

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **02-20457**

A. Source Description

The Quality Castings Co. is increasing production through the Fischer Mold Line. The Fischer Mold Line consists of F024 "Fischer Mold Making Line," F025 "Fischer Pouring and Cooling," and P039 "Fischer Pushup/Punchout." Historically the 8,200 TPY restriction was sufficient to satisfy the facility's needs for iron production from this line. However, the facility now wants to use this line to produce more iron and is asking for the restriction to be raised to 19,000 TPY.

B. Facility Emissions and Attainment Status

The facility is located in Wayne Co. which is classified as attainment for all criteria pollutants. The facility is requesting synthetic minor restrictions to ensure that this change will not meet the definition of a "major modification." As demonstrated in the calculations page, no significant thresholds are exceeded.

C. Source Emissions

Particulate emissions from P039 are vented to a large baghouse. Particulate emissions from F024 and F025 are much less and are fugitive in nature. In raising the annual production restriction from 8,200 TPY to 19,000 TPY, there are net emissions increases associated with this project as follows:

Net increase for PM10 = 3.85 TPY

Net increase for VOC = 11.80 TPY

Net increase for SO₂ = 0.132 TPY

Net increase for NO_x = 0.071 TPY

Net increase for CO = 26.41 TPY

None of these net increases exceed the major modification thresholds.

D. Conclusion

By creating this permit as a synthetic minor permit, the annual production restriction will be federally enforceable and will ensure that this project remains outside the realm of a major modification. The facility also wishes to ensure that these limits are federally enforceable for future projects. For example, total HAPs, although relatively small, need to be synthetic minor to ensure that the facility remains eligible for area source status for any upcoming MACTs.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
WAYNE COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.
Center

Application No: 02-20457

Fac ID: 0285010001

DATE: 4/12/2005

The Quality Castings Company
Steve Steiner
1200 North Main Street
Orrville, OH 44667

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1800** will be due. Please do not submit any payment now.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NEDO

WAYNE COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 02-20457 FOR AN AIR CONTAMINANT SOURCE FOR
The Quality Castings Company**

On 4/12/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **The Quality Castings Company**, located at **1200 North Main Street, Orrville, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-20457:

Chapter 31 modification to increase production at three emissions units.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087
[(330)425-9171]



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 02-20457

Application Number: 02-20457
Facility ID: 0285010001
Permit Fee: **To be entered upon final issuance**
Name of Facility: The Quality Castings Company
Person to Contact: Steve Steiner
Address: 1200 North Main Street
Orrville, OH 44667

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1200 North Main Street
Orrville, Ohio**

Description of proposed emissions unit(s):
Chapter 31 modification to increase production at three emissions units.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Director

A. State and Federally Enforceable Permit To Install General Terms and Conditions**1. Monitoring and Related Recordkeeping 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:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. 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 appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.
- iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

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.

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6. 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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening 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.

7. 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 this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit

shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. 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.
- b. 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:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

10. Permit To Operate Application

- a. If 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

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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).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

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B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. 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 appropriate Ohio EPA District Office or local air agency.
- 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 appropriate Ohio EPA District Office or local air agency. 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., 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.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

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5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form

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if applicable) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

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SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PM/PM10	31.81
SO2	0.19
NOx	0.10
OC/VOC	16.43
CO	37.91
HAPs	1.21

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Emissions Unit ID: F024

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

none

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

none

The Q
PTI A

Emissions Unit ID: F024

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-21-07(G)
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F024 - Fischer Mold Making Line	OAC rule 3745-31-05(A)(3)	
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The terms and conditions of this PTI shall supercede the terms and conditions of PTI 02-2565 issued on March 31, 1999 pertaining to this emissions unit. PTI 02-2565 will remain effective for P902.

OAC rule 3745-31-05(C)

OAC rule 3745-17-08(B)

OAC rule 3745-17-07(B)

Applicable Emissions
Limitations/Control
Measures

0.40 lb/hr of particulate matter (PM)/particulate matter less than 10 microns in diameter (PM10)

7.40 lbs/hr of organic compounds (OC)

Visible emissions of fugitive dust shall not exceed 5% opacity, as a six-minute average.

