



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION
COSHOCOTON COUNTY
Application No: 06-07603
Fac ID: 0616010006**

CERTIFIED MAIL

DATE: 11/16/2006

Clow Water Systems Co
Patrick Huth
PO Box 6001 2266 South 6th St
Coshocoton, OH 43812

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of **\$ 625** 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

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

CC: USEPA

SEDO

WV

COSHOCTON COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 06-07603 FOR AN AIR CONTAMINANT SOURCE FOR
Clow Water Systems Co**

On 11/16/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Clow Water Systems Co**, located at **2266 South 6th St, Coshocton, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-07603:

Administrative modification of EU F009 to add facility-wide HAP emissions limitations and operating restrictions to avoid the Subparts MMMM and EEEEE MACTs.

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.

Bruce Weinberg, Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138 [(740)385-8501]



**Permit To Install
Terms and Conditions**

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

DRAFT MODIFICATION OF PERMIT TO INSTALL 06-07603

Application Number: 06-07603
Facility ID: 0616010006
Permit Fee: **To be entered upon final issuance**
Name of Facility: Clow Water Systems Co
Person to Contact: Patrick Huth
Address: PO Box 6001 2266 South 6th St
Coshocton, OH 43812

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2266 South 6th St
Coshocton, Ohio**

Description of proposed emissions unit(s):
Administrative modification of EU F009 to add facility-wide HAP emissions limitations and operating restrictions to avoid the Subparts MMMM and EEEEE MACTs.

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. 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

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

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

Issued: To be entered upon final issuance

permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

8. Federal and State Enforceability

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

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - 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

Issued: To be entered upon final issuance

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

12. Air Pollution Nuisance

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

13. Permit-To-Install

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

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 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.

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.

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>
PE	10
PM ₁₀	5.85
VOC	10.5
CO	33.75
Individual HAPs	9.9
Total HAPs	24.9

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

I. Facility-Wide Emission Limitations

1. The facility-wide individual HAP and the facility-wide total combined HAP emissions shall not exceed 9.9 and 24.9 tons per year, respectively, based upon a rolling, 12-month summation of the emission rates from the following HAP-emitting and potential HAP-emitting units at the facility:

B001, B002, B006, B007, F004, F005, F007, F009, F010, F014, F015, F016, F018, F022, K001, K002, K006, K007, K008, K009, P020, P033, P901, Z004, Z008, Z024, Z074, Z075, Z076, Z077, Z081, Z082, Z129, Z131 and Z132.

II. Operational Restrictions

1. In order to maintain compliance with the facility-wide emission limitations on HAPs, the permittee is limited to the following annual operational restrictions:
 - a. 275,000 tons of total metal melted;
 - b. 15,000 tons of metal poured at Jolt Pouring and Cooling (F009);
 - c. 20,000 tons of metal poured at BMM Pouring and Cooling (F010);
 - d. 36,000 tons of metal processed at Foundry Shotblast (F015); and
 - e. 600,405 mmBTU of syngas burned in the Annealing Oven (P020) and Cupola Hot Blast (P033).
2. In order to maintain compliance with the facility-wide emission limitations on HAPs, only materials that contain no organic HAP may be used at Core Wash (K001), Pipe Paint Operations (K006), Small PUNB Mold and Core Wash (K007), Large PUNB Mold and Core Wash (K008), Leampe Core Wash (K009), Cleanup Solvent (Z008), Core Glue (Z074), Paint Pad - Small Line (Z076), Paint Pad - Large Line (Z077), Pipe Painting - Large Line (Z081), and Jolt Line Mold Wash (Z082). "No Organic HAP" means materials that contain organic HAP levels below the levels specified in Sec. 63.3941(a) of the final rule, which are typical Occupational Safety and Health Administration (OSHA) reporting levels for material safety data sheets that only count organic HAPs that are present at 0.1 percent or more by mass for OSHA-defined carcinogens and at 1.0 percent or more by mass for other compounds.

