



Environmental Protection Agency

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

7/30/2012

Joel Feyedelem
Sandusky International, Inc
615 W MARKET ST
SANDUSKY, OH 44870

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0322020117
Permit Number: P0109733
Permit Type: Initial Installation
County: Erie

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NWDO

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG



Response to Comments

Facility ID:	0322020117
Facility Name:	Sandusky International, Inc
Facility Description:	Metal Industries.
Facility Address:	615 W MARKET ST Sandusky, OH 44870 Erie County
Permit:	P0109733, Permit-To-Install and Operate - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Sandusky Register on 06/15/2012. The comment period ended on 07/15/2012.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

- a. Comment: Page 38 of 46, the SO2 limit should be 0.035, not 0.35 from P901 and P902 each.
- b. Response: The requested change has been made.

2. Topic: None

- a. Comment: Is there guidance on doing the visible emissions evaluations (daily log) during nighttime operations?
- b. Response: At the time we issued the draft permit, we were unaware that Sandusky International did most of their melting at night, so we put in daily visible emissions checks to ensure ongoing compliance with the particulate and opacity limits. There are no provisions or guidance for conducting visible emission checks during night time hours; therefore, visible emissions checks are not appropriate for ensuring ongoing compliance. The company has one of two options: daily pressure drop readings or bag leak detection systems on each baghouse. If a manufacture's range cannot be established, the facility will have to conduct emissions testing to establish a range. Currently, there is no testing in the permit, but it may have to be added if a range needs to be established.

The company responded indicating that they would like to perform daily pressure drop readings for emission units P901 through P908, and P914. The use of daily visible emission checks for the remaining emission units was acceptable. The company supplied pressure drop ranges for emission units P901 through P908 and P914. The monitoring and recordkeeping for emission units P901 through P908 and P914 were changed from daily visible emission checks to daily pressure drop checks.

3. Topic: None

- a. Comment: Has there been any interest in a public meeting?
- b. Response: There has been no interest in a public meeting.



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Sandusky International, Inc**

Facility ID:	0322020117
Permit Number:	P0109733
Permit Type:	Initial Installation
Issued:	7/30/2012
Effective:	7/30/2012
Expiration:	4/25/2017



Division of Air Pollution Control
Permit-to-Install and Operate
for
Sandusky International, Inc

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator?..... 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions 10
1. F013, Ingot Machine 11
2. P907, Pouring and Cooling Operations 16
3. P908, Finishing Operation..... 22
4. P914, Shakeout Operation..... 28
5. Emissions Unit Group -Group #1 Furnaces: P901, P902, P903, P904, P905, and P906..... 34

Authorization

Facility ID: 0322020117
Application Number(s): A0044122
Permit Number: P0109733
Permit Description: The facility requested federally-enforceable restrictions to limit emissions in order to avoid being a Title V facility. This permit serves to re-permit the facility as a FEPTIO.
Permit Type: Initial Installation
Permit Fee: \$8,000.00
Issue Date: 7/30/2012
Effective Date: 7/30/2012
Expiration Date: 4/25/2017
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Sandusky International, Inc
615 W MARKET ST
Sandusky, OH 44870

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

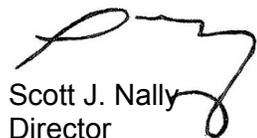
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0109733
Permit Description: The facility requested federally-enforceable restrictions to limit emissions in order to avoid being a Title V facility. This permit serves to re-permit the facility as a FEPTIO.

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

- Emissions Unit ID: F013
Company Equipment ID: F013
Superseded Permit Number:
General Permit Category and Type: Not Applicable
Emissions Unit ID: P907
Company Equipment ID: P907
Superseded Permit Number:
General Permit Category and Type: Not Applicable
Emissions Unit ID: P908
Company Equipment ID: P908
Superseded Permit Number:
General Permit Category and Type: Not Applicable
Emissions Unit ID: P914
Company Equipment ID: P914
Superseded Permit Number: P0024546
General Permit Category and Type: Not Applicable

Group Name: Group #1 Furnaces

Table with 2 columns: Emissions Unit ID and details (Company Equipment ID, Superseded Permit Number, General Permit Category and Type). Rows include units P901 through P906.

