



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**Application No:** 07-00570

**Fac ID:** 0773010001

**DATE:** 3/6/2007

OSCO Industries Portsmouth Division  
Ryan Burke  
P O Box 1388 11th and Chillicothe Streets  
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

PCHD

KY

WV

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

Permit To Install: "07-00570"

A. Source Description

Oscos Industries, Portsmouth is proposing to modify the Laempe Core Machine PTI to establish federally enforceable synthetic minor limits to avoid the steel and iron foundries MACT, 40 CFR Part 63, Subpart EEEEE, which has a compliance date of April 22, 2007.

B. Facility Emissions and Attainment Status

Oscos Industries, Portsmouth is a Title V facility classified as major for Particulate Matter. They are located in Scioto County which is designated as attainment for all criteria pollutants except for Particulate Matter less than 2.5 microns.

C. Source Emissions

Oscos Industries, Portsmouth is proposing to modify the Laempe Core Machine PTI in order to establish federally enforceable emission limitations for both individual and combined HAP emissions of combined HAP emissions less than or equal to 24.9 tons per year and individual HAP emissions less than or equal to 9.9 tons per year.

D. Conclusion

Oscos Industries, Portsmouth is currently a Title V facility and will be subject to the Iron and Steel Foundries MACT (40 CFR Part 63, Subpart EEEEE) April 22, 2007. Monthly monitoring, record keeping and quarterly deviation will be required to monitor compliance. Therefore, through federally enforceable terms and conditions, production limitations and record keeping requirements, Oscos will not trigger MACT requirements.



**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 07-00570**

Application Number: 07-00570  
Facility ID: 0773010001  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: OSCO Industries Portsmouth Division  
Person to Contact: Ryan Burke  
Address: P O Box 1388 11th and Chillicothe Streets  
Portsmouth, OH 45662

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**11th and Chillicothe Streets  
Portsmouth, Ohio**

Description of proposed emissions unit(s):  
**Chapter 31 modification to establish synthetic minor limits to avoid MACT applicability.**

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

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Chris Korleski  
Director

OSCO Industries Portsmouth Division  
PTI Application: 07-00570  
Issued: To be entered upon final issuance  
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0773010001

**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

**OSCO Industries Portsmouth Division**

**Facility ID: 0773010001**

**PTI Application: 07-00570**

**Issued: To be entered upon final issuance**

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

**OSCO Industries Portsmouth Division**

**Facility ID: 0773010001**

**PTI Application: 07-00570**

**Issued: To be entered upon final issuance**

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.

**OSCO Industries Portsmouth Division**  
**PTI Application: 07-00570**  
**Issued: To be entered upon final issuance**  
**7. Fees**

**Facility ID: 0773010001**

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.

**OSCO Industries Portsmouth Division**

**Facility ID: 0773010001**

**PTI Application: 07-00570**

**Issued: To be entered upon final issuance**

**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

**OSCO Industries Portsmouth Division**

**Facility ID: 0773010001**

**PTI Application: 07-00570**

**Issued: To be entered upon final issuance**

the Ohio EPA. Progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
- ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **10. Permit-To-Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit 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.

**OSCO Industries Portsmouth Division**

**Facility ID: 0773010001**

**PTI Application: 07-00570**

**Issued: To be entered upon final issuance**

**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 this permit.

**OSCO Industries Portsmouth Division**

**Facility ID: 0773010001**

**PTI Application: 07-00570**

**Issued: To be entered upon final issuance**

**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

**OSCO Industries Portsmouth Division****Facility ID: 0773010001****PTI Application: 07-00570****Issued: To be entered upon final issuance**

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.

OSCO Industries Portsmouth Division

Facility ID: 0773010001

PTI Application: 07-00570

Issued: To be entered upon final issuance

**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 Portsmouth Division****Facility ID: 0773010001****PTI Application: 07-00570****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**

<b><u>Pollutant</u></b>	<b><u>Tons Per Year</u></b>
PE	1.43
SO2	1.96
OC	2.35
Combined HAPs	24.9
Single HAP	9.9

OSCO Industries Portsmouth Division

Facility ID: 0773010001

PTI Application: 07-00570

Issued: To be entered upon final issuance

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

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

**1. Applicable Rules and Emission Limitations**

OAC rule 3745-31-05(C)

The facility-wide individual hazardous air pollutant (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: Stand Grinders (F004), Wheelabrators #1, #2, #4, #5, #6 shotblasters casting cleaning (P014, P015, P016, P018, P021), Laempe Core Machine (P022), Disamatic #1: pouring, cooling and shakeout (F001), Osborne Line: pouring, cooling and shakeout (F002), East Line: pouring, cooling, and shakeout (F003), Disamatic #2: pouring, cooling and shakeout (P013), West Iron Cupola (P906), East Iron Cupola (P907), and Gray Iron Foundry Core Machine (P017).

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. Additional Terms and Conditions**

None

**3. Operational Restrictions**

The maximum annual production rate from this facility (emission units P906 and P907 combined) shall not exceed 80,000 tons of metal melted and poured, based upon a rolling, 12-month summation of the production rates.

