



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 03-17197

Fac ID: 0333010042

DATE: 6/10/2008

Kenton Iron Products, Inc.
Renee Harmeyer
P.O. Box 105 347 Vine Street
Kenton, OH 43015

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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 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

Sincerely,

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

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 6/10/2008
Effective Date: 6/10/2008**

FINAL PERMIT TO INSTALL 03-17197

Application Number: 03-17197
Facility ID: 0333010042
Permit Fee: **\$13000**
Name of Facility: Kenton Iron Products, Inc.
Person to Contact: Renee Harmeyer
Address: P.O. Box 105 347 Vine Street
Kenton, OH 43015

Location of proposed air contaminant source(s) [emissions unit(s)]:
**13917 Vision Drive
Kenton, Ohio**

Description of proposed emissions unit(s):
To be determined by county engineer.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

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Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

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the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

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13. Source Operation and Operating Permit Requirements After Completion of Construction

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

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

	<u>Pollutant</u>	<u>Tons Per Year</u>
F001	PE	6.76
F002	PE	5.20
	VOC	4.95
F003	PE	3.96
F004	VOC	23.49

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F005	VOC	4.19
F006	VOC	5.90
F007	PE	4.46
P001	VOC	39.77
P002	VOC	2.51
P003	PM10	0.13
PE Total		20.38
PM10 Total		0.13
VOC Total		80.81

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment -(F001) - Two Inductotherm 1.875 ton induction furnaces for gray and ductile iron: charging, melting, tapping and inoculation

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 5.76 lb/hr. Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average from any non-stack egress point. See Part III.A.I.2.a and A.II.1 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
OAC rule 3745-31-05(C) (Voluntary synthetic minor limitation to avoid major source applicability thresholds)	See Part III.A.I.2.b, A.II.1 and, A.II.2 below.
OAC rule 3745-17-07(B)	See Part III.A.I.2.c below.
OAC rule 3745-17-08(B)	See Part III.A.I.2.d below.

2. Additional Terms and Conditions

- 2.a The 5.76 lb PE/hr emission limitation was written to reflect the potential to emit of this emissions unit. Therefore, record keeping and reporting requirements are not necessary to demonstrate compliance with this emission limitation.
- 2.b PE from emission units F001 shall not exceed 6.76 tons per rolling, 12-month period.
- 2.c Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.d Since this emissions unit is not located in an Appendix A area, pursuant to

Emissions Unit ID: F001

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

II. Operational Restrictions

1. The maximum amount of metal melted shall not exceed 8250 tons per rolling, 12-month summation, based upon a rolling, 12-month summation of the metal melting rate.
2. The maximum amount of metal inoculated shall not exceed 5800 tons per rolling, 12-month summation, based upon a rolling, 12-month summation of the metal melting rate.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the total metal melted, in tons, in emission unit F001;
 - b. the total metal inoculated, in tons, in emission unit F001;
 - c. the rolling, 12-month summation of the total metal melted, in tons, from emission unit F001;
 - d. the rolling, 12-month summation of the total metal inoculated, in tons, from emission unit F001; and
 - e. the rolling, 12-month summation of the total particulate emissions, in tons, from emission unit $[(a*(4.2 \text{ lbs PE/ton}) + b*(1.8 \text{ lbs PE/ton}))(\text{building control efficiency}(1-.70))]$.
2. The permittee shall perform daily checks, when the emissions unit is charged or tapped during day light and when the weather conditions allow, for visible fugitive particulate emissions from the non-stack egress points from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, ventilation openings and windows. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location 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 visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which note the following:

Emissions Unit ID: F001

- a. identify all days during which visible fugitive particulate emissions were observed from any non-stack egress point from the building housing this emissions unit;
- b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions from the building housing this emissions unit;
- c. all exceedances of the rolling, 12-month summation limitation for total metal melted, in tons, from emission unit F001;
- d. all exceedances of the rolling, 12-month summation limitation for total metal inoculated, in tons, from emission unit F001; and
- e. all exceedances of the rolling, 12-month summation limitation for total particulate emissions, in tons, from emission units F001.