0.38 TPY of PM/PM10 per rolling, 12-month period

3.70 TPY of OC per rolling, 12-month period

In accordance with paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) shall not apply to this emissions unit.

In accordance with paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) shall not apply to this emissions unit.

This emissions unit is exempt from the requirements of this rule pursuant to OAC rule 3745-21-07(G)(9). See section A.2.a.

2. Additional Terms and Conditions

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- 2.a** The permittee shall not employ any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.
- 2.b** The hourly emission limitations are based on this emissions unit's potential to emit. Therefore, no record keeping/reporting requirements are necessary to determine compliance with these limits.

II. Operational Restrictions

1. The maximum annual iron production for this emissions unit shall not exceed 19,000 TPY. The maximum annual OC emissions shall not exceed 3.70 TPY. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the production levels and emission limits specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Production</u> (Tons of iron produced)	<u>Maximum Allowable Annual Emissions of OC</u> (TPY)
1	1,584	0.31
1-2	3,168	0.62
1-3	4,752	0.93
1-4	6,336	1.24
1-5	7,920	1.55
1-6	9,504	1.86
1-7	11,088	2.17
1-8	12,672	2.48
1-9	14,256	2.79
1-10	15,840	3.10
1-11	17,424	3.41
1-12	19,000	3.70

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual production rate restriction shall be based upon a rolling, 12-month summation of the production rates and compliance with the annual emission limitation shall be based upon a rolling, 12-month summation of emissions.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
- a. the metal production rate for each month; and

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- b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the metal production rates.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative metal production rate for each calendar month.

2. The permittee shall maintain monthly records of the following information:
 - a. the name and identification of each liquid organic material employed in this emissions unit; and
 - b. a determination whether the material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
3. The permittee shall maintain the following records each month for this emissions unit:
 - a. the company identification of the mold release used;
 - b. the total amount of mold release used, in gallons;
 - c. the OC content of the mold release, in pounds of OC/pound of mold release;
 - d. the number of hours of operation;
 - e. an estimate of the total OC emission rate, in pounds, calculated as (b) x (the density of the mold release) x (c);
 - f. an estimate of the average hourly OC emission rate, calculated as (e/d); and
 - g. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of OC emissions.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions for each calendar month.

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

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

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month metal production rate restriction and of the rolling, 12-month OC emission limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production and OC emission levels.
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which a photochemically reactive material was employed.
3. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly OC emissions exceeded the emissions limitation of 7.40 pounds, and the actual average hourly OC emissions.
4. Quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.
5. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions 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 fugitive particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

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- 1.a Emission Limitation:
0.40 lb/hr of PM/PM10

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined using an emission factor of 0.04 lb of PE/ton of iron from Ohio EPA's manual entitled "Reasonably Available Control Measures" Table 2.7-1 and the maximum hourly production rate of 10 tons/hr.

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- 1.b Emission Limitation:
7.40 lbs/hr of OC

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the record keeping specified in section A.III.3. of these terms and conditions.

- 1.c Emission Limitation:
0.38 TPY of PM/PM10 per rolling, 12-month period
3.70 TPY of OC per rolling, 12-month period

Applicable Compliance Method:

The annual emission limitations were established by multiplying the maximum annual iron production rate of 19,000 tons by the respective emission factors referenced in sections A.V.1.a and A.V.1.b and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with this annual iron production rate, compliance with the emission limitations will be assumed.

Compliance with the annual production rate shall be demonstrated by the monitoring and record keeping in Section C.1.

- 1.d Emission Limitation:
Visible emissions of fugitive dust shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined using Method 9 of 40 CFR, Part 60, Appendix A.

