub>2</sub> are cost effective.
- b. These emissions units are not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in these emissions units. "Liquid organic material" is defined in OAC rule 3745-21-01.

On February 12, 2008, Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for these emissions units. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirements of OAC rule 3745-21-07(G)(2) still exist as part of the federally-approved SIP of Ohio.

- c. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- d. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the SO<sub>2</sub> emissions from this air contaminant source taking into account the federally enforceable restriction on the amount of sand processed.

c) Operational Restrictions

- (1) The maximum annual sand usage for these emissions units, individually, shall not exceed 114,696 tons, based upon a rolling, 12-month summation of the monthly quantities of sand used.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the sand usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Sand Usage (tons)</u>
1	10,000
1-2	20,000
1-3	30,000
1-4	40,000
1-5	50,000
1-6	60,000
1-7	70,000
1-8	80,000
1-9	90,000
1-10	100,000
1-11	110,000
1-12	114,696

- (2) After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual sand usage restriction shall be based upon a rolling, 12-month summation of the monthly quantity of sand processed.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for these emissions units, individually:
- a. the amount of sand processed, in tons;
  - b. for the first 12 months of operation following the issuance of this permit, the cumulative quantity of and processed, in tons; and
  - c. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly amount of sand processed.

\*The amount of sand processed through this emissions unit is equivalent to the amount of sand received in emissions units P906, P907, P908 and P909. The monitoring and record keeping associated with the sand processed in emissions unit P906, P907, P908 and P909 can be used to fulfill the requirements in this section.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following:

- a. for the first 12 calendar months of operation following the issuance of this permit, the maximum monthly allowable cumulative sand usage restriction; and
- b. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month sand usage restriction.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

- a. Emission Limitation:

The maximum annual sand usage shall not exceed 114,696 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by the record keeping requirements specified in d)(1).

- b. Emission Limitations:

VOC emissions shall not exceed 37.51 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the company-supplied emission factor of 0.654 lb of VOC/ton of sand emission limitation by the annual sand restriction of 114,696 tons and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the VOC emission factor by testing conducted in accordance with Methods 1-4, 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A. Alternative or equivalent methods can be used with the approval of the director.

- c. Emission Limitations:

SO<sub>2</sub> emissions shall not exceed 3.27 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the company-supplied emission factor of 0.057 lb of SO<sub>2</sub> per ton of sand by the annual sand restriction of 114,696 tons and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the SO<sub>2</sub> emission factor by testing conducted in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A. Alternative or equivalent methods can be used with the approval of the director.

g) Miscellaneous Requirements

- (1) None.

**16. Emissions Unit Group - PSand Waste Sand Load-Out: F007, F013,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
F007	Precision Sand Mod #1 & #2 Waste Sand Load-out
F013	Precision Sand Mod #3 & #4 Waste Sand Load-out

- 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) b)(1)g. and b)(2)h.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-10 through 20	Volatile organic compound (VOC) emissions shall not exceed 8.0 tons per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.  See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-08(B)(3)	See b)(2)c.
c.	OAC rule 3745-17-07(B)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a three-minute average.
d.	OAC rule 3745-21-07(G)	None. See b)(2)d.
e.	OAC rule 3745-31-05(D)	Particulate matter less than or equal to 10 microns in size (PM <sub>10</sub> ) shall not exceed 1.40 tpy based upon a rolling, 12-month summation of the monthly emissions.  PE shall not exceed 2.80 tpy based upon a rolling, 12-month summation of the monthly emissions.  See b)(2)e. and b)(2)f.
f.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)g.
g.	OAC rule 3745-31-05(A)(3), as	See b)(2)h.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	effective 12/01/06	

(2) Additional Terms and Conditions

- a. This emissions unit includes the following material handling operations:
  - i. waste sand loading from attrition mill to hopper; and
  - ii. waste sand loading from hopper to truck.
- b. Based on the "Prevention of Significant Deterioration" (PSD) analysis conducted to ensure the application of "Best Available Control Technology" (BACT), it has been determined that no control technologies for VOC were cost effective.
- c. The permittee shall utilize reasonable available control measures (RACM) that are sufficient to minimize or eliminate visible emissions of fugitive dust. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:
  - i. building enclosure; and
  - ii. minimizing the drop height between material transfer points .

Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.

For the other emission points associated with this emissions unit, the permittee maintains that the inherent nature of the operation and material involved is such that compliance with all applicable requirements will be obtained without additional control measures. If at any time the inherent nature of the operation and material involved is not sufficient to meet the above applicable requirements, the permittee shall employ RACM to ensure compliance.

- d. This emissions unit is not subject to the requirements in OAC rule 3745-21-07(G) because no liquid organic material is employed in this emissions unit. "Liquid organic material" is defined in OAC rule 3745-21-01.

On February 18, 2008, Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirements of OAC rule 3745-21-07(G)(2) still exists as part of the federally-approved SIP of Ohio.

- e. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size (PM<sub>2.5</sub>) are being implemented through the PM<sub>10</sub> Surrogate Policy issued by EPA in 1997. For purposes of

demonstrating that PM<sub>10</sub> is a reasonable surrogate for PM<sub>2.5</sub>, all emissions of PM<sub>10</sub> will be considered PM<sub>2.5</sub>.

- f. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) for PE and PM<sub>10</sub>. The PTE is being restricted such that the emission increase for PE and PM<sub>10</sub> allowed for in this permit action (P0106622) will be below the Prevention of Significant Deterioration (PSD) "significant threshold" applicability level of 25 tpy (for PE) and 15 tpy (for PM<sub>10</sub>). The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and RACM required in b)(2)c.:
  - i. PM<sub>10</sub> emissions shall not exceed 1.40 tpy based upon a rolling, 12-month summation of the monthly emissions; and
  - ii. PE shall not exceed 2.80 tpy based upon a rolling, 12-month summation of the monthly emissions.
- g. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by the U.S. EPA.

- h. This paragraph applies once the U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

BAT requirements under OAC rule 374-31-05(A)(3)(a), as effective December 1, 2006, do not apply to VOC, PE and PM<sub>10</sub> emissions from this air contaminant source since the potential to emit for each is less than ten tons per year taking into account the federally enforceable requirements established under OAC rule 3745-31-05(D).

c) Operational Restrictions

- (1) The maximum annual sand processed in these emissions units, individually, shall not exceed 114,696 tons, based upon a rolling, 12-month summation of the monthly sand processed.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the sand processing levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Sand Usage (tons)</u>
1	10,000
1-2	20,000
1-3	30,000
1-4	40,000
1-5	50,000
1-6	60,000
1-7	70,000
1-8	80,000
1-9	90,000
1-10	100,000
1-11	110,000
1-12	114,696

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual sand restriction shall be based upon a rolling, 12-month summation of the monthly sand processed.

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

(2) The permittee shall collect and record the following information each information month for these emissions units:

- a. the quantity of sand processed, in tons;
- b. for the first 12 months of operation following the issuance of this permit, the cumulative quantity of sand processed, in tons; and
- c. after the first 12 months operation following the issuance of this permit, the quantity of sand processed, in tons, based on a rolling, 12-month summation of the monthly sand processed.

\*The amount of sand processed through these emissions unit are equivalent to the amount of sand received in emissions units P906, P907, P908 and P909. The monitoring and record keeping associated with the sand received in emissions units P906, P907, P908 and P909 can be used to fulfill the requirements in this section.

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

- a. the date and time of the visible emission observation;

- b. the identification of the egress observed;
- c. the color of the emissions;
- d. the total duration of any visible emission observation; and
- e. the corrective actions, if any, taken to eliminate the visible emissions.

\*once during each normal calendar week

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following:
  - a. for the first 12 calendar months of operation following the issuance of this permit, the restriction on the maximum allowable cumulative quantity of sand processed; and
  - b. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month restriction on the quantity of sand processed.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous six-month periods.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

The maximum annual amount of sand processed shall not exceed 114,696 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(1).

b. Emission Limitations:

VOC emissions shall not exceed 8.0 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation was established by multiplying a company-supplied emission factor of 0.035 lb VOC/ton, for both sand lead-out and landfill transport, by the annual sand throughput restriction of 114,696 tons per rolling, 12-month period, by 2 (each load out serves two lines) and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the VOC emission factor by testing in accordance with USEPA Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

c. Emission Limitation:

PM<sub>10</sub> emissions shall not exceed 1.40 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the company-supplied emission factor of 0.0043 lb PE/ton (based on AP42, Table 11.19.1-1, 11-95), by 4 (sand handling, transfer and storage to the sand load-out station and to the landfill), by the annual sand throughput restriction of 114,696 tons per rolling, 12-month period, applying 30% control for the building enclosure, by 2 (each load out serves two lines) and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the filterable PM<sub>10</sub> emission factor by testing conducted in accordance with USEPA Method 201/201A and 202 of 40 CFR Part 51, Appendix M or as amended. Alternative or equivalent methods can be used with the approval of the director.

d. Emission Limitation:

PE emissions shall not exceed 2.80 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the company-supplied emission factor of 0.0087 lb PE/ton (based on AP42, Table 11.19.1-1, 11-95), by 4 (sand handling, transfer and storage to the sand load-out station and to the landfill), by the annual sand throughput restriction of 114,696 tons per rolling, 12-month period, applying 30% control for the building enclosure, by 2 (each load out serves two lines) and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the PE emission factor by testing in accordance with USEPA Methods 1-5 of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

e. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60, Appendix A (Standards of Performance for New Stationary Sources) as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03 or as amended. Alternative or equivalent methods can be used with the approval of the director.

g) Miscellaneous Requirements

(1) None.

**17. Emissions Unit Group - PSand Mod#2 Core Machines: P524, P527, P530, P533, P538,**

EU ID	Operations, Property and/or Equipment Description
P524	Precision Sand Mod #2 Core Machine #1
P527	Precision Sand Mod #2 Core Machine #2
P530	Precision Sand Mod #2 Core Machine #3
P533	Precision Sand Mod #2 Core Machine #4
P538	Precision Sand Mod #2 Core Machine #5

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) b)(1)f., b)(2)e. and b)(1)g.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-10 through 20	<p>Volatile organic compound emissions (VOC) from emissions units P524, P527, P530, P533 and P538, combined, shall not exceed 51.61 tons per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.</p> <p><u>Receiving hopper and sand mixer (Stacks PSand3-2 and PSand4-2)</u>            VOC emissions shall not exceed 0.10 pound per ton of sand processed.</p> <p><u>Core making (Stack PSandScr2)</u>            VOC emissions shall not exceed 0.60 pound per ton of sand processed.</p> <p><u>Maintenance (metal cleaning of core machine - Stack PSandScr2):</u>            VOC emissions shall not exceed 0.20 pound per ton of sand processed.</p> <p>Fugitive VOC emissions shall not exceed 2.0 tpy, based on a rolling, 12-month summation of the monthly emissions.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Sulfur dioxide (SO<sub>2</sub>) emissions from emissions unit P524, P527, P530, P533 and P538, combined, shall not exceed 9.18 tpy, based upon a rolling, 12-month summation of the monthly emissions.</p> <p><u>Core making (Stack PSandScr2)</u></p> <p>SO<sub>2</sub> emissions shall not exceed 0.16 pound per ton of sand processed.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(D)	<p>Particulate matter less than or equal to 10 microns in size (PM<sub>10</sub>) from emission units P524, P527, P530, P533 and P538, combined, shall not exceed 2.67 tons per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.</p> <p><u>Receiving hopper and sand mixer (Stacks PSand3-2 and PSand4-2)</u></p> <p>PM<sub>10</sub> shall not exceed 0.0182 lb/ton of sand processed.</p> <p><u>Core making (Stack PSandScr2)</u></p> <p>PM<sub>10</sub> shall not exceed 0.028 lb/ton of sand processed.</p> <p>Visible PE from the stacks serving this emissions unit shall not exceed 10% opacity, as a six-minute average.</p> <p>See b)(2)b. b)(2)c. and b)(2)g.</p>
c.	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B) OAC rule 3745-18-06(E)	The emission limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(D).
d.	OAC rule 3745-21-07(G)	Exempt, pursuant to OAC rule 3745-21-07(G)(9)(i). See b)(2)f.
e.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)d.
f.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)e.
g.	OAC rule 3745-114-01 ORC 3704.03(F)	See B.2 – Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control technology (BACT) on this emissions unit for VOC and SO<sub>2</sub>. BACT has been determined to be the use of the following:
- i. sand mixing - no control technologies were cost effective.
  - ii. core making - a packed tower wet scrubber. The wet scrubber shall achieve the following control efficiencies:
    - (a) dimethyl isopropyl amine (DMIPA) as catalyst: 99% for the DMIPA; and
    - (b) SO<sub>2</sub> as catalyst: 99.0% for SO<sub>2</sub>.
- b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) for PM<sub>10</sub>. The PTE is being restricted such that the emission increase for PM<sub>10</sub> allowed for in this permit action (P0106622) will be below the Prevention of Significant Deterioration (PSD) "significant threshold" applicability level of 15 tpy (for PM<sub>10</sub>). The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2), which require control equipment and process control:
- i. PM<sub>10</sub> emissions shall not exceed:
    - (a) 0.0182 lb/ton of sand (receiving hopper and sand mixer),
    - (b) 0.028 lb/ton of sand (core making); and
    - (c) 2.67 tpy, based upon a rolling, 12-month summation of the monthly emissions.
  - c. All emissions of particulate matter are PM<sub>10</sub>.
  - d. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- e. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of VOC and SO<sub>2</sub> from this air contaminant source since the potential to emit for each is less than ten tons per year, taking into account the federally enforceable restriction on the amount of sand processed and the use of a wet scrubber.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of PM<sub>10</sub> from this air contaminant source since the potential to emit is less than ten tons per year, taking into account the federally enforceable restriction on the amount of sand processed, the use of a baghouse and cyclone.