These reports are due by the date described in Part I - General Terms and Conditions of this permit under Section A.

V. Testing Requirements

- a. Emission Limitation:
PE shall not exceed 5.76 lbs/hr

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the maximum capacity of 3.20 tons of metal melted per hour by the emission factor of 4.2 pounds of PE per ton of metal melted (AP-42, Ch 12.10, for charging, melting, tapping and inoculation, 01/95) by the control efficiency of the building structure (1-0.70, from SIP development)).

- b. Emission Limitation:
Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average from any non-stack egress point.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

- c. Emission Limitation:
PE from emission units F001 shall not exceed 6.76 tons per rolling, 12-month period.

Applicable Compliance Method:

See Part III.A.III.1 above.

Emissions Unit ID: F001

Issued: 6/10/2008

VI. Miscellaneous Requirements

None

Issued: 6/10/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (F001) - Two Inductotherm 1.875 ton induction furnaces for gray and ductile iron: charging, melting, tapping and inoculation

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(F002) - Casting pouring and cooling area

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 4.03 lb/hr. Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average from any non-stack egress point. See Part III.A.I.2.a and A.II.1 below. Volatile organic compounds (VOC) shall not exceed 3.84 lbs/hr and 4.95 tons/year The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
OAC rule 3745-31-05(C) (Voluntary synthetic minor limitation to avoid major source applicability thresholds)	See Part III.A.I.2.b and A.II.1 below.
OAC rule 3745-17-07(B)	See Part III.A.I.2.c below.
OAC rule 3745-17-08(B)	See Part III.A.I.2.d below.

2. Additional Terms and Conditions

- 2.a The 4.03 lb PE/hr and 3.84 lb VOC/hr emission limitations were written to reflect the potential to emit of this emissions unit. Therefore, record keeping and reporting requirements are not necessary to demonstrate compliance with these emission limitations.
- 2.b PE from emission units F002 shall not exceed 5.20 tons per rolling, 12-month period.

Issued: 6/10/2008

- 2.c** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.d** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

II. Operational Restrictions

- 1. The maximum amount of metal poured shall not exceed 8250 tons per rolling, 12-month summation, based upon a rolling, 12-month summation of the metal pouring rate.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records of the following information:
 - a. the total metal poured, in tons, in emission unit F002;
 - b. the rolling, 12-month summation of the total metal poured, in tons, from emission unit F002;
 - c. the rolling, 12-month summation of the total particulate emissions, in tons, from emission unit F002 $[(A.III.1.a) \times (4.2 \text{ lbs PE/ton}) \times (\text{building control efficiency}(1-.70))]$.
- 2. The permittee shall perform daily checks, when the emissions unit is pouring during day light and when the weather conditions allow, for visible fugitive particulate emissions from the non-stack egress points from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, ventilation openings and windows. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location 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 visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

Issued: 6/10/2008

1. The permittee shall submit deviation (excursion) reports which note the following:
 - a. identify all days during which visible fugitive particulate emissions were observed from any non-stack egress point from the building housing this emissions unit;
 - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions from the building housing this emissions unit;
 - c. all exceedances of the rolling, 12-month summation limitation for total metal poured, in tons, from emission unit F002;
 - d. all exceedances of the hourly limitation for total particulate emissions, in pounds, from emission units F002.
 - e. all exceedances of the rolling, 12-month summation limitation for total particulate emissions, in tons, from emission units F002.

These reports are due by the date described in Part I - General Terms and Conditions of this permit under Section A.

V. Testing Requirements

- a. Emission Limitation:
PE shall not exceed 4.03 lbs/hr

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the maximum capacity of 3.20 tons of metal melted per hour by the emission factor of 4.2 pounds of PE per ton of metal poured (AP-42, Ch 12.10, table 12-10.7, 01/95) by the control efficiency of the building structure, (1-0.70), from SIP development.

