



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

6/30/2011

Certified Mail

Renee Olney
Liberty Casting Co
550 Liberty Rd
Delaware, OH 43015

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0121010003
Permit Number: P0105263
Permit Type: Administrative Modification
County: Delaware

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Delaware Gazette. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 -Via E-Mail Notification
Ohio EPA-CDO



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. **Source Description:** August 4, 2009, Liberty Casting Co., a grey iron foundry, submitted an application for an Administrative Modification to PTI 01-12033 to incorporate a new volatile organic compound (VOC) emission factor for emission source P038, a thermal sand reclamation unit, and to correct an emission factor applied to the Vibramill Shakeouts (P060, P061, P062, and P063). The results of applying these new factors will also be incorporated into the netting analysis performed for emission sources P038 and P055-P063. Details are explained below.

The thermal sand reclamation unit, P038, was originally permitted under PTI 01-01287 with a VOC emission factor taking into account only VOCs from fuel combustion resulting in an allowable emission rate of 0.02 pounds per hour (lb/hr), which equates to 0.10 tons per year. Recently, however, it was determined that VOCs from this source are much higher than previously known. A Method 25 stack test performed on May 21, 2009 showed that VOC emissions from this source are significantly higher, with an average mass emissions rate during the test of 2.77 pounds per hour, which equates (at 8760 hours per year) to 12.13 tons per year. This higher emission rate is believed to be caused by the dryer driving off the VOCs from the binder used in the sand. This newly determined emission rate, along with a 20% factor to allow for variations in the process, was incorporated into a revised permit, PTI P0105287 issued March 15, 2011. This new emission factor will also be applied to the netting analysis which was performed for emissions units P038 and P055-P063 for PTI 01-12033.

In addition, Vibramill Shakeouts LRVM 1-4 (P060-P063, respectively) were permitted under PTI 01-12033 with a VOC emission factor of 1.2 lbs VOC per ton of *sand* (SCC 3-04-003-50); however, according to the facility, the correct emission factor should be 1.2 lbs VOC per ton of *iron* (SCC 3-04-003-31). The facility believes that this lower emission factor is more representative of the actual level of VOC emissions being emitted from these sources and will test, at a minimum, a representative unit to confirm. The application of this new emission factor will reduce allowable VOC emissions from 87.7 tons per year to 18 tons per year. Therefore, at the facility's request, this new allowable emissions limit will be incorporated into this permit as well as the netting analysis which was performed for emissions units P038 and P055-P063 for PTI 01-12033. In addition, the synthetic minor monitoring and record keeping were updated to incorporate the existing facility-wide limitation on metal melted (established in PTI 01-6432, but 12-month rolling for these units in this PTI) and monthly recordkeeping of the metal melted.

3. **Facility Emissions and Attainment Status:** The facility is a Title V facility with synthetic minor limitations on PM-10 and VOC for the purpose of avoiding New Source Review. Delaware County is in attainment for all pollutants with the exception of PM 2.5.



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0105263
Facility ID: 0121010003

4. Source Emissions:

P038: Thermal sand reclamation unit

Assumptions:

PTE throughput: = 3.0 tons of sand per/hr
 = 26,280 tons of sand/yr
 = 0.003 MMft³ natural gas/hr

VOC Emission factor = 2.77 lb VOC/hr per stack test performed on May 21, 2009
 (2.77 lb VOC/hr) x (1.20)_{safety factor} = 3.32 lb VOC/hr

Potential to Emit: = (3.32 lb VOC/hr) x (8760 hr/yr) x (1 ton/2000 lbs) = 14.56 tons VOC/yr

P060: Vibramill Shakeout No. 1 (LRVM 1)

P061: Vibramill Shakeout No. 1 (LRVM 2)

P062: Vibramill Shakeout No. 1 (LRVM 3)

P063: Vibramill Shakeout No. 1 (LRVM 4)

Assumptions:

Max potential: = 146,333 tons sand per rolling 12-month summation (synthetic minor limitation)
 = 30,000 tons of metal melted per 365 day rolling summation (facility-wide limitation, PTI 01-6432)
 = 15 tons of metal per hour max hourly process rate (maximum hourly melt rate from previous application)

