

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

Permit To Install **01-01344**

A. Source Description

The Liberty Casting Company operates a grey iron foundry located in Delaware County at 550 South Liberty Road. Delaware is now considered non-attainment for ozone. The facility is considered a Title V facility for volatile organic compound (VOC) emissions and possibly hazardous air pollutants (HAPs). The Liberty Casting Company has instituted federally enforceable restrictions on the facility to limit their emissions of VOC to coincide with larger facility-wide operational and emission restrictions.

B. Facility Emissions and Attainment Status

The Liberty Casting Company is currently classified as a Title V permit-to-operate facility. Delaware is now considered non-attainment for ozone and particulate matter less than 2.5 microns in diameter (PM_{2.5}).

C. Source Emissions

Potential emissions of VOC from this new mixer without federally enforceable restrictions are 61.5 tons VOC per year and due to the sand being premixed with a binder liquid no particulate matter emissions are emitted from this emissions unit. Limiting the operating time of the sand mixer will limit VOC emissions from this emissions unit to 5.0 tons of VOC per rolling, 12-month summation. Since Delaware County is considered non-attainment for ozone, the federally enforceable restriction in this air permit-to-install (PTI) will prevent the emission unit from triggering non-attainment new source review (NSR).

D. Conclusion

The Liberty Casting Company will limit the operating time of emissions unit P056 and the emissions of VOC. These restrictions will effectively restrict the increase in VOC emissions to below applicable non-attainment NSR threshold levels. Monitoring, record keeping and calculations, along with quarterly and annual reports for emissions unit P056 have been incorporated to monitor compliance.



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 01-01344

Fac ID: 0121010003

DATE: 1/12/2006

Liberty Casting Company
Renee Olney
550 Liberty Road
Delaware, OH 43015

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, 43266-0149.

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

CDO

DELAWARE COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 01-01344 FOR AN AIR CONTAMINANT SOURCE FOR
Liberty Casting Company**

On 1/12/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Liberty Casting Company**, located at **550 S. Liberty Road, Delaware, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-01344:

Core making station/ sand mixer.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417
[(614)728-3778]



**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 01-01344

Application Number: 01-01344
Facility ID: 0121010003
Permit Fee: **To be entered upon final issuance**
Name of Facility: Liberty Casting Company
Person to Contact: Renee Olney
Address: 550 Liberty Road
Delaware, OH 43015

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

**550 S. Liberty Road
Delaware, Ohio**

Description of proposed emissions unit(s):

Core making station/ sand mixer.

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

Director

Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

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 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,

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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.

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- 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.
 - 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

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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 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.

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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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	5.0

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PTI A

Emissions Unit ID: P056

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

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PTI A**

Emissions Unit ID: P056

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P056 - Large Chromite Sand Mixer LRMX5	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 14.04 lbs/hr. See Part III.A.1.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C) (synthetic minor to avoid non-attainment new source review [NSR])	VOC emissions shall not exceed 5.0 tons per rolling, 12-month summation.
	OAC rule 3745-21-07(G)(2)	See Part III.A.1.2.b below.

2. Additional Terms and Conditions

- 2.a The 14.04 pounds per hour emission limitation was written to reflect the potential to emit of this emissions unit. Therefore, additional monitoring, record keeping and reporting requirements are not necessary to demonstrate compliance with this emission limitation.
- 2.b This emission unit uses a phenolic urethane no-bake resin binder system in foundry core-making and mold-making operations. Therefore, pursuant to OAC

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rule 3745-21-07 (G)(9)(i), the requirements of OAC rule 3745-21-07(G)(2) do not apply to this emissions unit.

II. Operational Restrictions

1. The maximum operating time for this emissions unit shall not exceed 43,000 minutes, based upon a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the operating minutes specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Minutes</u>
1	10,000
1-2	20,000
1-3	25,000
1-4	30,000
1-5	35,000
1-6	40,000
1-7	43,000
1-8	43,000
1-9	43,000
1-10	43,000
1-11	43,000
1-12	43,000

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

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the operating minutes;
 - b. the VOC emission rate, in tons;
 - c. during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative operating minutes for each calendar month;
 - d. beginning after the first 12 calendar months of operation or the first 12 calendar

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months following the issuance of this permit, the rolling, 12-month summation of the operating minutes; and

- e. the total VOC emission rate based on a rolling, 12-month summation, in tons, $[\text{c or d} \times 12 \text{ tons of sand} / 60 \text{ minutes} \times 1.17 \text{ lbs VOC/ton of sand (Ohio EPA/OCMA study, "New emission factors for core/mold making operations Part I", 2/16/98)} \times 1 \text{ ton} / 2000 \text{ lbs}]$.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12-month limitation on the minutes of operation;
 - b. for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative minutes of operation;
 - c. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the rolling, 12-month operating minutes limitation; and
 - d. the rolling, 12-month VOC emission limitation.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit. If no deviations occurred during the calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
VOC emissions shall not exceed 14.04 lbs/hr.