III. Facility-Wide Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. the quantity of metal melted, in tons;
 - b. the quantity of metal poured at Jolt Pouring and Cooling (F009), in tons;
 - c. the quantity of metal poured at BMM Pouring and Cooling (F010), in tons;
 - d. the quantity of metal processed at Foundry Shotblast (F015), in tons;

- e. the quantity of syngas burned in the Annealing Oven (P020) and Cupola Hot Blast (P033), in mmBTU;
 - f. the facility-wide individual HAP and facility-wide total combined HAP emissions, in tons;
 - g. the rolling, 12-month summation of the quantity of metal melted, in tons;
 - h. the rolling, 12-month summation of the quantity of metal poured at Jolt Pouring and Cooling (F009), in tons;
 - i. the rolling, 12-month summation of the quantity of metal poured at BMM Pouring and Cooling (F010), in tons;
 - j. the rolling, 12-month summation of the quantity of metal processed at Foundry Shotblast (F015), in tons;
 - k. the rolling, 12-month summation of the quantity of syngas burned in the Annealing Oven (P020) and Cupola Hot Blast (P033), in mmBTU; and
 - l. the rolling, 12-month summation of the facility-wide individual HAP and facility-wide total combined HAP emissions, in tons.
2. The permittee shall collect and record the following information each month for each of the following emissions units: Core Wash (K001), Pipe Paint Operations (K006), Small PUNB Mold and Core Wash (K007), Large PUNB Mold and Core Wash (K008), Leampe Core Wash (K009), Cleanup Solvent (Z008), Core Glue (Z074), Paint Pad - Small Line (Z076), Paint Pad - Large Line (Z077), Pipe Painting - Large Line (Z081), and Jolt Line Mold Wash (Z082):
- a. For any day that a material containing organic HAP is used in any of the above-listed emissions units:
 - i. the company identification for each HAP-containing coating and cleanup material employed;
 - ii. the number of gallons of each HAP-containing coating or cleanup material employed;
 - iii. the organic HAP content of each coating and cleanup material, in pounds per gallon;
 - iv. the total organic HAP emission rate for all coatings and cleanup materials, in pounds per day; and
 - v. the total number of hours the emissions unit was in operation.
 - b. For any day that a material containing no organic HAP is used in any of the above-listed emissions units:
 - i. the company identification for each coating or cleanup material employed that contains no organic HAP;

Issued: To be entered upon final issuance

- ii. the number of gallons of each coating or cleanup material employed that contains no organic HAP.
3. The permittee has sufficient records to begin calculating and tracking these rolling emissions limitations and operational restrictions upon issuance of this permit.

IV. Reporting Requirements

1. 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 limitations in Section A.II.1.I.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

2. The permittee shall notify the Ohio EPA, Southeast District Office of any monthly record showing an exceedance of the rolling, 12-month operational restrictions in Section A.II.1. or any deviation from the no organic HAP coating restrictions specified in Section A.II.2. A copy of such record shall be sent to the Ohio EPA, Southeast District Office within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the facility-wide individual and total combined HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly emissions figures determined in accordance with the recordkeeping requirements in Section A.III.1 for the units identified in Section A.I.1. Calculations shall follow the methodology presented in Attachment A of this permit.
2. Compliance with the annual operational restrictions shall be based upon a rolling, 12-month summation of the monthly usage figures determined in accordance with the recordkeeping requirements in Section A.III.1.
3. Compliance with the no organic HAP coatings restrictions shall be demonstrated based upon the record keeping requirements specified in Section A.III.2.

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

None.