- b. Emission Limitation:
Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average from any non-stack egress point.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

Emissions Unit ID: F002

- c. Emission Limitation:
PE from emission units F002 shall not exceed 5.20 tons per rolling, 12-month period.
- Applicable Compliance Method:
See Part III.A.III.1 above.
- d. Emission Limitation:
Volatile organic compounds (VOC) shall not exceed 3.84 lbs/hr
- Applicable Compliance Method:
Compliance may be demonstrated by multiplying the maximum capacity of 3.20 tons of metal melted per hour by the emission factor of 1.2 pounds of VOC per ton of metal poured (from AIRS (1990) and FIRE v6.23, SCC 3-04-003-31).
- e. Emission Limitation:
Volatile organic compounds (VOC) shall not exceed 4.95 tons/year
- Applicable Compliance Method:
Compliance may be demonstrated by multiplying the maximum annual metal pouring restriction of 8250 tons by the emission factor of 1.2 pounds of VOC per ton of metal poured (from AIRS (1990) and FIRE v6.23, SCC 3-04-003-31) and dividing by 2000 pounds per ton.

VI. Miscellaneous Requirements

None

Issued: 6/10/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(F002) - Casting pouring and cooling area

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(F003) - Casting Shakeout Floor

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 3.07 lb/hr.</p> <p>Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average from any non-stack egress point.</p> <p>See Part III.A.I.2.a and A.II.1 below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).</p>
OAC rule 3745-31-05(C) (Voluntary synthetic minor limitation to avoid major source applicability thresholds)	See Part III.A.I.2.b and A.II.1 below.
OAC rule 3745-17-07(B)	See Part III.A.I.2.c below.
OAC rule 3745-17-08(B)	See Part III.A.I.2.d below.

2. Additional Terms and Conditions

- 2.a The 3.07 lb PE/hr emission limitation was written to reflect the potential to emit of this emissions unit. Therefore, record keeping and reporting requirements are not necessary to demonstrate compliance with this emission limitation.
- 2.b PE from emission units F003 shall not exceed 3.96 tons per rolling, 12-month period.

Emissions Unit ID: F003

- 2.c Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.d Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

II. Operational Restrictions

- 1. The maximum amount of metal shook out shall not exceed 8250 tons per rolling, 12-month summation, based upon a rolling, 12-month summation of the shake out rate.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records of the following information:
 - a. the total metal shook out, in tons, in emission unit F003;
 - b. the rolling, 12-month summation of the total metal shook out, in tons, from emission unit F003;
 - c. the rolling, 12-month summation of the total particulate emissions, in tons, from emission unit F003 [(A.III.1.a)*(3.2 lbs PE/ton)*(building control efficiency(1-.70))].
- 2. The permittee shall perform daily checks, when the emissions unit is being shaken out during day light and when the weather conditions allow, for visible fugitive particulate emissions from the non-stack egress points from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, ventilation openings and windows. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location 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 visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which note the following:
 - a. identify all days during which visible fugitive particulate emissions were observed from any non-stack egress point from the building housing this emissions unit;

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- b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions from the building housing this emissions unit;
- c. all exceedances of the rolling, 12-month summation limitation for total metal shock out, in tons, from emission unit F003;
- d. all exceedances of the hourly limitation for total particulate emissions, in pounds, from emission unit F003.
- e. all exceedances of the rolling, 12-month summation limitation for total particulate emissions, in tons, from emission unit F003.

These reports are due by the date described in Part I - General Terms and Conditions of this permit under Section A.

V. Testing Requirements

- a. Emission Limitation:
PE shall not exceed 3.07 lbs/hr

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the maximum capacity of 3.20 tons of metal melted per hour by the emission factor of 3.2 pounds of PE per ton of metal poured (AP-42, Ch 12.10, table 12-10.7, 01/95) by the control efficiency of the building structure, (1-0.70), from SIP development.