Applicable Compliance Method:

Compliance with the short term emission limitation may be determined by multiplying the maximum throughput of 12 tons of sand/hr (PTI application submitted 11/02/05) by the emission factor of 1.17 lbs VOC/ton of sand (Ohio

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EPA/OCMA study, "New emission factors for core/mold making operations Part I", 2/16/98).

- b. Emission Limitation:
VOC emissions shall not exceed 5.0 tons per rolling, 12-month summation.

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

VI. Miscellaneous Requirements

The Ohio EPA reserves the right to: (a) update the emissions factors used to estimate organic compound (OC) and VOC emissions and/or (b) redefine the actual and allowable OC/VOC emissions in this permit to install for the core and/or mold making process(es) at the facility.

Upon written notification from the Ohio EPA concerning the identification and availability of updated and more representative OC/VOC emission factors, the permittee may be required to reevaluate the estimated OC/VOC emissions from the core and/or mold making operation(s) using the updated emission factors. Should the updated emission factors indicate an increase in estimated OC and/or VOC emissions the permittee shall submit the following (one copy to the appropriate District Office or Local Air Agency and one copy to the Ohio EPA, Division of Air Pollution Control, Central Office):

1. Revised OC/VOC Emissions Estimates:

Within sixty (60) days of receipt of the written notification from Ohio EPA, the permittee shall submit updated OC/VOC emissions estimates (maximum rate in lbs/hour and tons/year) for each core and/or mold making operation covered under this permit, using the updated emission factors.

2. Reevaluation of BAT and Compliance with OAC Rule 3745-21-07(G):

- a. Within one hundred and twenty (120) days of submittal of the revised emissions estimates, for each core and/or mold making operation the permittee shall submit:

i. for each core and/or mold making operation permitted herein utilizing photochemically reactive materials, as defined in OAC rule 3745-21-01, an analysis that reevaluates the status of compliance with the requirements of OAC rule 3745-21-07(G); and

ii. a Best Available Technology (BAT) analysis or study, conducted in accordance with Ohio EPA Engineering Guide #46, if appropriate, that defines BAT for the operation(s).

- b. Within thirty (30) days of submittal of the rule analysis and the BAT analysis or

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study, facility representatives shall meet with representatives of the Ohio EPA, DAPC and the appropriate District Office of local air agency to discuss and resolve any issues related to the submittals.

- c. Should the rule analysis and/or BAT analysis or study indicate that at the revised estimated OC/VOC emission rates additional emissions reductions are warranted to meet the requirements of OAC rule 3745-21-07(G) and/or the BAT requirements (OAC rule 3745-31-05), within thirty (30) days after submission of the analysis or study, the permittee shall submit an expeditious schedule for implementation of the additional emissions control for the core and/or mold making operations permitted herein. This schedule shall include the following milestone dates, as applicable:

<u>Milestone</u>	<u>Date</u>
i. Submit, if required, a PTI modification application implementing the revised BAT determination by	_____
ii. Execute the purchase order(s) for procurement of equipment or components needed to implement additional emissions control by	_____
iii. Initiate installation of equipment and/or components, or initiate implementation of operational changes, to implement additional OC/VOC emissions control by	_____
iv. Complete installation of equipment and/or components, or operational changes, to implement additional OC/VOC emissions control by	_____
v. Achieve and demonstrate final compliance with OAC rule 3745-21-07(G) and/or the revised BAT determination by	_____

3. Title V Permit Application:

- a. Existing Title V facilities

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Facility ID: 0121010003

Emissions Unit ID: P056

For a facility with a Title V application previously submitted, within one hundred and eighty (180) days of the revised BAT determination or submittal of the revised emissions estimates, whichever is later, the permittee shall submit a revised Title V application incorporating the revised emissions estimates and any other information needed to update the application as a result of the revised emissions estimates.

4. Emissions Fee Report (for facilities subject to the Title V regulations):

Within ninety (90) days of submittal of the revised estimated emissions (item #1), the permittee shall submit a Fee Emission Report to the Ohio EPA , in accordance with OAC Chapter 3745-78 and Ohio EPA Engineering Guide #61, for the most recent completed calendar year in which the facility would be classified as a "major" under the Ohio Title V regulations.

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PTI A**

Emissions Unit ID: P056

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P056 - Large Chromite Sand Mixer LRMX5	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None