



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
JACKSON COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

Application No: 06-08256

Fac ID: 0640010009

DATE: 3/6/2007

OSCO Industries Inc Jackson Div
Harry Gulley
Eleventh and Chillicothe Sts
Portsmouth, OH 45662

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1000** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

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

CC: USEPA

SEDO

KY

WV

Synthetic Minor Determination and/or Netting Determination

Permit To Install: "06-08256"

- A. Source Description - 13 tons per hour cupola melting system
- B. Facility Emissions and Attainment Status - The facility is located in Jackson County which is attainment for all criteria pollutants. Facility emission limitations have been established to restrict HAP emissions to below the applicable MACT thresholds (see Part II Section A.1 below.)
- C. Source Emissions - Short-term and rolling, 12-month emission limitations have been incorporated for PE, PM10, and CO. A short-term emission limitation is also specified for SO2 based upon OAC rule 3745-18-06(E). All applicable SIP limitations are identified. See Part III Section A.I.1 below.
- D. Conclusion - The terms and conditions of this PTI are sufficient to restrict HAP emissions to below the MACT thresholds and incorporate the provisions from the U.S. EPA Consent Order issued in November of 2005 for this emissions unit.



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 06-08256

Application Number: 06-08256
Facility ID: 0640010009
Permit Fee: **To be entered upon final issuance**
Name of Facility: OSCO Industries Inc Jackson Div
Person to Contact: Harry Gulley
Address: Eleventh and Chillicothe Sts
Portsmouth, OH 45662

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

**Athens and Chillicothe Sts
Jackson, Ohio**

Description of proposed emissions unit(s):

Chapter 31 modification.

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

OSCO Industries Inc Jackson Div
PTI Application: 06-08256
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0640010009

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

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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. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the

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permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

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- ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in

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this permit.

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B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit 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 of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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. Permit Transfers

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

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of

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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.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

6. 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.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

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9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

OSCO Industries Inc Jackson Div**Facility ID: 0640010009****PTI Application: 06-08256****Issued: To be entered upon final issuance****C. Permit-To-Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	22.58
PM ₁₀	38.06
CO	76.05
NOx	3.51
OC	9.45
SO2	9.92
Total HAPs	24.9
Individual HAP	9.9

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. Emission Limitations:

The facility-wide individual HAP and the facility-wide total combined HAP emissions shall not exceed 9.9 and 24.9 tons per year, respectively, based upon rolling, 12-month summations of the HAP emission rates. The following emissions units comprise the HAP evaluation in this permit: F004/F005 Wheelabrator #2 - Shotblaster Casting Cleaning, F007/F008 Pouring, Cooling, and Shakeout, F009 Stand Grinders, P903 Cupola Melting, P907/P009/Z002 Shell Mold Machines and Associated Machine and FARR HAPs. All remaining HAP emissions from other sources at the facility have a total potential to emit of less than 0.1 ton per year. Compliance with the facility-wide individual HAP and the facility-wide total combined HAP emission limitations shall be based upon rolling, 12-month summations of the monthly usage/emissions figures.

The permittee has sufficient records to begin calculating and tracking these rolling emission limitations upon issuance of this permit.

2. Monitoring and/or Record Keeping Requirements:

The permittee shall collect and record the following information each month:

- a. the quantity of metal melted and poured, in tons;
- b. the amount of shell sand processed, in tons;
- c. the facility-wide individual HAP and facility-wide total combined HAP emissions, in tons (i.e., the values from A.2.a and A.2.b above multiplied by the appropriate HAP emission factors specified in the HAP potential to emit spreadsheet submitted in association with the permit application for this PTI); and
- d. the rolling, 12-month summations of facility-wide individual HAP and facility-wide total combined HAP emissions, in tons.

3. Reporting:

The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month summations of facility-wide individual HAP and facility-wide total combined HAP emissions. The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

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4. Testing Requirements

Emission Limitations:

The facility-wide individual HAP and the facility-wide total combined HAP emissions shall not exceed 9.9 and 24.9 tons per year, respectively.

Applicable Compliance Method:

Compliance with the facility-wide individual HAP and the facility-wide total combined HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly usage/emissions figures.

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 Emission 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 emission 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 - (P903) - 13 tons per hour cupola melting system with afterburner and baghouse. Chapter 31 modification to restrict facility HAP emissions to avoid MACT and to incorporate provisions from USEPA Consent Order. The terms of this permit supersede those identified in PTI 06-4365 issued August 9, 1995 and PTI 06-8150 issued November 21, 2006 for this emissions unit.