Clow Water Systems Co
PTI Application: 06-07603
Issued: To be entered upon final issuance

Facility ID: 0616010006

Clow

PTI A

Emissions Unit ID: F007

Issued: To be entered upon final issuance

	<u>Applicable Emissions Limitations/Control Measures</u>	
OAC rule 3745-17-11(B)	<p>Particulate emissions (PE) from the baghouse stack serving emissions units F004, F007 and P007 shall not exceed 0.0075 gr/dscf (5.78 lb/hr).</p> <p>Emissions of particulate matter (PM) shall not exceed 0.38 lb/hr.</p> <p>Emissions of particulate matter less than 10 microns (PM₁₀) shall not exceed 0.26 lb/hr.</p> <p>Emissions of volatile organic compounds (VOC) shall not exceed 7.2 lbs/hr; 9.0 tons/ yr.</p> <p>Emissions of carbon monoxide (CO) from F007 and F009, combined, shall not exceed 27.0 lbs/hr.</p> <p>Visible emissions of fugitive dust not captured by the side draft hood shall not exceed 5% opacity as a six minute average.</p> <p>No visible particulate emissions shall be emitted from the baghouse stack.</p> <p>The permittee shall implement best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p> <p>The requirements of this rule also</p>	<p>include compliance with the requirements of OAC rule 3745-17-07(A).</p> <p>PM emissions shall not exceed 0.48 ton/yr as a rolling 12-month summation.</p> <p>PM₁₀ emissions shall not exceed 0.34 ton/yr as a rolling 12-month summation.</p> <p>Emissions of CO from F007 and F009, combined, shall not exceed 33.75 tons/yr as a rolling 12-month summation.</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>

Clow

PTI A

Emissions Unit ID: F007

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

- 2.a** This facility is located in Coshocton County, which is not identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions from this emissions unit are exempt from the fugitive dust control requirements and visible emission limitation established in OAC rules 3745-17-08(B) and 3745-17-07(B), respectively.

II. Operational Restrictions

1. The Jolt Line which includes Jolt Pouring and Cooling (F009), Jolt Shakeout (F007), and the Jolt Sand Plant (P007) shall be limited to the following annual production rates based on a rolling 12-month summation:
- a. 175,000 tons sand per year; and
 - b. 15,000 tons metal per year.

III. Monitoring and/or Recordkeeping Requirements

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

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

Clow

PTI A

Emissions Unit ID: F007

Issued: To be entered upon final issuance

actions that were taken to eliminate abnormal visible emissions.

2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total throughput of sand (in tons) of this emissions unit;
 - b. the total throughput of metal (in tons) of this emissions unit;
 - c. the rolling, 12-month summation of throughput, in tons of sand (i.e., the throughput for the current month added to the throughput for the previous 11 calendar months); and
 - d. the rolling, 12-month summation of throughput, in tons of metal (i.e., the throughput for the current month added to the throughput for the previous 11 calendar months).
3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the side draft hood serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall notify the Ohio EPA, Southeast District Office of any monthly record showing an exceedance of the rolling, 12-month throughput limitations specified in Section A.II.1. A copy of such record shall be sent to the Ohio EPA, Southeast District Office within 30 days following the end of the calendar month.
3. The permittee shall submit semiannual written reports that (a) identify all days 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 Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
Emissions of carbon monoxide (CO) from F007 and F009, combined, shall not exceed 27.0 lbs/hr.

Applicable Compliance Method:
Compliance shall be demonstrated based upon emissions testing in accordance with methods and procedures in Section A.V.2.
 - b. Emission Limitation:
Emissions of PM shall not exceed 0.38 lb/hr.
PM emissions shall not exceed 0.48 ton/yr as a rolling 12-month summation.

Clow

PTI A

Emissions Unit ID: F007

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be demonstrated using the following equations :

3.20 lb PE per ton of metal (based on emissions factor from FIRE 6.23 SCC
3-04-003-31)

maximum rate of 6 tons of metal per hour

limited to 15,000 tons of metal per year based on a rolling 12-month summation

99% capture efficiency (based on application information)

99% baghouse control efficiency

Stack Emissions

$(3.20 \text{ lbs/ton}) \times (6 \text{ tons/hr}) = 19.2 \text{ lbs/hr uncontrolled}$

$(19.2 \text{ lbs/hr}) \times (99\% \text{ capture}) \times (99\% \text{ control}) = 0.19 \text{ lb/hr}$

$(3.20 \text{ lbs/ton}) \times (15,000 \text{ tons/yr}) = 48,000 \text{ lbs/yr uncontrolled}$

