

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

Permit To Install **02-13011**

Technocast Inc

A. Source Description

Technocast, Inc. is proposing to modifying the sand preparation operation for the Hunter mold lines (emissions unit F008). This modification would allow for the increase in annual sand throughput from 171,600 tons per year to 205,920. It would also allow an increase for fugitive particulate emissions from 0.28 ton per year to 0.74 ton per year. Emissions unit F008 was originally permitted in 1995 under PTI 02-9055, a synthetic minor permit. Emissions unit F008 was permitted in 1995 together with units P026 and P027 as part of a facility expansion. This permit, therefore, will replace the requirements of PTI 02-9055 for emissions unit F008.

This is an existing facility, located in the city of Orrville, Wayne County.

B. Facility Emissions and Attainment Status

The Technocast facility is a major stationary source for particulate matter (PM). The facility has minor emissions of the other criteria pollutants. Wayne county is attainment for PM/PM₁₀. PTI 02-9055 limited units F008, P026 (Hunter HMP-20 pouring and cooling), and P027 (shakeout) to 16.4 tons per year of particulate matter and 14.5 tons per year PM₁₀. The permit restricted the operating hours, sand throughput and iron production rates for the emissions units. This was done so as to keep the emissions from the project below what is considered "significant" in the federal PSD rules (40 CFR 52.21).

C. Source Emissions

This PTI allows for the modification of emissions unit F008 only. The sand throughput will increase to 205,920 tons per year. The proposed modification potentially increases fugitive emissions (PM/PM₁₀) from 0.28 ton per year to 0.74 ton per year. Stack emissions will continue to be limited to 0.006 gr/dscf from the baghouse stack and 0.015 gr/dscf from the scrubber stack. There will be no increase in operating hours. After the modification, the total allowable emission rate for emission units F008, P026, and P027 will be 16.86 tons per year of PM and 14.96 tons per year PM₁₀.

The permit to install will contain terms and conditions for emissions unit F008 which will limit the annual sand throughput to 205,920 tons per 12-month period and will continue to limit operating hours to 4,400 hours per 12-month period. The permit will require monthly record keeping for sand throughput and operating hours. With these limitation, the combined potential to emit for emissions units F008, P026 and P027 will be: 16.4 tons PM and 14.96 tons PM₁₀ per year. These are not considered significant increases for PM and PM₁₀ under federal PSD regulations (40 CFR 52.21).

D. Conclusion

Emissions unit F008 is being modified to increase sand throughput and fugitive dust emissions. The unit will continue to have a short term emissions limit for PM/PM₁₀ from its stacks. In addition, production and operating hours in emissions unit F008 will be limited over a rolling 12-month period. The permittee will be required to maintain monthly records on production and operating hours. The new allowable emission rate for F008 will be: 7.23 tons/yr PM/PM₁₀. Therefore, the combined potential to emit for units F008, P026 and P027 will be 16.86 tons PM and 14.96 tons PM₁₀ per year. These emissions rate are not considered significant under the definitions of Prevention of Significant Deterioration (PSD). Therefore, further PSD review for PM/PM₁₀ is not required.



State of Ohio Environmental Protection Agency

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

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

Application No: 02-13011

DATE: 4/10/2001

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 **\$1000** 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



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Terms and Conditions

DRAFT PERMIT TO INSTALL 02-13011

Application Number: 02-13011
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):

Modification to Hunter operations sand preparation to increase allowable emission rate.

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: 02-13011

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.11 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.

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

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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 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

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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.

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>
PM	7.23
PM10	

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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

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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>	<u>Applicable Emissions Limitations/Control Measures</u>
Hunter operations: sand preparation with fabric filter baghouse and wet scrubber (modification)	OAC rule 3745-31-05(A)(3)	PM/PM10: 0.006 gr/dscf and 1.52 lbs/hr (Baghouse stack), 0.015 gr/dscf and 1.43 lbs/hr (scrubber stack), Visible emissions shall not exceed 5% opacity as a six minute average from the baghouse stack
	OAC 3745-31-05(D)	7.23 tons per rolling 12-month period (6.49 tons from stacks and 0.74 ton fugitive)
	OAC rule 3745-17-08(B)	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.
	OAC rule 3745-17-07(B)	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.
	OAC rule 3745-17-11	Less stringent than the limit from 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)	

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Less stringent than the
limit from

3745-31-05(A)(3)

Emissions Unit ID: **F008**

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

2.a Particulate matter emissions from unit F008 is captured and controlled by the 150,000 acfm Hunter fabric filter baghouse and a wet scrubber. This baghouse and scrubber also control particulate emissions from other emissions units as listed below:

Controlled	by	baghouse
Controlled by scrubber		
F003 - BMM shakeout		F007 -
BMM moldmaking		
F018 - Electric Furnace #1		P023 -
Laempe I		
F019 - Electric Furnace #3		P025 -
Laempe II		
F031 - Electric Furnace #2		P024 -
Isocure machine		
P026 - Hunter Pour and Cool		
P027 - Didion drum shakeout		