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a

renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

Final Permit-to-Install and Operate

Sandusky International, Inc

Permit Number: P0109733

Facility ID: 0322020117

Effective Date: 7/30/2012

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The Ohio EPA has determined that this facility may be applicable to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.

The area source MACT/GACT rules that may be applicable include 40 CFR, Part 63, Subpart ZZZZZ (Area Sources Iron and Steel Foundries) and 40 CFR Part 63, Subpart XXXXXX (Metal Fabrication & Finishing Source Nine Categories).

C. Emissions Unit Terms and Conditions

1. F013, Ingot Machine

Operations, Property and/or Equipment Description:

Ingot Machine

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)a., b)(2)a., b)(2)b., c)(1), d)(1), e)(1), f)(1)a. and f)(1)b.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	42.00 tons of fugitive PM10 per rolling, 12-month period. Visible fugitive emissions shall no exceed 20% opacity, as a three-minute average, from the egress points (i.e. building windows, doors, roof monitors, etc.) serving this emission unit. See b)(2)a., and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)	See b)(2)c.
c.	OAC rule 3745-17-07(B)	See b)(2)d.
d.	OAC rule 3745-17-08(B)	See b)(2)e.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2):
 - i. 42.00 tons of PM10 per rolling, 12-month period;
 - ii. Visible fugitive PE shall not exceed 20% opacity, as a three-minute average, from the egress points (i.e., building, windows, doors, roof, monitors, etc.) serving this emissions unit.
- b. All PM10 emissions are particulate emissions.
- c. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with OAC rule 3745-31-05(D) and compliance with the terms and conditions of this permit.
- d. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- e. This emissions unit is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit potential to emit [See b)(2)a.]:
 - a. The maximum annual metal throughput for this emissions unit shall not exceed 19,999 tons, based upon a rolling, 12-month summation of the metal throughput rates.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit. The maximum annual production rate for this emissions unit shall not exceed 19,999 tons/year, based upon a rolling, 12-month summation of the production rates.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the metal throughput rate for each month, in tons; and
 - b. the rolling, 12-month summation of the metal throughput rates, in tons.

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

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d)(2)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month metal throughput rate limitation.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to

March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall also identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.
- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

42.00 tons of PM10 per rolling, 12-month period

Applicable Compliance Method:

The rolling, 12-month emission limitation was developed by multiplying the maximum annual metal throughput rate of 19,999 tons by an emission factor of 4.2* lbs PM10/ton, from AP-42, Chapter 12.13-2 (1/95), and then dividing by a factor of 2000 lbs per ton. Therefore, provided compliance is shown with the rolling, 12-month metal throughput production limitation, compliance with the rolling, 12-month period emission limitation shall also be demonstrated.

*This emission factor was determined by adding the emission factor for pouring and casting operations which is 2.8 lbs/ton and the emission factor for casting cooling operations which is 1.4 lbs/ton.

b. Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity, as a three-minute average from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.

Final Permit-to-Install and Operate

Sandusky International, Inc

Permit Number: P0109733

Facility ID: 0322020117

Effective Date: 7/30/2012

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

2. P907, Pouring and Cooling Operations

Operations, Property and/or Equipment Description:

Pouring and Cooling Operations

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)a., b)(2)a., b)(2)b., c)(1), c)(2), d)(1), e)(1) and f)(1)a. through f)(1)e.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	0.49 lb particulate matter less than 10 microns in size (PM10)/hr from the baghouse stack 0.38 ton of PM10 per rolling, 12-month period Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, from the baghouse exhaust stack. 4.20 tons of fugitive PM10 per rolling, 12-month period Visible fugitive PE shall not exceed 20% opacity, as a three-minute average from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.