- b. Emission Limitation:
Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average from any non-stack egress point.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

- c. Emission Limitation:
PE from emission units F002 shall not exceed 3.96 tons per rolling, 12-month period.

Applicable Compliance Method:

Kenton Iron Products, Inc.
DTI Application: 02 17107

Facility ID: 0333010042

Emissions Unit ID: F003

See Part III.A.III.1 above.

VI. Miscellaneous Requirements

None

Issued: 6/10/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(F003) - Casting Shakeout Floor

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 6/10/2008

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(F004) - Mold making operations (Mixer VMX 1) - Sand Mixer and mold filling

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 26.10 lbs/hr.</p> <p>The requirements of this rule also include compliance with OAC rule 3745-31-05(C).</p>
OAC rule 3745-31-05(C) (Voluntary synthetic minor limitation to avoid major source applicability thresholds)	<p>VOC emissions shall not exceed 23.49 tons per rolling, 12-month summation.</p> <p>See Part III.A.I.2.a below.</p>
OAC rule 3745-21-07(G)(2)	See Part III.A.I.2.b below.

2. Additional Terms and Conditions

- 2.a The 26.10 pounds per hour emission limitation was written to reflect the potential to emit of this emissions unit. Therefore, record keeping and reporting requirements are not necessary to demonstrate compliance with the emission limitation.
- 2.b This emission unit uses a phenolic urethane no-bake resin binder system in foundry core-making and mold-making operations. Therefore, pursuant to OAC rule 3745-21-07 (G)(9)(i), the requirements of OAC rule 3745-21-07(G)(2) do not apply to this emissions unit.

II. Operational Restrictions

Issued: 6/10/2008

1. The maximum amount of sand handled in this emissions unit shall not exceed 54,000 tons per rolling, 12-month summation, based upon a rolling, 12-month summation of the sand handling rate.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the tons of sand handled per hour;
 - b. the VOC emission rate, in lbs/ ton sand produced;
 - c. the VOC emissions, per hour (a x b);
 - d. the rolling, 12-month summation of the total sand handled, in tons, from emission unit F004, and;
 - e. the total VOC emission rate based on a rolling, 12-month summation, in tons, [c x 0.87 lbs VOC/ton of sand(Ohio EPA/OCMA study, "New emission factors for core/mold making operations Part I", 2/16/98) x 1 ton/2000 lbs].

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which note the following:
 - a. all exceedances of the hourly limitation for VOC emissions, in pounds, from emission unit F004.
 - b. all exceedances of the rolling, 12-month summation limitation for emission unit F004;
 - c. all exceedances of the rolling, 12-month summation limitation for sand handling, in tons, from emission unit F004.

These reports are due by the date described in Part I - General Terms and Conditions of this permit under Section A.

V. Testing Requirements

- a. Emission Limitation:
VOC emissions shall not exceed 26.10 lbs/hr.
- Applicable Compliance Method:
Compliance may be demonstrated by Part III.A.III.1.c above.
- b. Emission Limitation:
Total sand handled shall not exceed 54000 tons per year.
- Applicable Compliance Method:
Compliance may be demonstrated by Part III.A.III.1.d above.
- c. Emission Limitation:
VOC emissions shall not exceed 23.49 tons per rolling, 12-month summation.
- Applicable Compliance Method:
Compliance may be demonstrated by Part III.A.III.1.e above.

VI. Miscellaneous Requirements

None

Issued: 6/10/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (F004) - Mold making operations (Mixer VMX 1) - Sand Mixer and mold filling

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 6/10/2008

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(F005) - Core making operations (Mixer VMX 2) - Sand mixer and core filling

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 7.83 lbs/hr.</p> <p>The requirements of this rule also include compliance with OAC rule 3745-31-05(C).</p>
OAC rule 3745-31-05(C) (Voluntary synthetic minor limitation to avoid major source applicability thresholds)	<p>VOC emissions shall not exceed 4.19 tons per rolling, 12-month summation.</p> <p>See Part III.A.I.2.a and A.II.1 below.</p>
OAC rule 3745-21-07(G)(2)	See Part III.A.I.2.b below.