VI. Miscellaneous Requirements

none

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F024 - Fischer Mold Making Line	none	none

2. Additional Terms and Conditions

2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

The Q
PTI A

Emissions Unit ID: F025

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
F025 - Fischer Pour and Cool Line	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(B)
The terms and conditions of this PTI shall supercede the terms and conditions of PTI 02-2565 issued on March 31, 1999 pertaining to this emissions unit. PTI 02-2565 will remain effective for P902.	OAC rule 3745-31-05(C)	
	OAC rule 3745-17-08(B)	

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PTI A**

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Applicable Emissions
Limitations/Control
Measures

paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) shall not apply to this emissions unit.

5.10 lbs/hr of particulate matter (PM)/particulate matter less than 10 microns in diameter (PM10)

1.40 lbs/hr of organic compounds (OC)

29.90 lbs/hr of carbon dioxide (CO)

Visible emissions of fugitive dust shall not exceed 5% opacity, as a six-minute average.

4.85 TPY of PM/PM10 per rolling, 12-month period

1.33 TPY of OC per rolling, 12-month period

28.41 TPY of CO per rolling, 12-month period

1.21 TPY of total hazardous air pollutants (HAPs) per rolling, 12-month period

In accordance with paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) shall not apply to this emissions unit.

In accordance with

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The hourly emission limitations are based on this emissions unit's potential to emit. Therefore, no record keeping/reporting requirements are necessary to determine compliance with these limits.

II. Operational Restrictions

1. The production of ductile iron through in-mold inoculation shall not be performed in this emissions unit.
2. The maximum annual iron production for this emissions unit shall not exceed 19,000 TPY. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Production</u> (Tons of iron produced)
1	1,584
1-2	3,168
1-3	4,752
1-4	6,336
1-5	7,920
1-6	9,504
1-7	11,088
1-8	12,672
1-9	14,256
1-10	15,840
1-11	17,424
1-12	19,000

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

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the metal production rate for each month; and

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- b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the metal production rates.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative metal production rate for each calendar month.

2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the rolling, 12-month iron production rate exceeded the operational restriction of 19,000 tons of iron, and the actual rolling 12-month production rate.
2. Quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions 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 fugitive particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
5.10 lbs/hr of PM/PM10

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined using an emission factor of 0.51 lbs per ton of iron poured (from emissions testing performed at this facility on January 18, 1996, for emissions unit P036) and the maximum hourly production rate of 10 TPH.

- 1.b Emission Limitation:
1.40 lbs/hr of OC

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined using an emission factor of 0.14 lb/ton from FIRE version 6.25 SCC 3-04-003-20 and the maximum hourly production rate of 10 TPH.

- 1.c Emission Limitation:
29.90 lbs/hr of CO

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined using an emission factor of 2.99 lbs/ton from testing of a similar source at GM's Saginaw MI foundry and the maximum hourly production rate of 10 TPH.

- 1.d Emission Limitation:
4.85 TPY of PM/PM10 per rolling, 12-month period
1.33 TPY of OC per rolling, 12-month period
28.41 TPY of CO per rolling, 12-month period

Applicable Compliance Method:

The annual emission limitations were established by multiplying the maximum annual iron production rate of 19,000 tons by the respective emission factors referenced in sections A.V.1.a through A.V.1.c and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with this annual iron production rate, compliance with the emission limitations will be assumed.

Compliance with the annual production rate shall be demonstrated by the monitoring and record

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keeping in Section C.1.

- 1.e Emission Limitation:
1.21 TPY of total HAPs per rolling, 12-month period

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Applicable Compliance Method:

The annual emission limitation was established by multiplying the maximum annual iron production rate of 19,000 tons by the emission factors below and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with this annual iron production rate, compliance with the emission limitation will be assumed. Compliance with the annual production rate shall be demonstrated by the monitoring and record keeping in Section C.1.

Emission Factors from "Foundry Process Emission Factors: Baseline Emissions from Automotive Foundries in Mexico," McClellan Air Force Base, California, January, 1999.