Final Permit-to-Install and Operate

Sandusky International, Inc

Permit Number: P0109733

Facility ID: 0322020117

Effective Date: 7/30/2012

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-08(B)	See b)(2)d.
c.	OAC rule 3745-17-07(A)	See b)(2)e.
d.	OAC rule 3745-17-07(B)	See b)(2)c.
e.	OAC rule 3745-17-11(B)	See b)(2)e.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2):
 - i. 0.49 lb PM10/hr, from the baghouse stack;
 - ii. 0.38 ton of PM10 per rolling, 12-month period;
 - iii. Visible PE shall not exceed 20% opacity, as a 6-minute average, from the baghouse exhaust stack;
 - iv. 4.20 tons of fugitive PM10 per rolling, 12-month period; and
 - v. Visible fugitive PE shall not exceed 20% opacity, as a three-minute average, from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.
- b. All PM10 emissions are particulate emissions.
- c. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- d. This emissions unit is not located within an "Appendix A" areas a identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- e. This emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit potential to emit [See b)(2)a.]:
 - a. This emission unit shall be vented to a baghouse (SR-2162) capable of achieving a 90% capture and a 99% control efficiency.

- (2) The maximum annual metal throughput for this emissions unit shall not exceed 19,999 tons, based upon a rolling, 12-month summation of the metal throughput rates.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit. The maximum annual production rate for this emissions unit shall not exceed 19,999 tons/year, based upon a rolling, 12-month summation of the production rates.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of the following information:
- a. The metal throughput rate for each month, in tons; and
 - b. the rolling, 12-month summation of the metal throughput rates, in tons.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 2.5 to 6.5 inches of water.
- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month metal throughput rate limitation.
 - ii. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - iii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

Final Permit-to-Install and Operate

Sandusky International, Inc

Permit Number: P0109733

Facility ID: 0322020117

Effective Date: 7/30/2012

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

0.49 lb PM10/hr from the baghouse stack

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of this emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on multiplying the maximum casting throughput rate of 13.0 tons/hr by an emission factor of 4.20 lbs PM10/ton (AP-42 Table 12-13-2 [1/95]), then applying a 90% capture rate and a 99% control efficiency.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

b. Emission Limitation:

0.38 ton of PM10 per rolling, 12-month period

Applicable Compliance Method:

The rolling, 12-month period emission limitation was developed by multiplying the maximum annual metal throughput rate of 19,999 tons by an emission factor of

4.20 lbs PM10/ton (AP-42 Table 12-13-2 [1/95]), applying a 90% capture rate and a 99% control efficiency, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the rolling, 12-month metal throughput production restriction, compliance with the rolling, 12-month period emission limitation shall also be demonstrated.

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, from the baghouse stack.

Applicable Compliance Method:

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

d. Emission Limitation:

4.20 tons of fugitive PM10 per rolling, 12-month period

Applicable Compliance Method:

The rolling, 12-month period emission limitation was developed by multiplying the maximum annual metal throughput rate of 19,999 tons by an emission factor of 4.20 lbs PM10/ton (AP-42 Table 12-13-2 [1/95]), applying a 10% capture inefficiency rate, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the rolling, 12-month metal throughput production restriction, compliance with the rolling, 12-month period emission limitation shall also be demonstrated.

e. Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity, as a three-minute average, from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

3. P908, Finishing Operation

Operations, Property and/or Equipment Description:

Wire Brush Grind and Abrasive Cutoff

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)a., b)(2)a., b)(2)b., c)(1), c)(2), d)(1), e)(1), and f)(1)a. through f)(1)e.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	0.99lbparticulate matter less than 10 microns in size (PM10)/hr from the baghouse exhaust stack 0.15 ton of PM10 per rolling, 12-month period Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, from the baghouse exhaust stack. 1.70 tons of fugitive PM10 per rolling, 12-month period Visible fugitive PE shall not exceed 20% opacity, as a three-minute average from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)e.
c.	OAC rule 3745-17-08(B)	See b)(2)d.
d.	OAC rule 3745-17-07(B)	See b)(2)c.
e.	OAC rule 3745-17-11(B)	See b)(2)e.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2):
 - i. 0.99 lb PM10/hr from the baghouse stack;
 - ii. 0.15 ton of PM10 per rolling, 12-month period;
 - iii. Visible PE shall not exceed 20% opacity, as a 6-minute average, from the baghouse exhaust stack;
 - iv. 1.70 tons of fugitive PM10 per rolling, 12-month period; and
 - v. Visible fugitive PE shall not exceed 20% opacity, as a three-minute average, from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.
- b. All PM10 emissions are particulate emissions.
- c. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- d. This emissions unit is not located within an "Appendix A" areas a identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- e. This emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit potential to emit [See b)(2)a.]:
 - a. This emission unit shall be vented to a baghouse (SR-2162) capable of achieving a 90% capture and a 99% control efficiency.