2. Additional Terms and Conditions

- 2.a The 7.83 pounds per hour emission limitation was written to reflect the potential to emit of this emissions unit. Therefore, record keeping and reporting requirements are not necessary to demonstrate compliance with the emission limitation.
- 2.b This emission unit uses a phenolic urethane no-bake resin binder system in foundry core-making and mold-making operations. Therefore, pursuant to OAC rule 3745-21-07 (G)(9)(i), the requirements of OAC rule 3745-21-07(G)(2) do not apply to this emissions unit.

II. Operational Restrictions

Issued: 6/10/2008

1. The maximum amount of sand handled in this emissions unit shall not exceed 9630 tons per rolling, 12-month summation, based upon a rolling, 12-month summation of the sand handling rate.

Issued: 6/10/2008

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the tons of sand handled per hour;
 - b. the VOC emission rate, in lbs/ ton sand produced;
 - c. the VOC emissions, per hour (a x b);
 - d. the rolling, 12-month summation of the total sand handled, in tons, from emission unit F005, and;
 - e. the total VOC emission rate based on a rolling, 12-month summation, in tons, [c x 0.87 lbs VOC/ton of sand(Ohio EPA/OCMA study, "New emission factors for core/mold making operations Part I", 2/16/98) x 1 ton/2000 lbs].

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which note the following:
 - a. all exceedances of the hourly limitation for VOC emissions, in pounds, from emission unit F005.
 - b. all exceedances of the rolling, 12-month summation limitation for emission unit F005;
 - c. all exceedances of the rolling, 12-month summation limitation for sand handling, in tons, from emission unit F005.

These reports are due by the date described in Part I - General Terms and Conditions of this permit under Section A.

V. Testing Requirements

- a. Emission Limitation:
VOC emissions shall not exceed 7.83 lbs/hr.

Applicable Compliance Method:

Emissions Unit ID: F005

Compliance may be demonstrated by Part III.A.III.1.c above.

b. Emission Limitation:

Total sand handled shall not exceed 9360 tons per year.

Applicable Compliance Method:

Compliance may be demonstrated by Part III.A.III.1.d above.

c. Emission Limitation:

VOC emissions shall not exceed 4.19 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance may be demonstrated by Part III.A.III.1.e above.

VI. Miscellaneous Requirements

None

Issued: 6/10/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (F005) - Core making operations (Mixer VMX 2) - Sand mixer and core filling

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 6/10/2008

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(F006) - Cold box chromite core making operations (Mixer VMX 3) - Sand Mixer and core filling

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 5.85 lbs/hr.</p> <p>The requirements of this rule also include compliance with OAC rule 3745-31-05(C).</p>
OAC rule 3745-31-05(C) (Voluntary synthetic minor limitation to avoid major source applicability thresholds)	<p>VOC emissions shall not exceed 2.77 tons per rolling, 12-month summation.</p> <p>See Part III.A.I.2.a and A.II.1 below.</p>
OAC rule 3745-21-07(G)(2)	See Part III.A.I.2.b below.

2. Additional Terms and Conditions

- 2.a The 5.85 pounds per hour emission limitation was written to reflect the potential to emit of this emissions unit. Therefore, record keeping and reporting requirements are not necessary to demonstrate compliance with the emission limitation.
- 2.b This emission unit uses a phenolic urethane no-bake resin binder system in foundry core-making and mold-making operations. Therefore, pursuant to OAC rule 3745-21-07 (G)(9)(i), the requirements of OAC rule 3745-21-07(G)(2) do not apply to this emissions unit.