Applicable Rules/Requirements	Applicable Emission Limitations/Control Measures
OAC rule 3745-31-05(C) (company requested voluntary restrictions)	<p>Particulate emissions (PE) from the baghouse stack serving this emissions unit shall not exceed 0.07 gr/dscf, and 22.58 tons per rolling, 12-month period.</p> <p>PM10 emissions from the baghouse stack serving this emissions unit shall not exceed 0.118 gr/dscf and 38.06 tons per rolling, 12-month period.</p> <p>Carbon monoxide (CO) emissions from the baghouse stack serving this emissions unit shall not exceed 2.5 lbs per ton of molten iron, and 76.05 tons per rolling, 12-month period. See Sections A.I.2.a and A.II.1.b below.</p> <p>Also see Part II - Facility Specific Terms and Conditions for restrictions to avoid the MACT requirements.</p>
OAC rule 3745-31-05(C) (restriction established to avoid PSD)	See Section A.II.1.a below. The operational restriction specified below was established for this emissions unit in PTI 06-4365 to avoid PSD.
OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust from any non-stack egress point at this emissions unit shall not exceed 20% opacity as a 3-minute average.
OAC rule 3745-17-08(B)	The ventilation rate for the control system shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the charge door.

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OAC rule 3745-17-11(B)(1) OAC rule 3745-21-08(D)	The requirements established pursuant to these rules are less stringent than the requirements of OAC rule 3745-31-05(C).
OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO ₂) emissions from the baghouse stack serving this emissions unit shall not exceed 167 lbs/hr.
ORC section 3704.03(T)(4)	See Section A.I.2.c below.
OAC rule 3745-21-08(B)	See Section A.I.2.b below.
40 CFR Part 63, Subparts A and EEEEE	The substantial compliance date for 40 CFR Part 63, Subpart EEEEE is April 22, 2007. This permit establishes synthetic minor restrictions to avoid triggering the MACT threshold levels.

2. Additional Terms and Conditions

2.a CO gases generated during the operation of this emissions unit shall be combusted such that the 3-hour average combustion zone temperature does not fall below 1,300 degrees Fahrenheit for 0.3 second or greater in a direct-flame afterburner, oxidizer or equivalent device equipped with an indicating pyrometer which is positioned in the working area at the operator's eye level. Periods when the cupola is off blast and for 15 minutes after going on blast from an off blast condition are not included in the 3-hour average.

2.b The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the CO emission limitations, monitoring, record keeping, and reporting requirements established pursuant to the U.S. EPA Consent Order which are incorporated into this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2.c The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the nitrogen oxides, organic compound, or SO₂ emissions from this air contaminant source since the uncontrolled potential to emit for each of these pollutants is less than ten tons per year.

II. Operational Restrictions

1. This emissions unit shall be limited to the following:

a. 60,840 tons of molten iron produced per year; and

Emissions Unit ID: P903

- b. 4,680 hours of operation per year.

Compliance with the operational restrictions shall be based on rolling, 12-month summations of the molten iron production rates and hours of operation.

The permittee has sufficient records to begin calculating and tracking these rolling limitations upon issuance of this permit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the hours of operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
2. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the total tons of molten iron produced, in tons;
 - b. the total hours of operation;
 - c. the total PE, in tons;
 - d. the total PM10 emissions, in tons;
 - e. the total CO emissions, in tons;
 - f. the rolling, 12-month summation of the tons of molten iron produced, in tons;
 - g. the rolling, 12-month summation of the hours of operation;
 - h. the rolling, 12-month summation of the PE, in tons;
 - i. the rolling, 12-month summation of the PM10 emissions, in tons; and
 - j. the rolling, 12-month summation of the CO emissions, in tons.
3. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
4. The pressure drop across the baghouse shall be maintained within the range of 2.0 to 10.0 inches of water while the emissions unit is in operation.

The permittee shall maintain daily records, when the emissions unit is in operation, of the pressure drop across the baghouse.

5. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion zone temperature of the afterburner when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be

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installed, calibrated (or replaced, as appropriate), operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall inspect and clean the burners of the afterburner at least once per year to ensure proper fuel mixing and efficient combustion and record each annual inspection and any related maintenance activity.