- f. On February 18, 2008, Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirements of OAC rule 3745-21-07(G)(2) still exists as part of the federally-approved SIP of Ohio.

- g. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size (PM<sub>2.5</sub>) are being implemented through the PM<sub>10</sub> Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that PM<sub>10</sub> is a reasonable surrogate for PM<sub>2.5</sub>, all emissions of PM<sub>10</sub> will be considered PM<sub>2.5</sub>.

c) Operational Restrictions

- (1) The maximum annual sand processed in emission units P524, P527, P530, P533 and P538, combined, shall not exceed 114,696 tons, based upon a rolling, 12-month summation of sand processed.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the sand processing levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Sand Usage (tons)</u>
1	10,000
1-2	20,000
1-3	30,000
1-4	40,000
1-5	50,000

1-6	60,000
1-7	70,000
1-8	80,000
1-9	90,000
1-10	100,000
1-11	110,000
1-12	114,696

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual sand restriction shall be, based upon a rolling, 12-month summation of the monthly sand processed.

- (2) The permittee shall operate the baghouse at all times when any of the emissions units is in operation.

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

- (1) The permittee shall collect and record the following information each month for emissions units P524, P527, P530, P533 and P538, combined:

- a. the quantity of sand processed, in tons;
- b. for the first 12 months of operation following the issuance of this permit, the monthly cumulative quantity of sand processed, in tons; and
- c. after the first 12 months operation, the quantity of sand processed, in tons, based on a rolling, 12-month summation of the monthly sand processed.

\*The amount of sand processed through this emissions unit is equivalent to the amount of sand received in emissions units P906, P907, P908 and P909. The monitoring and record keeping associated with the sand received in emissions unit P906 can be used to fulfill the requirements in this section.

- (2) The permittee shall properly operate and maintain equipment to continuously monitor the liquor pH and the scrubber liquor flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. the catalyst gas scrubber liquor pH, on a once-per-shift basis;
- b. the catalyst gas scrubber liquor flow rate, in gallons per minute, on a once-per-shift basis; and
- c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

Whenever the monitored values for the catalyst gas scrubber liquor pH and catalyst gas scrubber liquor flow rate deviate from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable ranges 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 catalyst gas scrubber liquor pH and catalyst gas scrubber liquor flow rate 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.

