

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

Permit To Install **02-12995**

**A. Source Description**

This source, the Technocast Inc. facility, is located at 1100 North Main Street in Orrville, Ohio. The moldmaking units which are being modified are the Hunter HMP-10 (F027) and the HMP-20 (F028).

**B. Facility Emissions and Attainment Status**

The Technocast Inc. facility is located in Wayne County. Wayne County is attainment for particulate, sulfur dioxide, carbon monoxide, ozone, lead, and oxides of nitrogen. This facility is a Title V facility for Particulate matter and Organic Compounds. A draft Title V has been issued February 22, 2001.

**C. Source Emissions**

Emissions from the two Hunter Moldmaking Units (F027-F028) consist of organic compounds from the mold parting spray. The usage of parting spray is 0.80 gallons per hour in HMP -10 (F027) which would not exceed the allowable rate of 5 lb/hr or 21.9 tons per year of organic compounds. The usage of parting spray in HMP-20 (F028) at 8760 hours would put the OC emissions for this project well over the 40 Ton per year of OC threshold for Prevention of Significant Deterioration (PSD).

The facility has agreed to limit its annual parting spray usage in emissions unit F028 to 5741 gallons per any 12-month period. This amounts to an annual limit of 18 Tons of OC per year, on a rolling twelve month summation, and an hourly limit of 7.59 lb of OC per hour. The total usage of parting spray for the The usage of the parting spray for the entire project will then be under 40 tons per year. This synthetic minor permit requires the permittee to maintain records of parting spray usage and to submit reports concerning exceedances of parting spray usage.

**D. Conclusion**

Emissions units F027-F028 will have each have a short term emissions limits for OC. The permittee will be required to record the monthly parting spray usage, organic compound content of the spray, and the hours of operation of the units. Also, a 12- month summation of the parting spray usage rate in emissions unit F028 will also be required. With these restrictions, the potential to emit from the facility will be 39.9 Tons per year. This will keep the facility from tripping the significant threshold limits for PSD as defined in 40 CFR Part 52.

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: 02-12995**

**DATE: 6/26/2001**

Technocast Inc  
David Beard  
1100 N Main St  
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 **\$400** 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.

Very truly yours,

Thomas G. Rigo  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

NEDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install**

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

**DRAFT PERMIT TO INSTALL 02-12995**

Application Number: 02-12995  
APS Premise Number: 0285010034  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Technocast Inc  
Person to Contact: David Beard  
Address: 1100 N Main St  
Orrville, OH 44667

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1100 North Main St  
Orrville, Ohio**

Description of proposed emissions unit(s):

**Hunter HMP-10 and HMP-20 moldmaking 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

Technocast Inc

Facility ID: 0285010034

PTI Application: 02-12995

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

**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.10 below if no deviations occurred during the quarter.

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- 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.

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**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.

**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

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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.

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**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 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 thirty (30) 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.

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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 Related to Monitoring and Recordkeeping 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. 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.

**5. 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

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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.

**6. 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.

**7. 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.

**8. 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).

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**9. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

**10. 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.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| OC               | 39.9                 |
| PM               | 1.58                 |

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**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**

**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> | <u>Applicable Emissions Limitations/Control Measures</u>   |
|---|--------------------------------------|--|
| Hunter<br>Moldmaking                          | HMP-10                               | OAC rule 3745-21-07(G)(2)  |
|   |                                      | OAC rule 3745-17-08(B)   |
|   |                                      | OAC rule 3745-17-07 (B)  |
|   |                                      | See A.2.a  |
|   |                                      | 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. |

**2. Additional Terms and Conditions**

- 2.a This emissions unit shall not employ organic liquids which are photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5).

**II. Operational Restrictions**

NONE

**III. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall keep the following records on all materials used in this emissions unit:
  - a. The identification of the chemical compound and its physical state.
  - b. For any liquid organic materials, whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
- 2. Each record of any monitoring data, testing data, and support information required

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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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include an identification of each day during which any photochemically reactive materials were employed.
2. The permittee shall submit required reports in the following manner:
  - a. Reports of any required monitoring and/or recordkeeping 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 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.)