The permittee shall maintain daily records, when the emissions unit is in operation, of all 3-hour blocks of time during which the average temperature of the afterburner was less than 1,300 degrees Fahrenheit measured in the combustion zone. The permittee shall install an alarm device that alerts the permittee when the temperature measured in the combustion zone falls below the specified limitation and maintain a record of each such event.

6. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from egress points (i.e., building windows, building doors, roof monitors, charge doors, etc.) serving this emissions unit. 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 minimize or eliminate the 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.

IV. Reporting Requirements

Emissions Unit ID: P903

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following for this emissions unit:
 - a. all periods of time during which the recorded baghouse pressure drop was outside of the range specified above;
 - b. all 3-hour periods of time during which the afterburner combustion zone temperature was below the minimum temperature value specified above;
 - c. any exceedance of the rolling, 12-month hours of operation restriction specified above;
 - d. any exceedance of the rolling, 12-month restriction for the tons of molten iron produced specified above.
 - e. any exceedance of the rolling, 12-month emission limitation for PE specified above;
 - f. any exceedance of the rolling, 12-month emission limitation for PM10 specified above; and
 - g. any exceedance of the rolling, 12-month emission limitation for CO specified above.

The reports shall identify the cause(s) (if known) of each excursion, duration of the excursion, applicable operating rates during the excursion, and the corrective actions which were taken for each excursion. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

If an exceedance did not occur during the reporting period, then a report stating that fact is required.

2. The permittee shall submit quarterly written reports that identify the following:
 - a. all days during which any visible fugitive particulate emissions were observed from the from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

Issued: To be entered upon final issuance

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:

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1.a Emission Limitations:

PE from the baghouse stack serving this emissions unit shall not exceed 0.07 gr/dscf, and 22.58 tons per rolling, 12-month period.

Applicable Compliance Methods:

Compliance with the short-term emission limitation shall be demonstrated based upon the emission testing specified in Section A.V.2.

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the records required in Section A.III.2 above.

1.b Emission Limitations:

PM₁₀ emissions from the baghouse stack serving this emissions unit shall not exceed 0.118 gr/dscf, and 38.06 tons per rolling, 12-month period.

Applicable Compliance Methods:

Compliance with the short-term emission limitation shall be demonstrated based upon the emission testing specified in Section A.V.2.

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the records required in Section A.III.2 above.

1.c Emission Limitations:

CO emissions from the baghouse stack serving this emissions unit shall not exceed 2.5 lbs per ton of molten iron produced, and 76.05 tons per rolling, 12-month period.

Applicable Compliance Methods:

The lbs of CO/ton of molten iron emission limitation was established during the most recent emission tests that demonstrated that the emissions unit was in compliance (2.5 lbs CO/ton, per March 2006 emission tests).

If required, compliance with the lbs of CO/ton of molten iron emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10 and the production

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records corresponding to the emission test periods. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the records required in Section A.III.2 above.

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1.d Emission Limitation:

SO₂ emissions from the baghouse stack serving this emissions unit shall not exceed 167 lbs/hr.

Applicable Compliance Method:

Compliance with this limitation may be assumed due to the high allowable emission limitation and the relatively low amount of sulfur dioxide emitted from the process.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

1.e Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

1.f Emission Limitation:

Visible particulate emissions from the baghouse stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 2.** The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

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- a. The emission testing shall be conducted within 6 months following issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE and PM10.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

for PE: Methods 1 through 5 of 40 CFR Part 60, Appendix A, and
for PM10: Methods 1 through 4 and Methods 201A and 202, as codified at 40 CFR Part 60, Appendix A and 40 CFR Part 51, Appendix M, respectively.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Southeast District Office.

- d. The test(s) shall be conducted under maximum production rates in conjunction with other emissions units functioning which are controlled by the same emissions control device as this emissions unit, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.

Not later than 30 day prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the test and submitted to the Ohio EPA, Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast

District Office.

VI. Miscellaneous Requirements

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

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B. State Only Enforceable Section

I. Applicable Emission 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 emission 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 - (P903) - 13 tons per hour cupola melting system with afterburner and baghouse. Chapter 31 modification to restrict facility HAP emissions to avoid MACT and to incorporate provisions from USEPA Consent Order. The terms of this permit supersede those identified in PTI 06-4365 issued August 9, 1995 and PTI 06-8150 issued November 21, 2006 for this emissions unit.

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

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None