- d. The catalyst gas scrubber, utilizing the DMIPA, catalyst, recirculating liquor pH shall be continuously maintained at a value of less than or equal to 5 at all times while the emissions unit is in operation, or as established during the most recent performance test that demonstrated the emissions unit was in compliance. The caustic catalyst gas scrubber, utilizing the SO<sub>2</sub> catalyst, recirculating liquor pH shall be continuously maintained at a value of greater than or equal to 9 at all times while the emissions unit is in operation, or as established during the most recent performance test that demonstrated the emissions unit was in compliance.
- e. The catalyst gas scrubber liquor flow rate shall be continuously maintained at a value of not less than 3 gallons per minute per 1,000 cfm of gas flow at all times while the emissions unit is in operation, or as established during the most recent performance test that demonstrated the emissions unit was in compliance.

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

- (3) The permittee shall maintain records documenting any time periods when any of the emissions units was in operation and the baghouse was not operating.
- (4) The permittee shall perform weekly\* checks when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse and from the cyclone serving this emissions unit. The presence or absence of

any visible emissions, excluding water vapor, 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 date and time of the visible emission observation;
- b. the identification of the stack observed;
- c. the color of the emissions;
- d. the total duration of any visible emission observation; and
- e. the corrective actions, if any, taken to eliminate the visible emissions.

\*once during each normal calendar week

(5) The permittee shall collect and record the following information on a monthly basis for the metal cleaner applied in this emissions unit:

- a. the name and identification of each metal cleaner employed;
- b. the VOC content of each metal cleaner, in pounds per gallon;
- c. the number of gallons of each metal cleaner employed;
- d. the total VOC emission rate from all metal cleaners, i.e., the summation of the products of "d)(5)b." times "d)(5)c." for all metal cleaners employed, in pounds; and
- e. the pound per ton of VOC emissions from all metal cleaners employed [d)(5)d./d)(1)a].

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports, which identify all exceedances of the following:

- a. for the first 12 calendar months of operation following the issuance of this permit, the restriction on the maximum allowable cumulative quantity of sand processed; and
- b. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month restriction on the quantity of sand processed.

These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

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

- a. any time periods when the emissions unit was in operation and the baghouse(s) was not operating; and

- b. any exceedance of the 0.20 lb VOC/ton of sand emission limitation for the metal cleaner.

Each report shall be submitted within 30 days after the deviation occurs.

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the wet scrubber during the operation of the emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the liquid flow rate or the liquid pH was outside of the appropriate range or limit specified by the manufacturer and outside of the acceptable range for each parameter following any required compliance demonstration;
  - b. an identification of each incident of deviation described in (3)a. where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (3)a. where prompt corrective action, that would bring the liquid flow rate or scrubber liquid pH into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (3)a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

- (4) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions, excluding water vapor, were observed from the baghouse and from the cyclone serving this emissions unit and (b) describe the corrective actions, if any, taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (5) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for all four (4) precision sand modules in accordance with the following requirements:

- a. The emissions testing shall be conducted over four (4) consecutive years, beginning no later than 180 days after achieving the maximum production rate at which Psand module 1 (emissions units P464, P465, P466, P467, P468, P469) or Psand module 2 (emissions units P524, P527, P530, P533, P538) or Psand module 3 (emissions units P525, P528, P531, P534, P536, P539) or Psand module 4 (emissions units P526, P529, P532, P535, P537, P540), will be operated, whichever comes first. The permittee shall test a minimum of one module per year.
- b. The emission testing shall be conducted to demonstrate compliance with the following emission limitations involving DMIPA as the catalyst:
  - i. 0.60 lb of VOC per ton of sand, for core making.
- c. When the emission unit first utilizes SO<sub>2</sub> as the catalyst for purposes other than research and development, the permittee shall conduct testing within 60 days after the initial use of SO<sub>2</sub> to demonstrate compliance with the following emission limitations when utilizing SO<sub>2</sub> as the catalyst:
  - i. 0.16 lb of SO<sub>2</sub> per ton of sand, for core making; and
  - ii. The control efficiency for SO<sub>2</sub>.
- d. The following test methods shall be employed to demonstrate compliance with the above emission limitations:
  - i. for total VOC, Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 18, 25, or 25A (as applicable) of 40 CFR Part 60, Appendix A for determining total VOC mass emissions.
  - ii. for SO<sub>2</sub>, Methods 1-4 and 6 of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 6 of 40 CFR Part 60, Appendix A for determining SO<sub>2</sub> mass emissions.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO. The test method(s) which must be employed to demonstrate compliance with the control efficiencies are specified below.
- e. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."
- f. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions

unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

- g. During emission testing, the permittee shall also record the following information:
  - i. the pH range for the scrubbing liquid;
  - ii. the scrubber water flow rate, in gallons/minute; and
  - iii. the catalyst and resin used to make the cores.
- h. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, NWDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, NWDO 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 of the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

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

- a. Emission Limitation:

The maximum annual amount of sand processed for P524, P527, P530, P533 and P538, combined shall not exceed 114,696 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in d)(1).