**V. Testing Requirements**

NONE

**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>   |
|---|--------------------------------------|--|
| Hunter<br>Moldmaking                          | HMP-10<br>OAC rule 3745-31-05(A)(3)  | OC: 5 pounds per hour<br>OC: 21.9 tons per year<br><br>PM: 0.12 pounds per hour<br>PM: 0.53 tons per year<br><br>VE: 20% as a three minute average |

2. **Additional Terms and Conditions**

NONE

**II. Operational Restrictions**

NONE

**III. Monitoring and/or Recordkeeping Requirements**

1. Monitoring and/or record keeping requirements for the hourly organic compound limit is not required by this permit. Based on applying the parting spray compound at the maximum rate of 0.80 gallons per hour and assuming 100% evaporation of the organic compounds at the moldmaking machine, the actual organic compound emissions would not exceed the allowable emission rate of 5 pounds per hour.
2. The permittee shall keep the following records each month:
  - a. The company identification of the pattern spray used.
  - b. The amount of pattern spray used (gallons).
  - c. The organic compound content of the parting spray (lbs OC/gal).

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- d. Hours of operation for the emissions unit.

#### IV. Reporting Requirements

NONE

#### V. Testing Requirements

1. Emission Limitation: 0.12 lb PM/hr

Applicable Compliance Method:

To determine the maximum emission rate for particulate matter, the following equation shall be used:

$$E = T_i \times 0.04 \text{ lb PM/ton iron}$$

where

E = maximum lbs particulate matter emitted per hour

T<sub>i</sub> = maximum iron production rate for the Hunter line

0.04 lb PM/ton iron is an emission factor in lbs particulate matter per ton iron produced (from Ohio EPA's document "Reasonably Available Control Measures for Fugitive Dust Sources", Table 2.7-1 for mold making)

2. Emission Limitation: 0.53 tons PM/hr

Applicable Compliance Method:

To determine the annual emission rate for particulate matter, multiply the allowable hourly limit by actual annual operating hours and divide by 2000 (lbs/tn).

3. Emission Limitation: visible particulate emissions shall not exceed 20% opacity as a three-minute average

Applicable Compliance Method: Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

4. Emission Limitation: 21.9 tons OC/yr

**Technocast Inc**  
**PTI Application: 02-12005**  
**Issued**

**Facility ID: 0285010034**

Emissions Unit ID: **F027**

Applicable Compliance Method: Compliance with the OC emission limitation shall be based on the the following equation:

**Techn  
PTI A**

Emissions Unit ID: **F027**

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$$E = (\text{VOL}) \times (\text{OC}) \times 1\text{ton}/2000 \text{ lbs}$$

where

E = tons of OC emitted

VOL = gallons of parting spray used annually

OC = lbs OC/gallon parting spray

Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the parting spray employed in the emissions unit.

**VI. Miscellaneous Requirements**

**NONE**

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**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>   | <u>Applicable Emissions Limitations/Control Measures</u>   |
|---|--|--|
| Hunter HMP 20-<br>Moldmaking.                 | Synthetic Minor to avoid Prevention of Significant Deterioration (PSD)<br><br>OAC rule 3745-21-07(G)(2)<br><br>OAC rule 3745-17-08(B)<br><br>OAC rule 3745-17-07 (B) | 18 tons OC per year, as a rolling, 12-month summation, see A.II.1<br><br>OC -7.59 pounds per hour<br><br>See A.2.a<br><br>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.<br><br>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. |

2. **Additional Terms and Conditions**

- 2.a This emissions unit shall not employ organic liquids which are photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5).

**II. Operational Restrictions**

1. The maximum annual usage of parting spray for this emissions unit shall not exceed 5741 gallons, based upon a rolling 12-month summation of parting spray usage.