$(48,000 \text{ lb/yr}) \times (99\% \text{ capture}) \times (99\% \text{ control}) \times (0.0005 \text{ ton/lb}) = 0.24 \text{ ton/yr}$

Fugitive Emissions

$(19.2 \text{ lbs/hr}) \times (1\% \text{ capture loss}) = 0.19 \text{ lb/hr}$

$(48,000 \text{ lb/yr}) \times (1\% \text{ capture loss}) \times (0.0005 \text{ ton/lb}) = 0.24 \text{ ton/yr}$

Total Emissions

$0.19 \text{ lb/hr} + 0.19 \text{ lb/hr} = 0.38 \text{ lb/hr}$

$0.24 \text{ ton/yr} + 0.24 \text{ ton/yr} = 0.48 \text{ ton/yr}$

c. Emission Limitation:

Emissions of PM_{10} shall not exceed 0.26 lb/hr.

PM_{10} emissions shall not exceed 0.34 ton/yr as a rolling 12-month summation..

Applicable Compliance Method:

Compliance shall be demonstrated using the following equations :

2.24 lb PM_{10} per ton of metal (based on emissions factor from FIRE 6.23 SCC
3-04-003-31)

tons of metal per year limited to 15,000 based on a rolling 12-month summation

maximum rate of 6 tons of metal per hour

99% capture efficiency (based on application information)

99% baghouse control efficiency

Stack Emissions

Clow Water Systems Co

Facility ID: 0616010006

PTI A

Issue

Emissions Unit ID: F007

$(2.24 \text{ lbs/ton}) \times (6 \text{ tons/hr}) = 13.44 \text{ lbs/hr uncontrolled}$

$(13.4 \text{ lbs/hr}) \times (99\% \text{ capture}) \times (99\% \text{ control}) = 0.13 \text{ lb/hr}$

$(2.24 \text{ lbs/ton.}) \times (15,000 \text{ tons/yr}) = 33,600 \text{ lb/yr uncontrolled}$

$(33,600 \text{ lb/yr}) \times (99\% \text{ capture}) \times (99\% \text{ control}) \times (0.0005 \text{ ton/lb}) = 0.17 \text{ ton/yr}$

Clow

PTI A

Emissions Unit ID: F007

Issued: To be entered upon final issuance

Fugitive Emissions

$(13.4 \text{ lbs/hr}) \times (1\% \text{ capture loss}) = 0.13 \text{ lb/hr}$

$(33,600 \text{ lbs/yr}) \times (1\% \text{ capture loss}) \times (0.0005 \text{ ton/lb}) = 0.17 \text{ ton/yr}$

Total Emissions

$0.13 \text{ lb/hr} + 0.13 \text{ lb/hr} = 0.26 \text{ lb/hr}$

$0.17 \text{ ton/yr} + 0.17 \text{ ton/yr} = 0.34 \text{ ton/yr}$

- d. Emission Limitation:
Emissions of VOC shall not exceed 7.2 lbs/hr; 9.0 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated using the following equations :

1.20 lb VOC per ton of metal (based on emissions factor from FIRE 6.23 SCC 3-04-003-31)

maximum rate of 6 tons of metal per hour

limited to 15,000 tons of metal per year based on a rolling 12-month summation uncontrolled

$(1.20 \text{ lb/ton}) \times (6 \text{ tons/hr}) = 7.2 \text{ lb/hr}$

$(1.20 \text{ lb/ton}) \times (15,000 \text{ tons/yr}) \times (0.0005 \text{ lb/t}) = 9 \text{ tons/yr}$

- e. Emission Limitation:
Emissions of carbon monoxide (CO) from F007 and F009, combined, shall not exceed 33.75 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated using the following equations :

4.50 lb CO per ton of metal (based on stack testing of a similar unit)

maximum rate of 6 tons of metal per hour;

limited to 15,000 tons of metal per year based on a rolling 12-month summation uncontrolled

$(4.50 \text{ lb/ton}) \times (6 \text{ tons/hr}) = 27.0 \text{ lbs/hr}$

$(4.50 \text{ lb/ton}) \times (15,000 \text{ tons/yr}) \times (0.0005 \text{ ton/lb}) = 33.75 \text{ tons/yr}$

- f. Emission Limitation:
Visible emissions of fugitive dust not captured by the side draft hood shall not

Clow

PTI A

Emissions Unit ID: F007

Issued: To be entered upon final issuance

exceed 5% opacity as a six minute average.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".