Emissions Unit ID: F006

II. Operational Restrictions

1. The maximum amount of sand handled in this emissions unit shall not exceed 8532 tons per rolling, 12-month summation, based upon a rolling, 12-month summation of the sand handling rate.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the tons of sand handled per hour;
 - b. the VOC emission rate, in lbs/ ton sand produced;
 - c. the VOC emissions, per hour (a x b);
 - d. the rolling, 12-month summation of the total sand handled, in tons, from emission unit F006, and;
 - e. the total VOC emission rate based on a rolling, 12-month summation, in tons, [c x 0.65 lbs VOC/ton of sand(Ohio EPA/OCMA study, "New emission factors for core/mold making operations Part I", 2/16/98) x 1 ton/2000 lbs].

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which note the following:
 - a. all exceedances of the hourly limitation for VOC emissions, in pounds, from emission unit F006.
 - b. all exceedances of the rolling, 12-month summation limitation for emission unit F006;
 - c. all exceedances of the rolling, 12-month summation limitation for sand handling, in tons, from emission unit F006.

These reports are due by the date described in Part I - General Terms and Conditions of this permit under Section A.

V. Testing Requirements

- a. Emission Limitation:
VOC emissions shall not exceed 5.85 lbs/hr.

Applicable Compliance Method:

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Compliance may be demonstrated by Part III.A.III.1.c above.

b. Emission Limitation:

Total sand handled shall not exceed 8532 tons per year.

Applicable Compliance Method:

Compliance may be demonstrated by Part III.A.III.1.d above.

c. Emission Limitation:

VOC emissions shall not exceed 2.77 tons per rolling, 12-month summation.

Applicable Compliance Method:

Compliance may be demonstrated by Part III.A.III.1.e above.

VI. Miscellaneous Requirements

None

Issued: 6/10/2008

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(F006) - Cold box chromite core making operations (Mixer VMX 3) - Sand Mixer and core filling

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 6/10/2008

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(F007) - Finishing operations - cutting and grinding

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 3.46 lb/hr. Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average from any non-stack egress point. See Part III.A.I.2.a and A.II.1 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
OAC rule 3745-31-05(C) (Voluntary synthetic minor limitation to avoid major source applicability thresholds)	See Part III.A.I.2.b and A.II.1 below.
OAC rule 3745-17-07(B)	See Part III.A.I.2.c below.
OAC rule 3745-17-08(B)	See Part III.A.I.2.d below.

2. Additional Terms and Conditions

- 2.a The 3.46 lb PE/hr emission limitation was written to reflect the potential to emit of this emissions unit. Therefore, record keeping and reporting requirements are not necessary to demonstrate compliance with this emission limitation.
- 2.b PE from emission unit F007 shall not exceed 4.46 tons per rolling, 12-month period.

Emissions Unit ID: F007

- 2.c** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
- 2.d** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.

II. Operational Restrictions

- 1. The maximum amount of metal ground not exceed 8250 tons per rolling, 12-month summation, based upon a rolling, 12-month summation of the metal melting rate.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records of the following information:
 - a. the total metal ground, in tons, in emission unit F007, and;
 - b. the rolling, 12-month summation of the total metal ground, in tons, from emission unit F007;
 - c. the rolling, 12-month summation of the total particulate emissions, in tons, from emission unit [(a x (3.6 lbs PE/ton) x (building control efficiency(1-.70)))].
- 2. The permittee shall perform daily checks, when the emissions unit is charged or tapped during day light and when the weather conditions allow, for visible fugitive particulate emissions from the non-stack egress points from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways, ventilation openings and windows. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location 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 visible emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which note the following:
 - a. identify all days during which visible fugitive particulate emissions were observed from any non-stack egress point from the building housing this emissions unit;

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- b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions from the building housing this emissions unit;
- c. all exceedances of the rolling, 12-month summation limitation for total metal ground, in tons, from emission unit F007;
- d. all exceedances of the rolling, 12-month summation limitation for total particulate emissions, in tons, from emission units F007.

These reports are due by the date described in Part I - General Terms and Conditions of this permit under Section A.

