



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
SCIOTO COUNTY**

CERTIFIED MAIL

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Lazarus Gov. Center
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Application No: 07-00461

DATE: 3/19/2002

OSCO Industries New Boston Division
John Burke
PO Box 1388
Portsmouth, OH 456620000

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

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

Very truly yours,

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

CC: USEPA

PCHD



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: 3/19/2002
Effective Date: 3/19/2002**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 07-00461

Application Number: 07-00461
APS Premise Number: 0773010180
Permit Fee: **\$0**
Name of Facility: OSCO Industries New Boston Division
Person to Contact: John Burke
Address: PO Box 1388
Portsmouth, OH 456620000

Location of proposed air contaminant source(s) [emissions unit(s)]:
**202 Vine St
New Boston, Ohio**

Description of proposed emissions unit(s):
South cooling drum.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.


Ohio Environmental Protection Agency

Director

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 Related to Monitoring and Record keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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 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)

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

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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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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.

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

- 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

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modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

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>
PM/PM ₁₀	30.8 (baghouse emissions)
PM/PM ₁₀	1.69 (fugitive emissions)

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P908: Cooling Drum (south) hooding with 99% capture efficiency vented to the EFDC and WCC baghouses	OAC rule 3745-31-05 OAC rule 3745-17-07 OAC rule 3745-17-11	Shall not exceed the existing allowable of 0.015 gr/dscf of exhaust gases and 15.7 tons per year PM/PM ₁₀ from the EFDC ** (See section A.2.a below.)
modification to increase allowable emission rate and add new wheelabrator cartridge collector		Shall not exceed the existing allowable of 0.015 gr/dscf of exhaust gases and 15.13 tons per year PM/PM ₁₀ from the WCC ** (See section A.2.a below.)
modification to correct the emissions unit ID number from F008 to P908		0.65 pound/hour and 1.69 tpy particulate fugitive emissions *** ** No visible particulate emissions from the baghouse stacks. *** There shall be no visible emissions of particulate matter from building openings (such as roof vents, doors, etc.)

2. Additional Terms and Conditions

- 2.a Sources P005, P009, P012, P906 (pouring), P910 (pouring), P014, P915, P916, and

P917 are vented to the Finishing/Melt Dust Collector.

Sources P908, P913, P915, P916, and P917 are vented to the Wheelabrator Cartridge Collector.

Sources P906 (shakeout), P910 (shakeout), and P908 are vented to the East Foundry Dust Collector.

- 2.b** The South Cooling Drum collection hooding shall have a collection efficiency sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- 2.c** Any sources venting to the Finishing/Melt Dust Collector (FMDC), including sources P005, P009, P012, P014, P906 (pouring), P910 (pouring), P915, P916, and P917 and the East Foundry Dust Collector (EFDC), including sources P906 (shakeout), P908, and P910 (shakeout) and the Wheelabrator Cartridge Collector (WCC), including sources P908, P913, P915, P916, and P917 shall not operate unless the FMDC, the SSDC, the EFDC and the WCC are in operation.

To ensure that this condition is met, sources P005, P009, P012, P014, P906, P908, P910, P913, P915, P916, P917, and P918 shall have a Programmable Logic Controllers (PLCs) which is programmed to prevent the source from operating without the FMDC in operation. If a control equipment malfunction occurs, sources P005, P009, P012, P014, P906, P908, P910, P913, P915, P916, P917, and P918 shall be shut down after the cycle is completed. An audible alarm shall be sounded to notify personnel of the malfunction.

- 2.d** If more sources are added to the FMDC, SSDC, EFDC, and the WCC each dust collector's allowable rate shall remain at 0.015 grain per dry standard cubic foot of exhaust gases.

B. Operational Restrictions

1. Operating restrictions are being established in this permit to install. However, a federally enforceable state operating permit, issued first in draft form, will be requested by the permittee in order to establish these restrictions as federally enforceable limitations, limiting potential to emit to maintain minor source status for Title V purposes.
2. The maximum annual operating hours for source P908 shall not exceed 5200 hours, based upon a rolling, 12-month summation of the operating hours.
3. The maximum annual operating hours for , the Finish/Melt Dust Collector and the Wheelabrator

Dust Collector shall not exceed 6240 hours per source, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hour levels specified in the following table for the Wheelabrator Cartridge Collector:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	520
1-2	1040
1-3	1560
1-4	2080
1-5	2600
1-6	3120
1-7	3640
1-8	4160
1-9	4680
1-10	5200
1-11	5720
1-12	6240

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The operating hours for each month; and,
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the operating hours.

Also, during the first 12 calendar months of operation following the issuance of this permit, the

permittee shall record the cumulative operating hours for each calendar month.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels.

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, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

E. Testing Requirements

1. The performance test requirements apply only to the new Wheelabrator Cartridge Collector

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the tests, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- a. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- b. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- c. Tests shall be performed for the following source(s) and pollutant(s):

Sources

P908

PollutantsPM/PM₁₀

2. Compliance with the emissions limitations listed in section A.1 above shall be determined in accordance with the following methods:
- a. Emission Limitation:

0.015 grain per dry standard cubic feet of exhaust gases PM/PM₁₀

Applicable Compliance Method:

Emissions test conducted in accordance with USEPA Method 5
 - b. Emission Limitation:

15.13 tons per year PM/PM₁₀ from the Wheelabrator Cartridge Collector

Applicable Compliance Method:

Multiply the dry standard feet of exhaust gases per minute (37,685) by 60 minutes per hour by 0.015 gr/dscf of exhaust gases divided by 7000 grains per pound multiplied by the maximum annual operating hours of 6240 hours, based upon a rolling, 12-month summation and divide by 2000 pounds per ton.
 - c. Emission Limitation:

0.65 lb/hr particulate fugitive emissions

Applicable Compliance Method:

Multiply the emission factor of 0.65 lb/ton by the maximum tons sand handled per hour by the percentage of uncaptured fugitive emissions (0.01).
 - d. Emission Limitation:

1.69 TPY particulate fugitive emissions

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Emissions Unit ID: **P908**

Applicable Compliance Method:

Multiply 0.65 lb/hr particulate fugitive emissions by the maximum annual operating hours of 5200 hours, based upon a rolling, 12-month summation and divide by 2000 pounds per ton.

F. Miscellaneous Requirements

None