Clow

PTI A

Emissions Unit ID: F007

Issued: To be entered upon final issuance

- g. Emission Limitation:
No visible particulate emissions shall be emitted from the baghouse stack..

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to test Method 22 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 2002.

2. The permittee shall conduct, or have conducted, an emission test for this emissions unit within 6 months after the modification of the emission unit.

The emission testing shall be conducted to demonstrate that the baghouse serving emissions units F004, F007 and P007 is in compliance with the combined emissions limitation for PE. Emissions units F004, F007, P007 and any other emission units controlled by the baghouse shall all be operating at or near maximum operating rates during the test (unless otherwise specified or approved by the Ohio EPA, Southeast District Office).

Particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

No later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office's refusal to accept the results of the emission test(s).

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

Clow Water Systems Co
PTI A
Issue

Facility ID: 0616010006

Emissions Unit ID: F007

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

VI. Miscellaneous Requirements

None.

Clow

PTI A

Emissions Unit ID: F007

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>
F007 - Jolt Shakeout controlled with a baghouse (Chapter 31 modification)	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

Clow

PTI A

Emissions Unit ID: F007

Issued: To be entered upon final issuance

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

Clow

PTI A

Emissions Unit ID: F007

Issued: To be entered upon final issuance

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.

Clow

PTI A

Emissions Unit ID: F009

Issued: To be entered upon final issuance

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>
F009 - Jolt Pouring and Cooling (Chapter 31 modification)	OAC rule 3745-31-05(A)(3) OAC 3745-31-05(C)

Clow

PTI A

Emissions Unit ID: F009

Issued: To be entered upon final issuance

Applicable Emissions
Limitations/Control
Measures

Emissions of particulate matter (PM) shall not exceed 3.84 lbs/hr.

Emissions of particulate matter less than 10 microns (PM₁₀) shall not exceed 3.84 lbs/hr.

Emissions of volatile organic compounds (VOC) shall not exceed 1.2 lb/hr; 1.5 tons/yr.

Emissions of carbon monoxide (CO) from F007 and F009, combined, shall not exceed 27.0 lbs/hr.

Visible emissions of fugitive dust from the building enclosing this emissions unit shall not exceed 20 % opacity, as a three-minute average.

The permittee shall implement best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.

PM emissions shall not

exceed 4.8 tons/yr as a rolling 12-month summation.

PM₁₀ emissions shall not exceed 4.8 tons/yr.

Emissions of CO from F007 and F009, combined, shall not exceed 33.75 tons/yr as a rolling 12-month summation.

2. Additional Terms and Conditions

- 2.a** This facility is located in Coshocton County, which is not identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions from this emissions unit are exempt from the fugitive dust control requirements and visible emission limitation established in OAC rules 3745-17-08(B) and 3745-17-07(B), respectively.

II. Operational Restrictions

1. The Jolt Line which includes Jolt Pouring and Cooling (F009), Jolt Shakeout (F007), and the Jolt Sand Plant (P007) shall be limited to the following annual production rates based on a rolling 12-month summation:
- a. 175,000 tons sand per year; and
 - b. 15,000 tons metal per year.

III. Monitoring and/or Recordkeeping Requirements

1. 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 any building vent 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.

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

2. The permittee shall collect and record the following information each month for this emissions unit:

Clow

PTI A

Emissions Unit ID: F009

Issued: To be entered upon final issuance

- a. the total throughput of sand (in tons) of this emissions unit;
- b. the total throughput of metal (in tons) of this emissions unit;
- c. the rolling, 12-month summation of throughput, in tons of sand (i.e., the throughput for the current month added to the throughput for the previous 11 calendar months); and
- d. the rolling, 12-month summation of throughput, in tons of metal (i.e., the throughput for the current month added to the throughput for the previous 11 calendar months).