Emission factor: = 1.2 lbs VOC/ton iron (FIRE6.25, 12/05, SCC 3-04-003-31)

Potential to Emit (PTE): = 30,000 tons metal/yr x 1.2 lbs VOC/ton x ton/2000 lbs = 18 tons VOC/yr

Hourly PTE = 15 tons metal/hr x 1.2 lbs VOC/ton = 18 lbs/hr

5. Please provide additional notes or comments as necessary:

References to OAC rule 3745-17-07(B)(1), 3745-17-08(B), and 3745-21-07(G) and their corresponding terms and conditions were removed from the permit with this revision since they were all negative declarations (i.e. each stated that the referenced rule did not apply).

Netting analysis – The purpose of the netting analysis included in the Permit Strategy Write-Up for 01-12033 was to determine if the permitting action proposed under 01-12033 (replacement of sand reclamation system and shakeout table), PTI 01-01350 (installation of new flow coat core wash station) and 01-01344 (installation of a sand mixer), constituted a Major Modification as defined by OAC rule 3745-31-01(III). The analysis is being included below in the this Permit Strategy Write-Up (PSW) as it was included in the PSW for 01-12033 with the corrections to the emission factors for emission units P038 and P060-P063 and subsequent associated calculation corrections in bold underline.



Step 1: Calculate the sum of the difference between the potential to emit from each new emissions unit following completion of the NSR project and the baseline actual emissions of these units before the NSR project. [OAC rule 3745-31-01(III)(4)(b)].

**Table I:
 New Emissions Units
 Potential to emit minus baseline actual*
 (for this project within the past 12 months)**

Emission Unit (EU) ID	EU Description	PTE Completion Difference (tpy)
P038	Thermal sand reclaim unit	<u>14.56</u>
P055	5.5 tons/hr electric induction furnace (LRFU3)	-
P056	Large Chromite Sand Mixer (LRMX5)	61.5
P057	Large Chromite Area flow coat core wash station	22.0
P058	Sand Reclamation System (LRRC1)	-
P059	Sand Reclamation System (LRRC2)	-
P060	Vibramill Shakeout (LRVM1)	<u>18</u>
P061	Vibramill Shakeout (LRVM2)	-
P062	Vibramill Shakeout (LRVM3)	-
P063	Vibramill Shakeout (LRVM4)	-
Total emissions increases for new or modified emissions units (project as defined within the past 12 months), tons		<u>116.06</u>

If the values are greater than the significance level for the pollutants in question, then a significant emissions increase has occurred. (Based upon Table II, a Significant Modification will occur.)

**Table II:
 Summary Table**

		VOC
New Emissions Units		<u>116.06</u>
Trigger Level		40
Significant Emissions Increase?		Yes

Step 2: Calculate whether a net emissions increase will occur.

With respect to any regulated NSR pollutant emitted by a major stationary source, the amount by which the sum of (1) an increase in emissions; and (2) contemporaneous increases/decreases, exceeds zero.[OAC rule 3745-31-01 (SSS)].



**Table III:
Contemporaneous Increases/Decreases
And Shutdowns during 5 year period.**

EU ID	EU Description	2-yr Average Actual	Projected Actual	Difference (tpy)
P013	Shakeout Table <i>Shutdown in 01/06</i> <i>2 yavg (2004 & 2005)</i>	36.9	-	36.9
P030	Sand Reclamation System <i>Shutdown in 01/06</i> <i>2 yavg (2004 & 2005)</i>	-	-	-
P031	Furnace <i>Shutdown in 06/02</i> <i>2 yavg (1998 & 1999)</i>	-	-	-
P027	Furnace 1 & 2 <i>Shutdown in 02/06</i> <i>2 yavg (2004 & 2005)</i>	-	-	-
P045	Large Core Room Sand Mixer (LRMX6) <i>Shutdown in 11/02</i> <i>2 yavg (1998 & 1999)</i>	1.8	-	1.8
P048-P053	Combined Flow Coat Mold/Core Wash Station <i>2 yavg (2004 & 2005)</i>	39.4	19.2	20.2
Total net increases/decreases		78.1	19.2	58.9