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

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| <u>Month(s)</u> | <u>Maximum Allowable<br/>Cumulative Parting Spray Usage<br/>(Gallons)</u> |
|-----------------|---|
| 1               | 478   |
| 1-2             | 956   |
| 1-3             | 1434  |
| 1-4             | 1912  |
| 1-5             | 2390  |
| 1-6             | 2868  |
| 1-7             | 3346  |
| 1-8             | 3824  |
| 1-9             | 4302  |
| 1-10            | 4780  |
| 1-11            | 5258  |
| 1-12            | 5741  |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual parting spray usage limitation shall be based upon a rolling, 12-month summation of the parting spray usage figures.

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall keep the following records on all materials used in this emissions unit:
  - a. The identification of the chemical compound and its physical state.
  - b. For any liquid organic materials, whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. Monitoring and/or record keeping requirements for the hourly organic compound limit is not required by this permit. Based on applying the parting spray compound at the maximum rate of 1.21 gallons per hour and assuming 100% evaporation of the organic compounds at the moldmaking machine, the actual organic compound emissions would not exceed the allowable emission rate of 7.59 pounds per hour.
3. The permittee shall maintain monthly records of the following information:
  - a. The parting spray usage for each month (gallons).
  - b. The organic compound content of the parting spray (lbs OC/gal).

- c. The hours of operation for the emissions unit.
- d. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the coating usage figures.

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

4. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

#### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include an identification of each day during which any photochemically reactive materials were employed.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative parting spray usage levels.
3. The permittee shall submit annual reports identifying the annual OC emissions for the previous calendar year. These reports shall be submitted by January 31 of each year.
  4. The permittee shall submit required reports in the following manner:
    - a. Reports of any required monitoring and/or recordkeeping 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 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

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malfunctions reported in accordance with OAC rule 3745-15-06.)

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**V. Testing Requirements**

1. Emission Limitation: 18 tons/yr OC, as a rolling 12-month summation

Applicable Compliance Method: Compliance with the OC emission limitation shall be assumed as long as the 5741 gallon parting spray usage limit is met. This is based on the recordkeeping requirement in term A.III and the following calculation:

$$E = (\text{VOL}) \times (\text{OC}) \times 1\text{ton}/2000\text{ lbs}$$

where

E = tons of OC emitted

VOL = gallons of parting spray used during any twelve month period

OC = lbs OC/gallon parting spray

**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>                                     |
|---|--------------------------------------|--|
| Hunter HMP 20-<br>Moldmaking.                 | OAC rule 3745-31-05(A)(3)            | PM - 0.24 pounds per hour<br>PM - 1.05 tons per year<br><br>VE-20% as a three minute average |

**2. Additional Terms and Conditions**

NONE

**II. Operational Restrictions**

NONE

**III. Monitoring and/or Recordkeeping Requirements**

NONE

**IV. Reporting Requirements**

NONE

**V. Testing Requirements**

1. Emission Limitation: 0.24 lb PM/hr

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Applicable Compliance Method:

To determine the maximum emission rate for particulate matter, the following equation shall be used:

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$$E = T_i \times 0.04 \text{ lb PM/ton iron}$$

where

E = maximum lbs particulate matter emitted per hour

T<sub>i</sub> = maximum iron production rate for the Hunter line

0.04 lb PM/ton iron is an emission factor in lbs particulate matter per ton iron produced (from Ohio EPA's document "Reasonably Available Control Measures for Fugitive Dust Sources", Table 2.7-1 for mold making)

2. Emission Limitation: 1.05 tons PM/yr

Applicable Compliance Method:

To determine the annual emission rate for particulate matter, multiply the allowable hourly limit by actual annual operating hours and divide by 2000 (lbs/tn).

3. Emission Limitation: visible particulate emissions shall not exceed 20% opacity as a three-minute average

Applicable Compliance Method: Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

**VI. Miscellaneous Requirements**

**NONE**