Acetaldehyde =	4.72E-03 lb/ton
Acetophenone =	7.90E-04 lb/ton
Benzene =	4.88E-02 lb/ton
Cumene =	2.05E-04 lb/ton
Dibenzofurans =	5.39E-05 lb/ton
Ethylbenzene =	2.48E-03 lb/ton
Formaldehyde =	2.93E-03 lb/ton
— Xylenes =	1.02E-02 lb/ton
Naphthalene =	4.14E-03 lb/ton
Nitrobenzene =	2.01E-05 lb/ton
o-Cresol =	1.52E-03 lb/ton
o-Xylenes =	5.20E-03 lb/ton
Phenol =	9.10E-03 lb/ton
Propanol =	5.68E-05 lb/ton
Styrene =	9.09E-04 lb/ton
Toluene =	2.59E-02 lb/ton
Antimony =	6.21E-05 lb/ton
Arsenic =	1.14E-05 lb/ton
Cadmium =	5.25E-05 lb/ton
Chromium =	3.79E-04 lb/ton
Cobalt =	5.30E-03 lb/ton
Lead =	4.80E-04 lb/ton
Manganese =	3.16E-03 lb/ton
Nickel =	4.32E-04 lb/ton
Selenium =	2.46E-05 lb/ton
<u>Total HAPs =</u>	<u>0.127 lb/ton</u>

- 1.f Emission Limitation:
Visible emissions of fugitive dust shall not exceed 5% opacity, as a six-minute average.

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Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined using Method 9 of 40 CFR, Part 60, Appendix A.

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Issued: To be entered upon final issuance

Emissions Unit ID: F025

VI. Miscellaneous Requirements

none

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F025 - Fischer Pour and Cool Line	none	none

2. Additional Terms and Conditions

2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none

The Q
PTI A

Emissions Unit ID: P039

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P039 - Fischer Pushup/Punchout, vented to a baghouse	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-08(B)
The terms and conditions of this PTI shall supercede the terms and conditions of PTI 02-2565 issued on March 31, 1999 pertaining to this emissions unit. PTI 02-2565 will remain effective for P902.		OAC rule 3745-17-07(B)
		OAC rule 3745-17-11(B)
		OAC rule 3745-31-05(C)

Applicable Emissions <u>Limitations/Control</u> <u>Measures</u>	
0.010 gr/dscf, 6.0 lbs/hr of particulate matter (PM)/particulate matter less than 10 microns in diameter (PM10) from the baghouse stack serving this emissions unit and emissions units F021, P021, and P902.	11.40 TPY of OC per rolling, 12-month period
0.30 TPY of fugitive PM emissions	9.50 TPY of CO per rolling, 12-month period
0.21 TPY of fugitive PM10 emissions	In accordance with paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) shall not apply to this emissions unit.
12.00 lbs/hr of organic compounds (OC)	In accordance with paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) shall not apply to this emissions unit.
10.00 lbs/hr of carbon dioxide (CO)	The emission limitation established in this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
Visible emissions of fugitive dust shall not exceed 5% opacity, as a six-minute average.	The visible emission limitation specified in this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
Visible PE from the baghouse stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average.	
26.28 TPY of PM/PM10 per rolling, 12-month period from the baghouse stack serving this emissions unit and emissions units F021, P021, and P902.	
0.21 TPY of PM10 per rolling, 12-month period (fugitive)	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The hourly emission limitations are based on this emissions unit's potential to emit. Therefore, no record keeping/reporting requirements are necessary to determine compliance with these limits.

II. Operational Restrictions

1. The maximum annual iron production for this emissions unit shall not exceed 19,000 TPY. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Production</u> (Tons of iron produced)
1	1,584
1-2	3,168
1-3	4,752
1-4	6,336
1-5	7,920
1-6	9,504
1-7	11,088
1-8	12,672
1-9	14,256
1-10	15,840
1-11	17,424
1-12	19,000

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

2. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water column while the emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
- a. the metal production rate for each month; and

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- b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the metal production rates.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative metal production rate for each calendar month.