**Table IV
Summary Table –
Sum of Table II and III**

	VOC
Significant Emissions Increase	<u>116.06</u>
Contemporaneous Increases/Decreases	-58.9
Total Significant Net Emissions Increase	<u>57.16</u>
Trigger Levels	40
Significant Net Emissions Increase?	Yes

Therefore this project still resulted in a major modification because the NSR project caused a significant emissions increase and a significant net emissions increase even with the updated and corrected emission factors. The permittee proposed to accept synthetic minor limits for this project to avoid a major modification.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0105263
Facility ID: 0121010003

**Table V
Synthetic Minor Limitations***

EU ID	EU Description	Permit No.	VOC	
			Pre	Post
P038	Thermal sand reclaim unit	01-01287	<u>14.56</u>	<u>14.56</u>
P055	5.5 tons/hr electric induction furnace (LRFU3)	01-01288	-	-
P056	Large Chromite Sand Mixer (LRMX5)	01-01344	61.5	5.0
P057	Large Chromite Area flow coat core wash station	01-01350	22.0	5.9
P058	Sand Reclamation System (LRRC1)	01-12033	-	-
P059	Sand Reclamation System (LRRC2)	01-12033	-	-
P060	Vibramill Shakeout (LRVM1)	01-12033	<u>18</u>	<u>18</u>
P061	Vibramill Shakeout (LRVM2)	01-12033	-	-
P062	Vibramill Shakeout (LRVM3)	01-12033	-	-
P063	Vibramill Shakeout (LRVM4)	01-12033	-	-
Total Synthetic Minor Limitations			-	<u>43.46</u>
Contemporaneous Increases/Decreases			-	-58.9
Total Increases			-	<u>-15.44</u>
Trigger Levels			-	40
Significant Net Emissions Increase AFTER Synthetic Minor Restrictions			-	No

**Table VI
Summary Table –
Final Determination**

	VOC
Total Permitting Action without Synthetic Minor	<u>116.06</u>
Total Permitting Action with Synthetic Minor	<u>43.46</u>
Total Significant Net Emissions Increase with Synthetic Minor	<u>-15.44</u>
Significance Levels	40
Significant Increase from Permitting Action	No

Therefore, this project did not result in a major modification because the NSR project, with the synthetic minor restrictions as proposed, did not cause a significant emissions increase.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0105263
Facility ID: 0121010003

6. Conclusion: Issuance of PTI P0105263 is recommended.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Allowable Emissions (tpy)
PM	18.2
PM10	2.8
VOC	18.0

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Liberty Casting Co

Issue Date: 6/30/2011

Permit Number: P0105263

Permit Type: Administrative Modification

Permit Description: This permit is an Administrative Modification to PTI 01-12033 to incorporate a new volatile organic compound (VOC) emission factor that was determined from recent source testing for emission source P038, a thermal sand reclamation unit, and to apply a different emission factor, by request of the Permittee, to the Vibramill Shakeouts (P060, P061, P062, and P063), to be verified with upcoming source specific stack testing. The results of applying these new factors were incorporated into the netting analysis previously performed for emission sources P038 and P055-P063 and the synthetic minor limitation (to avoid NSR) for emission units P060-P063.

Facility ID: 0121010003

Facility Location: Liberty Casting Co
550 Liberty Rd,
Delaware, OH 43015

Facility Description: Iron Foundries

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Stephanie Habinak at Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049 or (614)728-3778. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Liberty Casting Co

Facility ID:	0121010003
Permit Number:	P0105263
Permit Type:	Administrative Modification
Issued:	6/30/2011
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Liberty Casting Co

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Authorization

Facility ID: 0121010003

Facility Description: Gray iron foundry located at 550 South Liberty Road, Delaware, Ohio.

Application Number(s): M0000531

Permit Number: P0105263

Permit Description: This permit is an Administrative Modification to PTI 01-12033 to incorporate a new volatile organic compound (VOC) emission factor that was determined from recent source testing for emission source P038, a thermal sand reclamation unit, and to apply a different emission factor, by request of the Permittee, to the Vibramill Shakeouts (P060, P061, P062, and P063), to be verified with upcoming source specific stack testing. The results of applying these new factors were incorporated into the netting analysis previously performed for emission sources P038 and P055-P063 and the synthetic minor limitation (to avoid NSR) for emission units P060-P063.

