



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
AUGLAIZE COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:  
Lazarus Gov.  
Center

**Application No: 03-13316**

**DATE: 2/2/00**

St Marys Foundry Co  
Kip Reiher  
405 E South St  
Saint Marys, OH 45885

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

NWDO



**Permit To Install**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Terms and Conditions**

**FINAL PERMIT TO INSTALL 03-13316**

Application Number: 03-13316  
APS Premise Number: 0306010004  
Permit Fee: **\$2400**  
Name of Facility: St Marys Foundry Co  
Person to Contact: Kip Reiher  
Address: 405 E South St  
Saint Marys, OH 45885

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

**405 E South St**  
**Saint Marys, Ohio**

Description of proposed emissions unit(s):

**Sand silo w/baghouse and mold/core coating operation.**

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

## 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.

- 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.

## 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 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.

## **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 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 are inadequate 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 prove to be inadequate 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).

**9. 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.

**10. 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.

**11. 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>
VOC	46.58
PE	3.90

**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>
28.8 tons/hr sand silo	OAC rule 3745-17-07(A)	20% opacity, as a 6-minute average, except as provided by rule
	OAC rule 3745-17-11(B)(2)	3.57 lbs PE/hr

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 5 to 7 inches of water while the emissions unit is in operation.

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

1. The permittee shall properly install, 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 weekly basis.

**IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify that all

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Emissions Unit ID: **P018**

periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

**V. Testing Requirements**

1. Compliance Methods Requirements: Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation: 20% opacity, as a 6-minute average, except as provided by rule

Applicable Compliance Method: Method 9 of 40 CFR Part 60, Appendix A

b. Emission Limitation: 3.57 lbs PE/hr

Applicable Compliance Method: The particulate emissions will be controlled by a baghouse. The baghouse will result in an emission rate of 0.89 lb PE/hr as determined in accordance with the following:

$$\text{PE (lb/hr)} = (0.02 \text{ gr/dscf}) (5200 \text{ ft}^3/\text{min}) \\ (\text{lb}/7000 \text{ gr}) (60 \text{ min/hr}) = 0.89 \text{ lb PE/hr}$$

Compliance will be demonstrated by the monitoring and recordkeeping specified in A..III. If required, the permittee shall demonstrate compliance by testing in accordance with OAC rule 3745-17-03(B)(10).

**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>
28.8 tons/hr sand silo	OAC rule 3745-31-05	0.02 gr/dscf, 0.89 lb PE/hr, 3.90 TPY PE  Control requirements (see B.I.2.a)

**2. Additional Terms and Conditions**

- 2.a** The control requirement for emissions unit P018 is: the use of a baghouse.

**II. Operational Restrictions**

See A.II

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

See A.III

**IV. Reporting Requirements**

See A.IV

**V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I. of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation: 0.02 gr/dscf, 0.89 lb PE/hr, 3.90 TPY PE

Applicable Compliance Method: The 0.02 grains/dry standard cubic foot limit is the established BAT outlet grain loading concentration. The lbs/hr limitation is derived by multiplying the baghouse outlet limit of 0.02 gr/dscf, the baghouse's exhaust volume (5200 acfm), pound/7000 grains and 60 minutes/hour. The TPY limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hours/year and dividing by ton/2000 pounds. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

## 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>
Mold/core operations coating	OAC rule 3745-21-07(G)(2)	None (see A.II)
	OAC rule 3745-17-07(A)	None (see A.I.2.a)
	OAC rule 3745-17-11	None (see A.I.2.b)

**2. Additional Terms and Conditions**

- 2.a This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply since the facility is located in Auglaize county.