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from any building vent serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall notify the Ohio EPA, Southeast District Office of any monthly record showing an exceedance of the rolling, 12-month throughput limitations specified in Section A.II.1. A copy of such record shall be sent to the Ohio EPA, Southeast District Office within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
Emissions of PM/PM₁₀ shall not exceed 3.84 lbs/hr.
PM/PM₁₀ emissions shall not exceed 4.8 tons/yr as a rolling 12-month summation.

Clow

PTI A

Emissions Unit ID: F009

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be demonstrated using the following equations :

0.64 lb PM/PM₁₀ per ton of metal (based on emissions factor from stack test at Quality Castings, Orrville, Ohio)
maximum rate of 6 tons of metal per hour
limited to 15,000 tons of metal per year (based on a rolling 12-month summation)
uncontrolled

$$(0.64 \text{ lb/ton}) \times (6 \text{ tons/hr}) = 3.84 \text{ lbs/hr}$$

$$(0.64 \text{ lb/ton}) \times (15,000 \text{ tons/yr}) \times (0.0005 \text{ ton/lb}) = 4.8 \text{ tons/yr}$$

b. Emission Limitation:

Emissions of VOC shall not exceed 1.2 lb/hr; 1.5 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated using the following equations :

0.20 lb VOC per ton of metal (based on emissions factor from stack test at Wheeland Foundry)
maximum rate of 6 tons of metal per hour
limited to 15,000 tons of metal per year (based on a rolling 12-month summation)
uncontrolled

$$(0.20 \text{ lb/ton}) \times (6 \text{ tons/hr}) = 1.2 \text{ lb/hr}$$

$$(0.20 \text{ lb/ton}) \times (15,000 \text{ tons/yr}) \times (0.0005 \text{ lb/t}) = 1.5 \text{ tons/yr}$$

c. Emission Limitation:

Emissions of CO from F007 and F009, combined, shall not exceed 27.0 lb/hr.
Emissions of CO from F007 and F009, combined, shall not exceed 33.75 tons/yr
as a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated using the following equations :

4.50 lb CO per ton of metal (based on stack testing of a similar unit)
maximum rate of 6 tons of metal per hour;
limited to 15,000 tons of metal per year based on a rolling 12-month summation
uncontrolled

$$(4.50 \text{ lb/ton}) \times (6 \text{ tons/hr}) = 27.0 \text{ lbs/hr}$$

Clow Water Systems Co
PTI A
Issue

Facility ID: 0616010006

Emissions Unit ID: F009

$(4.50 \text{ lb/ton}) \times (15,000 \text{ tons/yr}) \times (0.0005 \text{ ton/lb}) = 33.75 \text{ tons/yr}$

- d. Emission Limitation:
Visible emissions of fugitive dust from the building enclosing this emissions unit shall not exceed 20 % opacity, as a three-minute average.

Clow

PTI A

Emissions Unit ID: F009

Issued: To be entered upon final issuance

Applicable Compliance Method:

If required, compliance with the emission limitations shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

VI. Miscellaneous Requirements

None.

Clow

PTI A

Emissions Unit ID: F009

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>
F009 - Jolt Pouring and Cooling (Chapter 31 modification)	None	None

2. Additional Terms and Conditions

- 2.a** None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit F009 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Benzene

TLV (ppm): 0.50

Clow

PTI A

Emissions Unit ID: F009

Issued: To be entered upon final issuance

Maximum Hourly Emission Rate (lbs/hr): 1.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 28.35

MAGLC (ug/m3): 45.6

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the

Clow Water Systems Co
PTI A
Issue

Facility ID: 0616010006

Emissions Unit ID: F009

"Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Clow

PTI A

Emissions Unit ID: F009

Issued: To be entered upon final issuance

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Clow

PTI A

Emissions Unit ID: P007

Issued: To be entered upon final issuance

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>
P007 - Jolt Sand System controlled with a baghouse (Chapter 31 modification)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)
	OAC rule 3745-17-07(A)
	OAC rule 3745-17-11(B)

Clow

PTI A

Emissions Unit ID: P007

Issued: To be entered upon final issuance

Applicable Emissions
Limitations/Control
Measures

Particulate emissions (PE) from the baghouse stack serving emissions units F004, F007 and P007 shall not exceed 0.0075 gr/dscf (5.78 lb/hr).