V. Testing Requirements

- a. Emission Limitation:
PE shall not exceed 3.46 lbs/hr

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the maximum capacity of 3.20 tons of metal ground per hour by the emission factor of 3.6 pounds of PE per ton of metal ground (site specific emissions factor) by the control efficiency of the building structure (1-0.70, from SIP development)).

- b. Emission Limitation:
Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average from any non-stack egress point.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

- c. Emission Limitation:
PE from emission units F007 shall not exceed 4.46 tons per rolling, 12-month period.

Applicable Compliance Method:

See Part III.A.III.1 above.

VI. Miscellaneous Requirements

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Kenton Iron Products, Inc.
DTI Application: 02 17107

Facility ID: 0333010042

Emissions Unit ID: F007

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (F007) - Finishing operations - cutting and grinding

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(P001) - Mold and core wash operations

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 9.77 lbs/hr and 39.77 tons/yr.</p> <p>See Section A.I.2.a below.</p>
OAC rule 3745-21-07(G)(2)	See Section A.I.2.b below.

2. Additional Terms and Conditions

- 2.a The 9.77 pounds per hour and 39.77 tons per year emission limitations were written to reflect the potential to emit of this emissions unit. Therefore, additional monitoring, record keeping, and reporting requirements are not necessary to demonstrate compliance with these emissions limitations.
- 2.b To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

1. The maximum usage of wash material from this emissions unit shall not exceed 56,647 gallons per year.
2. The maximum wash material VOC content, as applied, shall not exceed 30% VOC,

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material by volume.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.
2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification of each wash material used;
 - b. the organic compound content of each wash material, in pounds VOC per pound of wash material;
 - c. the amount, in pounds, of each wash material used on a monthly basis;
 - d. the amount, in pounds, of each wash material used on an annual basis; and
 - e. the annual VOC emission rate (b x d for each wash material), in tons.

IV. Reporting Requirements

1. The permittee shall submit to the Director (Northwest District Office) deviation (excursion) reports which identify all periods during which photochemically reactive materials were employed in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit to the Director (Northwest District Office) deviation (excursion) reports which identify all periods during which the wash material exceeded the VOC content limitations specified above. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit annual reports that specify the total VOC emissions from emission unit P001 for the previous calendar year. This report shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for emission units P001 in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Kenton Iron Products, Inc.**DTI Application: 02-17107****Facility ID: 0333010042**

Emissions Unit ID: P001

VOC emissions shall not exceed 9.77 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum wash material usage of 6.7 lbs/hr by the maximum VOC content of 30%, by volume.

b. Emission Limitation:

VOC emissions shall not exceed 39.77 tons/yr.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation based on the record keeping under Section III.2.e above.

Emissions Unit ID: P001

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VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P001) - Mold and core wash operations

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P002) - Mold release operations

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 0.84 lbs/hr and 2.51 tons/yr. See Section A.I.2.a below.
OAC rule 3745-21-07(G)(2)	See Section A.I.2.b below.

2. Additional Terms and Conditions

- 2.a The 0.84 pounds per hour and 2.51 tons per year emission limitations were written to reflect the potential to emit of this emissions unit. Therefore, additional monitoring, record keeping, and reporting requirements are not necessary to demonstrate compliance with these emissions limitations.
- 2.b To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

II. Operational Restrictions

1. The maximum usage of release material from this emissions unit shall not exceed 665 gallons per year.
2. The maximum release material VOC content shall not exceed 5.58 pounds VOC per

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pound of release material by weight, excluding water and exempt solvents.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.
2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification of each release material used;
 - b. the organic compound content of each release material, in pounds VOC per pound of release material;
 - c. the amount, in pounds, of each release material used on a monthly basis;
 - d. the amount, in pounds, of each release material used on an annual basis; and
 - e. the annual VOC emission rate (b x d for each release material), in tons.