**II. Operational Restrictions**

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

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

1. The permittee shall maintain records of the following information for this emissions unit:
  - a. the company identification for each liquid organic material employed in this emissions unit; and

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b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None

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**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>
Mold/core operations                      coating	OAC rule 3745-31-05	7.48 lbs OC/hr, 32.76 TPY OC from the application of coating  2303 lbs OC/month, 13.82 TPY OC from cleanup operations  3.46 lbs PE/hr, 15.15 TPY PE  Control requirements (see B.I.2.a)

**2. Additional Terms and Conditions**

- 2.a The "Best Available Technology" (BAT) for this emissions unit has been determined to be the use of flammable solvent-based core and molding coatings with "light off" operations to reduce emissions (see B.II.5).

**II. Operational Restrictions**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the

Emissions Unit ID: **R001**

SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: isopropyl alcohol

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 7.48

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2161.7  
MAGLC (ug/m3): 23,405

2. 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 by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
  - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
  - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
  - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
  - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
  - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

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- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
4. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.
5. The permittee shall "light" the coating on the molds/cores immediately (within one minute).

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

1. The permittee shall collect and record the following each month:
  - a. the name and identification of each coating employed;
  - b. the OC content of each coating, in pounds per gallon, as applied;
  - c. documentation on whether or not each coating is a flammable solvent based material;
  - d. the number of gallons of each coating employed;
  - e. the total OC emissions from each coating employed, in pounds in accordance with the following equation:  $(b \times d) (1-ER)$  {ER = emissions reduction experienced due to "light off" (70%)};
  - f. documentation that "light off" operations were employed to each coating applied;
  - g. the total OC emissions from all coatings, in pounds (summation of e); and
  - h. in conjunction with the recordkeeping above, the permittee shall calculate and record the annual, year to date OC emissions from all coatings employed (summation of e for each calendar month to date from January to

December).

2. The permittee shall calculate and record the following information each month for this emissions unit:
  - a. the name and identification number of each clean up material employed;
  - b. the OC content of each clean up material, in pounds/gallon;
  - c. the number of gallons of each clean up material employed;
  - d. the total emissions of OC from each clean up material, in pounds (b x c); and
  - e. the total emissions of OC from all clean up materials, in pounds (summation of d); and
  - f. the annual, year to date OC emissions from all clean up materials employed, (summation of e for each calendar month to date from January to December).
  
3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

1. The permittee shall submit annual written reports of any deviations from the annual emission limitation in section B.I. The reports shall be submitted by annually by January 31 of each year and shall cover the previous calendar year. These reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.
2. The permittee shall submit reports of any deviation from the monthly cleanup material emission limitation in section B.I. The reports shall be submitted in accordance with the general terms and conditions of this permit. These reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.
3. The permittee shall submit deviation (excursion) reports which identify each time during which a non-flammable based mold/core coating was used.
4. The permittee shall submit deviation (excursion) reports which identify each time during which "light off" operations were not immediately employed.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in Section B.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: 7.48 lbs OC/hr, 32.76 TPY OC from the application of coating

Applicable Compliance Method: No record keeping is required to show compliance with the hourly emission limitation because the limits are based on the source's potential to emit\*. Compliance with the TPY emission limitation shall be based upon the recordkeeping requirements specified in section B.III.1 of this permit.

\*The potential emit for this emissions unit was determined by multiplying the maximum hourly gallon usage, the OC content of the coating and the emission reduction for lighting off the coating.  
(4.61 lbs OC/gal) (5.41 gal/hr) (1-0.7) =

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7.48 lbs OC/hr

- b. Emission Limitation: 2303 lbs OC/month, 13.82 TPY OC from cleanup operations

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements specified in section B.III.2 of this permit.

- c. Emission Limitation: 3.46 lbs PE/hr, 15.15 TPY PE

Applicable Compliance Method: To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the paint spraying operation:

E = particulate emissions rate (lbs/hr)

E = maximum coating solids usage, in pounds per hour X (1-TE) (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 60%)

CE = control efficiency of the control equipment (assumed to be 70%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

The TPY limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will

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also be shown with the annual limitation.

**VI. Miscellaneous Requirements**

None