- b. Emission Limitations:

0.60 lb of VOC per ton of sand (core making)

Applicable Compliance Method:

Compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

c. Emission Limitations:

0.10 lb of VOC per ton of sand (hopper and mixing)

Applicable Compliance Method:

The lb/ton emission limitation was established based on the Casting Emission Reduction Program (CERP) report #1409-123-EQ (Technikon), published 12/09/02, revised 5/06.

If required, compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

d. Emission Limitation:

0.20 lb of VOC per ton of sand (metal cleaning).

Applicable Compliance Method:

The lb/ton emission limitation was established based on the use of five 55 gallon drums of metal cleaner per month with a VOC content of 8.1 lbs per gallon with 85% captured by the scrubber [scrubber does not provide control during metal cleaning] and the use of 114,696 tons per year of sand. Compliance shall be demonstrated based on the record keeping requirements specified in d)(5).

If required, compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

e. Emission Limitations:

PM<sub>10</sub> emissions shall not exceed 0.0182 lb/ton of sand (hopper and mixing)

Filterable PM<sub>10</sub> emissions shall not exceed 0.028 lb/ton of sand (core making)

Applicable Compliance Method:

If required, compliance with the company-established emission factors shall be demonstrated based on the results of emission testing conducted in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M or as amended. Alternative or equivalent methods can be used with the approval of the director.

f. Emission Limitation:

VOC emissions from emission units P524, P527, P530, P533 and P538, combined shall not exceed 51.61 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation was established by adding the VOC emissions from hopper and mixing, core making, and metal cleaning. VOC emission from hopper and mixing, core making, and metal cleaning were established by multiplying the respective VOC emission limitations of 0.10 lb/ton, 0.60 lb/ton, and 0.20 lb/ton by the annual sand throughput restriction of 114,696 tons per rolling, 12-month period and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the lb/ton emission limitations and the annual sand throughput, compliance with the annual limitation shall also be demonstrated.

g. Emission Limitation:

Fugitive VOC emissions shall not exceed 2.0 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The emission limitation was established by multiplying the company-supplied emission factors of 0.035 lb of VOC per ton of sand by the annual sand restriction of 114,696 tons and dividing by 2000 lbs/ton.

h. Emission Limitation:

PM<sub>10</sub> emissions P524, P527, P530, P533 and P538, combined shall not exceed 2.67 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation was established by adding the PM<sub>10</sub> emissions from hopper/mixing, and core making. PM<sub>10</sub> emissions from hopper/mixing, and core making were established by multiplying the respective PM<sub>10</sub> emission limitations of 0.0182 lb/ton and 0.028 lb/ton by the annual sand throughput restriction of 114,696 tons per rolling, 12-month period and dividing by 2000 lbs/ton. Therefore as long as compliance with the annual sand throughput restriction is demonstrated by the record keeping requirements specified in d)(1), compliance with the annual limitation shall also be demonstrated.

i. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 9.18 tpy, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the lb/ton of sand emission limitation by the annual sand restriction of 114,696 tons and dividing by 2000 lbs/ton. Therefore provided compliance is shown with the lb/ton emission limitation and the annual sand throughput, compliance with the annual limitation shall be demonstrated.

j. Emission Limitation:

SO<sub>2</sub> shall not exceed 0.16 lb/ton of sand (core making)

Applicable Compliance Method:

Compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A or as amended. Alternative or equivalent methods can be used with the approval of the director.

k. Emission Limitation:

Visible PE from the stack(s) serving this emissions unit shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources" or as amended. Alternative or equivalent methods can be used with the approval of the director.

g) Miscellaneous Requirements

(1) None.