IV. Reporting Requirements

1. The permittee shall submit to the Director (Northwest District Office) deviation (excursion) reports which identify all periods during which photochemically reactive materials were employed in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit to the Director (Northwest District Office) deviation (excursion) reports which identify all periods during which the release material exceeded the VOC content limitations specified above. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit annual reports that specify the total VOC emissions from emission unit P002 for the previous calendar year. This report shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for emission units P002 in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Kenton Iron Products, Inc.

DTI Application: 02-17107

Facility ID: 0333010042

Emissions Unit ID: P002

VOC emissions shall not exceed 0.84 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the maximum release material usage of 0.15 gal/hr by the maximum VOC content of 5.58 lb VOC/lb release material.

b. Emission Limitation:

VOC emissions shall not exceed 2.51 tons/yr.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limitation based on the record keeping under Section III.2.e above.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P002) - Mold release operations

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 6/10/2008

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment -(P003) - New sand storage silo with pneumatic conveyance

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	0.13 ton particulate matter less than 10 microns in size (PM10)/year (See A.I.2.d) 0.03 grains PM10/dry standard cubic foot (dscf) Visible particulate emissions shall not exceed 5% opacity as a six-minute average See A.I.2.e
OAC rule 3745-17-07 (B)	Visible fugitive particulate emissions shall not exceed 20% opacity as a three-minute average
OAC rule 3745-17-08(B)	See A.I.2.b
OAC rule 3745-17-07(A)	See A.I.2.c
OAC rule 3745-17-11(B)	See A.I.2.c

2. Additional Terms and Conditions

- 2.a "Best Available Technology" (BAT) control requirements for this emissions unit has been determined to be use of a filter on the system bin vent that achieves a maximum outlet concentration of 0.03 grains PM10/dscf, and
- 2.b The requirements of this rule are equivalent to or less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The emission limitation specified by this rule is less stringent than the emission

Emissions Unit ID: P003

limitation established pursuant to OAC rule 3745-31-05(A)(3)

- 2.d All stack emissions of particulate matter are PM10.
- 2.e The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B).

II. Operational Restrictions

- 1. The maximum annual material throughput (through the loading spout) for this emissions unit shall not exceed 9630 tons.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the sand storage silo. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and,
 - e. any corrective actions taken to eliminate the abnormal visible emissions.

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

- 2. The permittee shall perform checks when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the sand storage silo. The presence or absence of any visible emissions shall be noted in an operations log for silo. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;

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- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall maintain monthly records of the amount of material throughput (through the loading spout) for this emissions unit, in tons per month and total tons, to date for the calendar year.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that:
 - a. identify all days during which any abnormal visible fugitive particulate emissions were observed from the new sand storage silo and describe any corrective actions taken to eliminate the abnormal visible fugitive particulate emissions.
 - b. identify all days during which any visible particulate emissions were observed from the new sand storage silo and describe any corrective actions taken to eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit annual reports that summarize the total amount of material throughput (through the loading spout), in tons, for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation
0.03 grains PM10/dscf, 0.13 ton PM10/year

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with the 0.03 gr PM10/dscf by testing in accordance with Methods 201/201A and 202 of 40 CFR

Emissions Unit ID: P003

Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

The annual emission limitation was established by the multiplying the maximum outlet concentration of 0.03 gr PM10/dscf, a maximum volumetric flow rate of 1000 acfm, a conversion factor of 60 minutes/hr, a conversion factor of 1.0 lb/7000 grains, a maximum operating schedule of 8760 hrs/yr, and a conversion factor of 2000 lbs/ton. Therefore provided compliance is shown with the gr/dscf limitation, compliance with the annual limitation will be assumed.

b. Emission Limitation

Visible particulate emissions shall not exceed 5% opacity as a six-minute average (from system bin vent and baghouse stack)

Applicable Compliance Method

If required, compliance shall be determined in accordance with the test method and procedures specified in Method 9 of 40 CFR Part 60, Appendix A.

c. Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average from any non-stack egress point.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(P003) - New sand storage silo with pneumatic conveyance

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None