Permit Type: Administrative Modification

Permit Fee: \$1,500.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 6/30/2011

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Liberty Casting Co
550 Liberty Rd
Delaware, OH 43015

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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0105263

Permit Description: This permit is an Administrative Modification to PTI 01-12033 to incorporate a new volatile organic compound (VOC) emission factor that was determined from recent source testing for emission source P038, a thermal sand reclamation unit, and to apply a different emission factor, by request of the Permittee, to the Vibramill Shakeouts (P060, P061, P062, and P063), to be verified with upcoming source specific stack testing. The results of applying these new factors were incorporated into the netting analysis previously performed for emission sources P038 and P055-P063 and the synthetic minor limitation (to avoid NSR) for emission units P060-P063.

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

Group Name: Vibramill Shakeouts

Table with 2 columns: Emissions Unit ID and details (Company Equipment ID, Superseded Permit Number, General Permit Category and Type). Rows include units P060, P061, P062, and P063.

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, Central 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, Central 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, Central 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, Central 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, Central 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, Central 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, Central 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).

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- 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

Draft Permit-to-Install

Liberty Casting Co

Permit Number: P0105263

Facility ID: 0121010003

Effective Date: To be entered upon final issuance

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

C. Emissions Unit Terms and Conditions

Effective Date: To be entered upon final issuance

1. Emissions Unit Group -Vibramill Shakeouts: P060, P061, P062, P063,

EU ID	Operations, Property and/or Equipment Description
P060	Vibramill Shakeout No.1 (LRVM 1) controlled by baghouse LRDC 2
P061	Vibramill Shakeout No.2 (LRVM 2) controlled by baghouse LRDC 1
P062	Vibramill Shakeout No.3 (LRVM 3) controlled by baghouse LRDC 1
P063	Vibramill Shakeout No.4 (LRVM 4) controlled by baghouse LRDC 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) 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 3745-31-05(A)(3)	<p>The baghouse serving emissions units P059, P060 and P063 shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases.</p> <p>There shall be no visible particulate emissions from the stack serving emissions units P059, P060 and P063.</p> <p>Visible emissions of fugitive dust shall not exceed 10 percent opacity, as a 3-minute average from any non-stack egress point.</p> <p>Stack and fugitive emissions from each emissions unit shall not exceed:</p> <p>3.73 pounds particulate emissions (PE) per hour (lbs/hr);</p> <p>0.56 lb particulate matter less than 10 microns in diameter (PM10)/hr; and</p> <p>18 lbs volatile organic compounds volatile organic compounds (VOC) /hr.</p>

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule shall also include compliance with the requirements of OAC 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid non-attainment provisions)	See Section b)(2)b. and c)(1) below.
c.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to the requirement specified in OAC rule 3745-31-05 (A)(3).

(2) Additional Terms and Conditions

- a. The 3.73 pounds PE per hour, 0.56 pounds PM10 per hour and 18 pounds VOC per hour emission limitations were written to reflect the potential to emit of each emissions unit (P060: Vibramill Shakeout No.1 (LRVM 1), P061: Vibramill Shakeout No.2 (LRVM 2), P062: Vibramill Shakeout No.3 (LRVM 3), and P063: Vibramill Shakeout No.4 (LRVM 4)) as vented to the baghouses. Therefore, additional monitoring, record keeping, and reporting requirements are not necessary to demonstrate compliance with these emission limitations.
- b. PE emissions shall not exceed 18.2 tons per rolling, 12-month period and PM10 emissions shall not exceed 2.8 tons per rolling, 12-month period, and VOC emissions shall not exceed 18 tons per rolling, 12-month period from emissions units P058: Sand Reclamation System (LRRC 1), P059: Sand Reclamation System, P060: Vibramill Shakeout No.1 (LRVM 1), P061: Vibramill Shakeout No.2 (LRVM 2), P062: Vibramill Shakeout No.3 (LRVM 3), and P063: Vibramill Shakeout No.4 (LRVM 4) combined.