- (2) The maximum annual metal throughput for this emissions unit shall not exceed 19,999 tons, based upon a rolling, 12-month summation of the metal throughput rates.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit. The maximum annual production rate for this emissions unit shall not exceed 19,999 tons/year, based upon a rolling, 12-month summation of the production rates.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of the following information:
- a. The metal throughput rate for each month, in tons; and
 - b. the rolling, 12-month summation of the metal throughput rates, in tons.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 2.5 and 6.5 inches of water.
- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- ej. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month metal throughput rate limitation.
 - ii. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - ii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

0.99 lb PM10/hr from the baghouse stack

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of this emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on multiplying the maximum casting throughput rate of 65.0 tons/hr by an emission factor of 1.70 lbs PM10/ton (AP-42 Table 12-13-2 [1/95]), then applying a 90% capture rate and a 99% control efficiency.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

b. Emission Limitation:

0.15 ton of PM10 per rolling, 12-month period

Applicable Compliance Method:

The rolling, 12-month period emission limitation was developed by multiplying the maximum annual metal throughput rate of 19,999 tons by an emission factor of

1.7 lbs PM10/ton (AP-42 Table 12-13-2 [1/95]), applying a 90% capture rate and a 99% control efficiency, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the rolling, 12-month metal throughput production restriction, compliance with the rolling, 12-month period emission limitation shall also be demonstrated.

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, from the baghouse stack.

Applicable Compliance Method:

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

d. Emission Limitation:

1.70 tons of fugitive PM10 per rolling, 12-month period

Applicable Compliance Method:

The rolling, 12-month period emission limitation was developed by multiplying the maximum annual metal throughput rate of 19,999 tons by an emission factor of 1.70 lbs PM10/ton (AP-42 Table 12-13-2 [1/95]), applying a 10% capture inefficiency rate, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the rolling, 12-month metal throughput production restriction, compliance with the rolling, 12-month period emission limitation shall also be demonstrated.

e. Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity, as a three-minute average, from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

4. P914, Shakeout Operation

Operations, Property and/or Equipment Description:

Shakeout Operation

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)a., b)(2)a., b)(2)b., c)(1), c)(2), d)(1), e)(1), and f)(1)a. through f)(1)e.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	0.94 lb particulate matter less than 10 microns in size (PM10)/hr from the baghouse exhaust stack 0.29 ton of PM10 per rolling, 12-month period Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, from the baghouse exhaust stack 3.20 tons of fugitive PM10 per rolling, 12-month period Visible fugitive PE shall not exceed 20% opacity, as a three-minute average, from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a. and b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)e.
c.	OAC rule 3745-17-08(B)	See b)(2)d.
d.	OAC rule 3745-17-07(B)	See b)(2)c.
e.	OAC rule 3745-17-11(B)	See b)(2)e.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2):
 - i. 0.94 lb PM10/hr from the baghouse stack;
 - ii. 0.29 ton of PM10 per rolling, 12-month period;
 - iii. Visible PE shall not exceed 20% opacity, as a 6-minute average, from the baghouse exhaust stack;
 - iv. 3.20 tons of fugitive PM10 per rolling, 12-month period; and
 - v. Visible fugitive PE shall not exceed 20% opacity, as a three-minute average, from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.
- b. All PM10 emissions are particulate emissions.
- c. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- d. This emissions unit is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- e. This emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit potential to emit [See b)(2)a.]:
 - a. This emission unit shall be vented to a baghouse (SR-2162) capable of achieving a 90% capture and a 99% control efficiency.