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 7 inches of water while the emissions unit is in operation.
2. The pressure drop across the scrubber shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation.
3. The scrubber water flow rate shall be continuously maintained at a value not less than the minimum flow rate (gallons per minute) that was measured and recorded during the emissions test required by this permit that was conducted to demonstrate compliance with the particulate matter emission limitations.
4. The collection efficiency of the air pollution capture hoods for this emissions unit shall be sufficient to minimize or eliminate visible emissions of fugitive dust at all points of capture. The permittee shall maintain all hoods and enclosures in good operating condition. The collection efficiency shall be considered adequate if visible particulate emissions of fugitive dust do not exceed 0% opacity. For purposes of verifying compliance with this visible emissions requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

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Emissions Unit ID: **F008**

5. The maximum annual operating hours for emissions unit F008, P026 and P027 shall not exceed 4,400, based upon a rolling, 12-month summation of the operating hours. The rolling, 12-month summation of the sand muller's operating time will be recorded to demonstrate compliance with the annual operating hours limitation.
6. The maximum annual sand production rate for emissions unit F008 shall not exceed 205,920 tons, based upon a rolling, 12-month summation of the production rates.
7. The maximum hourly sand production rate for emissions unit F008 shall not exceed 46.8 tons.

III. Monitoring and/or Recordkeeping Requirements

1. 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 installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a continuous basis.
2. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
3. The permittee shall collect and record the following information each day:
 - a. The pressure drop across the scrubber, in inches of water, on a daily basis.
 - b. The scrubber water flow rate, in gallons per minute, on a daily basis.
4. The permittee shall maintain monthly records of the following information:
 - a. The sand throughput/production rate in emissions unit F008 for each month (tons).
 - b. The rolling, 12-month summation of the sand throughput/production rates (tons).
 - c. The operating hours of the emissions unit for each month.
 - d. The rolling, 12-month summation of the operating hours.

IV. Reporting Requirements

1. The permittee shall submit 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.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
 - a. The static pressure drop across the scrubber.
 - b. The scrubber water flow rate.
3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate limitation.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the

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Emissions Unit ID: **F008**

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rolling, 12-month operating hours limitation.

5. The reports denoted in A IV.1 - 4 of this permit are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

V. Testing Requirements

1. Emission Limitation: 0.006 gr/dscf and 1.52 pounds PM/PM10 per hour from fabric filter stack

Applicable Compliance Method: Compliance shall be demonstrated by the emissions testing and procedures specified in section A.V.6 of these terms and conditions.

The hourly limit of 1.52 pounds per hour is based on a grain loading limit of 0.006 gr/dscf and the anticipated gas flow rate from emissions unit F008 of 29,500 SCFM.

2. Emission Limitation: 0.015 gr/dscf and 1.43 pounds PM/PM10 per hour from scrubber stack

Applicable Compliance Method: Compliance shall be demonstrated by the emissions testing and procedures specified in section A.V.6 of these terms and conditions.

The hourly limit of 1.43 pounds per hour is based on a grain loading limit of 0.015 gr/dscf and the anticipated gas flow rate from emissions unit F008 of 11,125 SCFM.

3. Emission Limitation: 7.23 tons PM/PM10 for any 12-month period.

Applicable compliance Method: Compliance with this limit is assumed provided that the hourly limit on the baghouse and scrubber are met, and the restrictions in production and operating hours are not exceeded. The following equation shall be used to estimate monthly PM emissions:

$$E_t = E_s + E_f$$

Where,

$E_s = (1.52 \text{ lbs/hr} + 1.43 \text{ lbs/hr}) \times H$ (monthly hours of operation) $\times 1/2000$ (ton/pounds), allowable stack emissions from baghouse and scrubber, respectively

$E_f = 3.6 \text{ lbs PM/ton of sand processed (uncontrolled PM emission factor)} \times 0.002$ (percent of emissions not captured) $\times T_s$ (tons sand processed monthly) $\times 1/2000$ (ton/pounds), fugitive emissions

Sum the monthly emissions over any 12 month period to show compliance with the rolling limit.

Emissions Unit ID: F008

4. Compliance with the visible emission limitation on the baghouse stack shall be determined by using U.S. EPA method 9, if required by the Ohio EPA.
5. Compliance with the visible emission limitation for the fugitive emissions identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. The points of observation for visible emissions shall include any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
6. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 3 months after issuance of the permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the mass emission limits for particulate matter.
 - 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 the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
 - f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the

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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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

- 1. The requirements of this permit to install shall replace the requirements of PTI 02-9055 for emissions unit F008.

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 operations: sand preparation with fabric filter baghouse and wet scrubber (modification)	None	Air Toxics Policy

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

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None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emission unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined in OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.