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

**OSCO Industries Portsmouth Division**

**Facility ID: 0773010001**

**PTI Application: 07-00570**

**Issued: To be entered upon final issuance**

**4. Monitoring and/or Record keeping Requirements**

The permittee shall collect and record the following information each month for emissions units P906 and P907:

- a. the quantity of metal melted and poured, in tons;
- b. the amount of isoset 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.4.a and A.4.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.

**5. Reporting Requirements**

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 requirements specified in Part I - General Term and Condition A.1.c of this permit.

**6. Testing Requirements**

Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following method:

Emission Limitation:

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 the record keeping requirements specified in Part II, section A.4.

**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 - (P022) - Laempe core machine and core sand mixer with packed tower scrubber modification to establish synthetic minor emission limits to avoid MACT**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Particulate emissions from this emissions unit shall not exceed 0.33 lb/hr and 1.43 tpy  Sulfur dioxide emissions from this emissions unit shall not exceed 0.45 lb/hr and 1.96 tpy.  Organic compounds (OC) emission from this emissions unit shall not exceed 0.54 lb/hr and 2.35 tpy.  Visible particulate emissions shall not exceed 10% opacity as a 6-minute average.
OAC rule 3745-31-05(C)	See Part II, section A.1.
OAC rule 3745-17-07(A)	See section A.I.2.a below.
OAC rule 3745-17-07(B)	See section A.I.2.c below.
OAC rule 3745-17-08(B)	See section A.I.2.b below.
OAC rule 3745-17-11(B)	See section A.I.2.a below.
OAC rule 3745-21-07(G)(2)	See section A.II.1 below.

**2. Additional Terms and Conditions**

- 2.a The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Emissions Unit ID: P022

- 2.b** This emissions unit is not located in an "Appendix A" area as identified in OAC rule 3745-17-08 ( it is located in Scioto County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- 2.c** This emissions unit is exempt from the visible emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

## II. Operational Restrictions

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

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Portsmouth Local Air Agency. This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

2. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 4 to 6 inches of water at all times while the emissions unit is in operation.

The scrubber water flow rate shall be continuously maintained at a value of not less than 50 gallons per minute (pump at not less than 3.5 amps) at all times while the emissions unit is in operation. The permittee has demonstrated that the scrubber water flow rate of 50 gallons per minute is equivalent to the pump value of 3.5 amps.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. the pressure drop across the scrubber, in inches of water, on a daily basis;
  - b. the scrubber pump electrical current, in amps, on a daily basis; and
  - c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack

Emissions Unit ID: P022

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 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 visible emissions.

#### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels specified in section A.II.2:
  - a. the static pressure drop across the scrubber; and
  - b. the scrubber water flow rate.
2. The permittee shall submit semi-annual written reports that (a) identify all periods of time during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Portsmouth Local Air Agency by January 31 and July 31 of each year and shall cover the previous 6-month period.

#### 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:

Particulate emissions shall not exceed 0.33 lb/hr and 1.43 tpy.

Applicable Compliance Method:

The pounds per hour and tons per year emission limitations are based on the emissions units potential to emit. Therefore, no record keeping, deviation reporting or compliance method calculations are required to demonstrate

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compliance with this limitation.

The pounds per hour potential to emit for this emissions unit was determined by multiplying the maximum production rate of 1.6 tons per hour by the emission factor from RACM, Table 2.7-1 of 0.68 lb PM / ton, applying a 70% control factor for building enclosure. The tons per year limitation was determined by multiplying the hourly emission limitation by 8,760 hours per year, and then dividing by 2,000 pounds per ton.

b. Emission Limitation:

Sulfur dioxide emissions shall not exceed 0.45 lb/hr and 1.96 tpy.

Applicable Compliance Method:

The pounds per hour and tons per year emission limitations are based on the emissions units potential to emit. Therefore, no record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

The pounds per hour potential to emit for this emissions unit was determined by multiplying the maximum production rate of 1.6 tons per hour by the emission factor manufacturer of 14 pounds per ton (assuming none of the catalyst is consumed by the process) applying a 99% control factor for the packed bed scrubber. The tons per year limitation was determined by multiplying the hourly emission limitation by 8,760 hours per year, and then dividing by 2,000 pounds per ton.

c. Emission Limitation:

Organic compounds emissions shall not exceed 0.54 lb/hr and 2.35 tpy.

Applicable Compliance Method:

The pounds per hour and tons per year emission limitations are based on the emissions units potential to emit. Therefore, no record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

The pounds per hour potential to emit for this emissions unit was determined by

Emissions Unit ID: P022

multiplying the maximum production rate of 1.6 tons per hour by the emission factor from OCMA test data of 0.34 pound per ton. The tons per year limitation was determined by multiplying the hourly emission limitation by 8,760 hours per year, and then dividing by 2,000 pounds per ton.

d. Emission Limitation:

Visible particulate emissions shall not exceed 10% opacity as a 6-minute average.

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Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible emission observations performed in accordance with the method and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

**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 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 - (P022) - Laempe core machine and core sand mixer with packed tower scrubber modification to establish synthetic minor emission limits to avoid MACT**

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

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None