2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be 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 baghouse on a daily basis.
3. The permittee shall perform daily checks, when the emissions unit is 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 perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d)

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above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the rolling, 12-month iron production rate exceeded the operational restriction of 19,000 tons of iron, and the actual rolling 12-month production rate.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
3. Quarterly deviation (excursion) reports shall be submitted in accordance with the General 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 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 Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
5. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions 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 fugitive particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
0.010 gr/dscf, 6.0 lbs/hr of PM/PM10 from the baghouse stack serving this emissions unit and emissions units F021, P021, and P902.

Applicable Compliance Method:

Compliance with the hourly and grain loading emission limits shall be determined by stack testing as specified in section A.V.2. of these terms and conditions.

The hourly limit of 6.0 lbs/hr is based on a grain loading limit of 0.010 gr/dscf and the gas flow rate for the baghouse of 70,000 scfm.

- 1.b Emission Limitation:
0.30 TPY of fugitive PM and 0.21 TPY of fugitive PM10

Applicable Compliance Method:

Compliance with the annual fugitive emission limitations shall be determined using the following equation:

$$A = EF \times P \times (1 - CE) \times / 2,000 \text{ lbs/ton}$$

A = annual fugitive emission rate (TPY);

EF = emission factor of 3.20 lbs of PM/ton from FIRE ver 6.25 SCC 3-04-003-31;

= emission factor of 2.24 lbs of PM10/ton from FIRE ver 6.25 SCC 3-04-003-31;

P = maximum annual process weight rate (19,000 TPY); and

CE = fractional capture efficiency of baghouse = 0.99.

- 1.c Emission Limitation:
12.00 lbs/hr of OC

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined using an emission factor of 1.20 lbs/ton from FIRE version 6.25 SCC 3-04-003-31 and the maximum hourly production rate of 10 TPH.

- 1.d Emission Limitation:
10.00 lbs/hr TPY of CO

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Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined using an emission factor of 1.00 lbs/ton from Waupaca foundry RBLC determination in Indiana and the maximum hourly production rate of 10 TPH.

1.e Emission Limitation:

26.28 TPY of PM/PM10 per rolling, 12-month period from the baghouse stack serving this emissions unit and emissions units F021, P021, and P902.

Applicable Compliance Method:

The annual emission limitation was established using the allowable grain loading limit for the baghouse stack (0.010 gr/dscf), the baghouse flow rate 70,000 scfm and potential operating hours of 8,760 hrs/yr. Therefore, compliance with the annual limit is assumed, as long as compliance with the grain loading limit is maintained.

1.f Emission Limitation:

0.21 TPY of PM10 per rolling, 12-month period (fugitive)
11.40 TPY of OC per rolling, 12-month period
9.50 TPY of CO per rolling, 12-month period

Applicable Compliance Method:

The annual emission limitations were established by multiplying the maximum annual iron production rate of 19,000 tons by the respective emission factors referenced in sections A.V.1.a through A.V.1.c and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with this annual iron production rate, compliance with the emission limitations will be assumed. Compliance with the annual production rate shall be demonstrated by the monitoring and record keeping in Section C.1.

1.g Emission Limitation:

Visible emissions of fugitive dust shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined using Method 9 of 40 CFR, Part 60, Appendix A.

1.h Emission Limitation:

Visible PE from the baghouse stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:

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If required, compliance with the visible emission limitation shall be determined using Method 9 of 40 CFR, Part 60, Appendix A.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted in accordance with the schedule in the permittee's Title V permit (issued on April 28, 2003) for P021, P039, and P902.
 - b. The emission testing shall be conducted to demonstrate compliance with the mass emission limit for particulate emissions from the baghouse serving this emissions unit.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-5 of 40 CFR Part 60, Appendix A.
 - d. The test(s) shall be conducted while this emissions unit and emissions units F021, P021, and P902 are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

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 Northeast District Office. 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 Northeast District Office's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s).

VI. Miscellaneous Requirements

none

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P039 - Fischer Pushup/Punchout	none	none

2. Additional Terms and Conditions

2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none