- (2) The maximum annual metal throughput for this emissions unit shall not exceed 19,999 tons, based upon a rolling, 12-month summation of the metal throughput rates.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit. The maximum annual production rate for this emissions unit shall not exceed 19,999 tons/year, based upon a rolling, 12-month summation of the production rates.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
- a. the metal throughput rate for each month, in tons; and
 - b. the rolling, 12-month summation of the metal throughput rates, in tons.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 2.5 to 6.5 inches of water.
- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month metal throughput rate limitation.
 - ii. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - iii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

0.94 lb PM10/hr from the baghouse stack

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of this emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on multiplying the maximum casting throughput rate of 32.5 tons/hr by an emission factor of 3.20 lbs PM10/ton (AP-42 Table 12-10-7 [1/95]), then applying a 90% capture rate and a 99% control efficiency.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

b. Emission Limitation:

0.29 ton of PM10 per rolling, 12-month period

Applicable Compliance Method:

The rolling, 12-month period emission limitation was developed by multiplying the maximum annual metal throughput rate of 19,999 tons by an emission factor of

3.20 lbs PM10/ton (AP-42 Table 12-10-7 [1/95]), applying a 90% capture rate and a 99% control efficiency, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the rolling, 12-month metal throughput production restriction, compliance with the rolling, 12-month period emission limitation shall also be demonstrated.

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, from the baghouse stack.

Applicable Compliance Method:

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

d. Emission Limitation:

3.20 tons of fugitive PM10 per rolling, 12-month period

Applicable Compliance Method:

The rolling, 12-month period emission limitation was developed by multiplying the maximum annual metal throughput rate of 19,999 tons by an emission factor of 3.20 lbs PM10/ton (AP-42 Table 12-10-7 [1/95]), applying a 10% capture inefficiency rate, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the rolling, 12-month metal throughput production restriction, compliance with the rolling, 12-month period emission limitation shall also be demonstrated.

e. Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity, as a three-minute average, from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -Group #1Furnaces: P901, P902, P903,P904,P905, and P906

EU ID Operations, Property and/or Equipment Description

P901	EAF SR 2052 - 6000 #/hr Electric Arc Furnace
P902	EAF SR 2053 - 6000 #/hr Electric Arc Furnace
P903	Electric Induction Furnace #3
P904	Electric Induction Furnace #4
P905	Electric Induction Furnace #5
P906	Electric Induction Furnace #6

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a., b)(2)a., b)(2)b., c)(1) and c)(2), d)(1), e)(1), and f)(1)a. through f)(1)i.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	1.17 tons of particulate matte less than 10 microns in size (PM10) per rolling, 12-month period from emission units P901-P906 combined 13.0 tons of fugitive PM10 per rolling, 12-month period from emission units P901-P906 combined 0.41 lb PM10/hour from the baghouse stack from P901 and P902, individually. 0.34 lb PM10/hour from the baghouse stacks from P903

Final Permit-to-Install and Operate

Sandusky International, Inc

Permit Number: P0109733

Facility ID: 0322020117

Effective Date: 7/30/2012

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>0.25 lb PM10/hour from the baghouse stacks from P904, P905, and P906, individually.</p> <p>Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, from the baghouse stacks serving these emissions units</p> <p>Visible fugitive PE shall not exceed 20% opacity as a three-minute average from the egress points (i.e., building windows, doors, roof monitors, etc.) serving these emissions units</p> <p>0.035 lb of sulfur dioxide (SO₂)/hour from P901 and P902, individually</p> <p>0.70 lb of nitrogen oxides (NO_x)/hour from P901 and P902, individually</p> <p>3.5 lbs of carbon monoxide (CO)/hour from P901 and P902, individually</p> <p>1.05lbs of volatile organic compounds (VOC)/hour from P901 and P902, individually</p> <p>1.00 tons SO₂ per rolling, 12-month period from emissions units P901 and P902 combined</p> <p>2.00 tons NO_x per rolling, 12-month period from emissions units P901 and P902 combined</p> <p>10.0 tons CO per rolling, 12-month period from emissions units P901 and P902 combined</p> <p>3.00 tons VOC per rolling, 12-month period from emissions units P901 and P902</p> <p>See b)(2)a. and b)(2)b.</p>
b.	OAC rule 3745-31-05(A)(3)	See b)(2)c.