Emissions of particulate matter (PM) shall not exceed 5.38 lbs/hr.

Emissions of particulate matter less than 10 microns (PM₁₀) shall not exceed 0.54 lb/hr.

Visible emissions of fugitive dust not captured by the side draft hood shall not exceed 5% opacity as a six minute average.

No visible particulate emissions shall be emitted from the baghouse stack.

The permittee shall implement best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.

The requirements of this

rule also include compliance with the requirements of OAC rule 3745-17-07(A).

PM emissions shall not exceed 4.71 tons/yr as a rolling 12-month summation.

PM₁₀ emissions shall not exceed 0.71 ton/yr as a rolling 12-month summation.

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

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

2. Additional Terms and Conditions

- 2.a** This facility is located in Coshocton County, which is not identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions from this emissions unit are exempt from the fugitive dust control requirements and visible emission limitation established in OAC rules 3745-17-08(B) and 3745-17-07(B), respectively.

II. Operational Restrictions

1. The Jolt Line which includes Jolt Pouring and Cooling (F009), Jolt Shakeout (F007), and the Jolt Sand Plant (P007) shall be limited to the following annual production rates based on a rolling 12-month summation:
- a. 175,000 tons sand per year; and
 - b. 15,000 tons metal per year.

III. Monitoring and/or Recordkeeping Requirements

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

Issued: To be entered upon final issuance

- e. any corrective actions taken to minimize or eliminate the visible emissions.

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

2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total throughput of sand (in tons) of this emissions unit;
 - b. the total throughput of metal (in tons) of this emissions unit;
 - c. the rolling, 12-month summation of throughput, in tons of sand (i.e., the throughput for the current month added to the throughput for the previous 11 calendar months); and
 - d. the rolling, 12-month summation of throughput, in tons of metal (i.e., the throughput for the current month added to the throughput for the previous 11 calendar months).

The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during

Clow

PTI A

Emissions Unit ID: P007

Issued: To be entered upon final issuance

which any visible fugitive particulate emissions were observed from the side draft hood serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

Emissions Unit ID: P007

2. The permittee shall notify the Ohio EPA, Southeast District Office of any monthly record showing an exceedance of the rolling, 12-month throughput limitations specified in section A.II.1. A copy of such record shall be sent to the Ohio EPA, Southeast District Office within 30 days following the end of the calendar month.
3. The permittee shall submit semiannual written reports that (a) identify all days 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 Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

Particulate emissions (PE) from the baghouse stack serving emissions units F004, F007 and P007 shall not exceed 0.0075 gr/dscf (5.78 lb/hr).

Applicable Compliance Method:

Compliance shall be demonstrated based upon emissions testing in accordance with methods and procedures in Section A.V.2.

- b. Emission Limitation:

Emissions of PM shall not exceed 5.38 lb/hr.

PM emissions shall not exceed 4.71 tons/yr as a rolling 12-month summation. tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated using the following equations :

3.60 lbs PM per ton of sand (based on emissions factor from FIRE 6.23 SCC 3-04-003-50)

maximum rate of 100 tons of sand per hour

limited to 175,000 tons of sand per year (based on a rolling 12-month summation)

99.5% capture efficiency (based on application information)

99% baghouse control efficiency

Stack Emissions

$(3.60 \text{ lbs/ton}) \times (100 \text{ tons/hr}) = 360 \text{ lbs/hr uncontrolled}$