c) Operational Restrictions

- (1) The maximum amount of sand processed by emissions units P058: Sand Reclamation System (LRRC 1), P059: Sand Reclamation System, P060: Vibramill Shakeout No.1 (LRVM 1), P061: Vibramill Shakeout No.2 (LRVM 2), P062: Vibramill Shakeout No.3 (LRVM 3), and P063: Vibramill Shakeout No.4 (LRVM 4), combined, shall not exceed 146,333 tons per rolling, 12-month summation.

Since this is an existing operation, there are existing records of sand processed and therefore the amount of sand processed during the first 12 months does not need to be established.

- (2) The maximum amount of iron processed (metal melted) by the facility shall not exceed 30,000 tons per rolling, 12-month summation (facility-wide limitation contained in PTI 01-6432).

Since this is an existing operation, there are existing records of iron processed (metal melted) and therefore the amount of metal melted during the first 12 months does not need to be established.

- (3) The pressure drop across the each of the baghouses (LRDC 1 and LRDC2) shall be maintained within the range of 2 to 8 inches of water while the emissions unit(s) is/are in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions units P058: Sand Reclamation System (LRRC 1), P059: Sand Reclamation System, P060: Vibramill Shakeout No.1 (LRVM 1), P061: Vibramill Shakeout No.2 (LRVM 2), P062: Vibramill Shakeout No.3 (LRVM 3), and P063: Vibramill Shakeout No.4 (LRVM 4), combined:
 - a. the amount of sand processed, in tons;
 - b. the amount of iron processed (metal melted), in tons;
 - c. the rolling, 12-month summation of sand processed, in tons;
 - d. the rolling, 12-month summation of the iron processed, in tons; and
 - e. the rolling, 12-month PE, PM10 and VOC emissions rate, in tons, calculated by summing the stack and fugitive emissions.

Stack emissions can be determined by multiplying the amount of sand processed (c) by 3.6 lbs PE/ton (AP-42, 12.10-7, 01/95) or 0.54 lbs PM10/ton (Fire6.25, 30400350, 12/05) by amount captured (1.0-0.05) by control efficiency of (1.0-0.98) or as demonstrated during a recent stack test, and dividing by 2000 lbs/ton. Fugitive emissions can be determined by multiplying the amount of sand processed (b) by 3.6 lbs PE/ton or 0.54 lbs PM10/ton by amount not captured (1.0-0.95) and dividing by 2000 lbs/ton. The summed PE and PM10 emissions are then doubled because all sand is sent through one of the Vibramill Shakeout operations (P060-P063) followed by one of the Sand Reclamation Systems (P058-P059). VOC emissions shall be determined by multiplying the amount of iron processed (d) by 1.2 lbs VOC/ton (Fire6.25, 12/05, SCC 30400331) and dividing by 2000 lbs/ton until such time that any required performance testing in Section f) is conducted and an emission unit-specific emission factor is established to demonstrate compliance with the emissions limit in b)(1).

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress 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 color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
- (3) The permittee shall perform daily checks, when the emissions unit(s) is/are in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
- (4) The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse(s) while the emissions unit(s) is/are in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouses on a daily basis.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, sand processing rate limitation, PE, PM10 and VOC emission rate limitations from emissions units P058: Sand Reclamation System (LRRC 1), P059: Sand Reclamation System, P060: Vibramill Shakeout No.1 (LRVM 1), P061: Vibramill Shakeout No.2 (LRVM 2), P062: Vibramill Shakeout No.3 (LRVM 3), and P063: Vibramill Shakeout No.4 (LRVM 4), combined. These reports shall be submitted to the Ohio EPA, Central District Office, in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
 - (2) The permittee shall submit quarterly 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 Ohio EPA, Central District Office, in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
 - (3) The permittee shall submit quarterly written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate

emissions. These reports shall be submitted to the Ohio EPA, Central District Office, in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

- (4) The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse(s) did not comply with the allowable range specified above.
- (5) The permittee shall also submit annual reports that specify the total PE, PM10 and VOC emissions from P058, P059, P060, P061, P062 and P063, combined. The reports shall be submitted by April 15th of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for these emissions units in the annual Fee Emission Report.

f) Testing Requirements

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

a. Emission Limitation:

The baghouse serving emissions units P059, P060 and P063 shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Compliance shall be demonstrated based upon stack testing requirements specified in section f(2) below.

b. Emission Limitation:

There shall be no visible particulate emissions from the stacks serving these emissions units.