Final Permit-to-Install and Operate

Sandusky International, Inc

Permit Number: P0109733

Facility ID: 0322020117

Effective Date: 7/30/2012

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-08(B)	See b)(2)e.
d.	OAC rule 3745-17-07(B)	See b)(2)d.
e.	OAC rule 3745-17-11(B)	See b)(2)f.
f.	OAC rule 3745-17-07(A)	See b)(2)f.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and c)(2):
- i. 1.17 tons of PM10 combined per rolling, 12-month period from emissions units P901-P906 combined;
 - ii. 13.0 tons of fugitive PM10 combined per rolling, 12-month period from emission units P901-P906 combined;
 - iii. 0.41 lb PM10/hr from the baghouse stacks from P901 and P902, individually;
 - iv. 0.34 lb PM10/hr from the baghouse stacks from P903;
 - v. 0.25 lb PM10/hr from the baghouse stacks from P904, P905, and P906, individually;
 - vi. Visible PE shall not exceed 20% opacity, as a 6-minute average, from the baghouses exhaust stacks;
 - vii. Visible fugitive PE shall not exceed 20% opacity, as a three-minute average, from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit;
 - viii. 0.035 lb SO₂/hr from P901 and P902, individually;
 - ix. 0.70 lb NO_x/hr from P901 and P902, individually;
 - x. 3.5 lbs CO/hr from P901 and P902, individually;
 - xi. 1.05 lbs VOC/hr from P901 and P902, individually;
 - xii. 1.00 tons SO₂ per rolling, 12-month period from emissions units P901 and P902 combined;
 - xiii. 2.00 tons NO_x per rolling, 12-month period from emissions units P901 and P902 combined;
 - xiv. 10.0 tons CO per rolling, 12-month period from emissions units P901 and P902 combined; and

- xv. 3.00 tons VOC combined per rolling, 12-month period from emissions units P901 and P902 combined.
 - b. All PM10 emissions are particulate emissions.
 - c. Best Available Technology (BAT) requirements for these emissions unit have been determined to be the use of baghouses, compliance with OAC rule 3745-31-05(D) and compliance with the terms and conditions of this permit.
 - d. These emissions units are exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)e.
 - e. This emissions unit is not located within an "Appendix A" area identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
 - f. This emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).
- c) Operational Restrictions
- (1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit potential to emit [See b)(2)a.]:
 - a. Emission units P901 and P902 shall be vented to baghouses (SR-2165 and SR-2166, respectively) capable of achieving a 90% capture and a 99% control efficiency. Emission units P903, P904, P905 and P906 shall be vented to baghouses (SR-2165 and SR-2166) capable of achieving a 90% capture and 99% control efficiency.
 - (3) The maximum annual metal throughput for this emissions unit shall not exceed 19,999 tons, based upon a rolling, 12-month summation of the metal throughput rates.

These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit. The maximum annual production rate for this emissions unit shall not exceed 19,999 tons/year, based upon a rolling, 12-month summation of the production rates.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the following information:
 - a. the metal throughput rate for each month, in tons; and
 - b. the rolling, 12-month summation of the metal throughput rates, in tons.
 - (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drops across baghouses SR-2165 and SR-2166 are between 2 to 8 inches of water.

- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouses when the controlled emissions units are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouses on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouses are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the

allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month metal throughput rate limitation.
 - ii. each period of time (start time and date, and end time and date) when the pressure drop across the baghouses were outside of the acceptable range;
 - iii. any period of time (start time and date, and end time and date) when the emissions units were in operation and the process emissions were not vented to the baghouses;
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

1.17 tons of PM10 per rolling, 12-month period from emissions units P901-P906, combined

Applicable Compliance Method:

The rolling, 12-month period emission limitation was developed by multiplying the maximum annual metal throughput rate of 19,999 tons by an emission factor of 13.0 lbs PM10/ton (AP-42 Table 12-13-2 [1/95]*), applying a 90% capture rate and a 99% control efficiency, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the rolling, 12-month metal throughput production restriction, compliance with the rolling, 12-month period emission limitation shall also be demonstrated.

*the combined limit was based on worst case scenario emission factors from electric arc furnaces versus induction furnaces.

b. Emission Limitation:

13.0 tons of fugitive PM10 per rolling, 12-month period from emissions units P901-P906 combined.

Applicable Compliance Method:

The rolling, 12-month period emission limitation was developed by multiplying the maximum annual metal throughput rate of 19,999 tons by an emission factor of 13.0 lbs PM10/ton (AP-42 Table 12-13-2 [1/95]*), applying a 10 percent capture inefficiency rate, then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the rolling, 12-month metal throughput production restriction, compliance with the rolling, 12-month period emission limitation shall also be demonstrated.

*the combined limit was based on worst case scenario emission factors from electric arc furnaces versus induction furnaces.

c. Emission Limitation:

0.41 lb PM10/hr from the baghouse stacks from P901 and P902, individually

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of this emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on multiplying the maximum casting throughput rate of 3.5 tons/hr by an emission factor of 13.0 lbs PM10/ton (AP-42 Table 12-13-2 [1/95]), then applying a 90% capture rate and a 99% control efficiency.

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

d. Emission Limitation:

0.34 lb PM10/hr from the baghouse stacks from P903

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of this emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on multiplying the maximum casting throughput rate of 1.7 tons/hr by an emission factor of 0.20 lbs PM10/ton (AP-42 Table 12-10-3 [1/95]).

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

e. Emission Limitation:

0.25 lb PM10/hr from the baghouse stacks from P904, P905, and P906, individually

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of this emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on multiplying the maximum casting throughput rate of 1.25 tons/hr by an emission factor of 0.20 lbs PM10/ton (AP-42 Table 12-10-3 [1/95]).

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

f. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, from the baghouse stacks serving these emissions units.

Applicable Compliance Method:

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

g. Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity, as a three-minute average, from the egress points (i.e., building windows, doors, roof monitors, etc.) serving these emissions units.

Applicable Compliance Method:

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

h. Emission Limitation:

0.035 lb SO₂/hr from P901 and P902 individually, 0.7 lb NO_x/hr from P901 and P902 individually, 3.5 lbs CO/hr from P901 and P902 individually, and 1.05 lbs VOC/hr from P901 and P902 individually

Applicable Compliance Method:

The hourly emission limitations represent the potentials to emit* for these emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on multiplying the maximum casting throughput rate of 3.5 tons/hr by an emission factor of 0.01 lb SO₂/ton, emission factor of 1.00 lb CO/ton, emission factor of 0.30 lb VOC/ton using AP-42 Table 12-10-5(1/95) and by an emission factor of 0.20 lb NO_x/ton using AP-42 Table 12-13-2 (1/95).

If required, the permittee shall demonstrate compliance with the hourly emission limitations by testing in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A for NO_x; with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A for CO; Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A for SO₂; and Methods 1-4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A for VOC. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

i. Emission Limitations:

1.00 ton SO₂ per rolling, 12-month period from emissions units P901 and P902 combined, 2.00 tons NO_x per rolling, 12-month period from emissions units P901 and P902 combined, 10.0 tons CO per rolling, 12-month period from emissions

Final Permit-to-Install and Operate

Sandusky International, Inc

Permit Number: P0109733

Facility ID: 0322020117

Effective Date: 7/30/2012

units P901 and P902 combined, 3.00 tons VOC per rolling, 12-month period from emissions units P901 and P902 combined.

Applicable Compliance Method:

The rolling, 12-month period emission limitations were developed by multiplying the maximum annual metal throughput rate of 19,999 tons by an emission factor of 0.01 lb SO₂/ton, emission factor of 1.00 lb CO/ton, emission factor of 0.30 lb VOC/ton using AP-42 Table 12-10-5(1/95) and by an emission factor of 0.20 lb NO_x/ton using AP-42 Table 12-13-2 (1/95), then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the rolling, 12-month metal throughput production restriction, compliance with the rolling, 12-month period emission limitation shall also be demonstrated.

g) Miscellaneous Requirements

(1) None.