Applicable Compliance Method:

If required, compliance with the visible emission limitation for this emissions unit shall be determined in accordance with Test Method 9 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, 1997.

c. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 10 percent opacity, as a 3-minute average from any non-stack egress point.

Applicable Compliance Method:

If required, compliance with the visible emission limitation for this emissions unit shall be determined in accordance with Test Method 22 set forth in "Appendix on

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Test methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1997.

d. Emission Limitation:

PE shall not exceed 3.73 lbs/hr .

Applicable Compliance Method:

Compliance may be demonstrated by summing the stack and fugitive emissions.

Stack emissions can be determined by multiplying the maximum amount of sand processed, 15 tons/hr, by 3.6 lbs PE/ton (AP-42, 12.10-7, 01/95) by amount captured (1.0-0.05) by control efficiency of (1.0-0.98) or as demonstrated during a recent stack test. Fugitive emissions can be determined by multiplying the amount of sand processed, 15 tons/hr, by 3.6 lbs PE/ton by amount not captured (1.0-0.95).

e. Emission Limitation:

PM10 shall not exceed 0.56 lb/hr.

Applicable Compliance Method:

Compliance may be demonstrated by summing the stack and fugitive emissions.

Stack emissions can be determined by multiplying the maximum amount of sand processed, 15 tons/hr, by 0.54 lbs PM10/ton (Fire6.25, 30400350, 12/05) by amount captured (1.0-0.05) by control efficiency of (1.0-0.98) or as demonstrated during a recent stack test. Fugitive emissions can be determined by multiplying the amount of sand processed, 15 tons/hr, by 0.54 lbs by amount not captured (1.0-0.95).

f. Emission Limitation:

VOC shall not exceed 18 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirements in f)(2)(ii) below and the recordkeeping in d)(1) above.

Emissions may be determined by multiplying the amount of iron processed (metal melted) per hour by 1.2 lbs VOC per ton of iron (Fire6.25, 12/05, SCC 30400331) and dividing by 2000 lbs/ton until such time that the stack test requirement in f)(2)(ii) below is fulfilled and an emission unit specific emission factor is determined and applied.

g. Emission Limitation:

PE emissions shall not exceed 18.2 tons per rolling, 12-month period, PM10 emissions shall not exceed 2.8 tons per rolling, 12-month period, and VOC emissions shall not exceed 18 tons per rolling, 12-month period from emissions units P058: Sand Reclamation System (LRRC 1), P059: Sand Reclamation System, P060: Vibramill Shakeout No.1 (LRVM 1), P061: Vibramill Shakeout No.2 (LRVM 2), P062: Vibramill Shakeout No.3 (LRVM 3), and P063: Vibramill Shakeout No.4 (LRVM 4), combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirements in b)(2) below and the recordkeeping in d)(1) above.

- (2) The permittee shall conduct, or have conducted, emission testing for these emissions units in accordance with the following requirements:
- a. The emission testing shall be conducted within 180 days of permit issuance.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rate limitation of 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases, and to determine the baghouse control efficiency.
 - c. The emission testing shall be conducted to determine demonstrate compliance with the allowable emission limitation of 18 lbs/hr and to determine an emission unit specific VOC emission factor.
 - d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
 - i. Particulates: Method 5 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The control efficiency shall be determined by the percent reduction in mass emissions between the inlet and outlet of the control system.
 - ii. VOC: Method 25 or 25A for total VOC; 18 or 320 for speciated compounds (if necessary) 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - e. The test(s) shall be conducted while the emissions units vented to the baghouse are operating at or near maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating

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parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

- (1) None.