Clow

PTI A

Emissions Unit ID: P007

Issued: To be entered upon final issuance

$$(360 \text{ lbs/hr}) \times (99.5\% \text{ capture}) \times (99\% \text{ control}) = 3.58 \text{ lbs/hr}$$

$$(3.60 \text{ lbs/ton.}) \times (175,000 \text{ tons/yr}) = 630,000 \text{ lb/yr uncontrolled}$$
$$(630,000 \text{ lb/yr}) \times (99.5\% \text{ capture}) \times (99\% \text{ control}) \times (0.0005 \text{ ton/lb}) = 3.13 \text{ tons/yr}$$

Fugitive Emissions

$$(360 \text{ lbs/hr}) \times (0.5\% \text{ capture loss}) = 1.8 \text{ lbs/hr}$$

$$(630,000 \text{ lbs/yr}) \times (0.5\% \text{ capture loss}) \times (0.0005 \text{ ton/lb}) = 1.58 \text{ ton/yr}$$

Total Emissions

$$3.58 \text{ lbs/hr} + 1.8 \text{ lbs/hr} = 5.38 \text{ lbs/hr}$$

$$3.13 \text{ tons/yr} + 1.58 \text{ ton/yr} = 4.71 \text{ tons/yr}$$

c. Emission Limitation:

Visible emissions of fugitive dust not captured by the side draft hood shall not exceed 5% opacity as a six minute average.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".

d. Emission Limitation:

Emissions of PM₁₀ shall not exceed 0.54 lbs/hr.

PM₁₀ emissions shall not exceed 0.71 ton/yr.

Applicable Compliance Method:

Compliance shall be demonstrated using the following equations :

0.54 lb PM₁₀ per ton of sand (based on emissions factor from FIRE 6.23 SCC 3-04-003-50)

maximum rate of 100 tons of sand per hour

limited to 175,000 tons of sand per year (based on a rolling 12-month summation)

99.5% capture efficiency (based on application information)

99% baghouse control efficiency

Stack Emissions

$$(0.54 \text{ lb/ton.}) \times (100 \text{ tons/hr}) = 54 \text{ lbs/hr uncontrolled}$$

$$(54 \text{ lbs/hr}) \times (99.5\% \text{ capture}) \times (99\% \text{ control}) = 0.54 \text{ lb/hr}$$

Clow

PTI A

Emissions Unit ID: P007

Issued: To be entered upon final issuance

$$(0.54 \text{ lb/ton.}) \times (175,000 \text{ tons/yr}) = 94,500 \text{ lbs/yr uncontrolled}$$
$$(94,500 \text{ lbs/yr}) \times (99.5\% \text{ capture}) \times (99\% \text{ control}) \times (0.0005 \text{ t/lb}) = 0.47 \text{ ton/yr}$$

Fugitive Emissions

$$(54 \text{ lbs/yr}) \times (0.5\% \text{ capture loss}) = 0.003 \text{ lb/hr}$$

$$(94,500 \text{ lbs/yr}) \times (0.5\% \text{ capture loss}) \times (0.0005 \text{ ton/lb}) = 0.24 \text{ ton/yr}$$

Clow

PTI A

Emissions Unit ID: P007

Issued: To be entered upon final issuance

Total Emissions

$0.54 \text{ lb/hr} + 0.003 \text{ lb/hr} = 0.54 \text{ lb/hr}$

$0.47 \text{ ton/yr} + 0.24 \text{ ton/yr} = 0.71 \text{ ton/yr}$

e. Emission Limitation:

No visible particulate emissions shall be emitted from the baghouse stack.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to test Method 22 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 2002.

2. The permittee shall conduct, or have conducted, an emission test for this emissions unit within 6 months after the modification of the emission unit.

The emission testing shall be conducted to demonstrate that the baghouse serving emissions units F004, F007 and P007 is in compliance with the combined emissions limitation for PE. Emissions units F004, F007, P007 and any other emission units controlled by the baghouse shall all be operating at or near maximum operating rates during the test (unless otherwise specified or approved by the Ohio EPA, Southeast District Office).

Particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources".

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

No later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness

Clow Water Systems Co
PTI A
Issue

Facility ID: 0616010006

Emissions Unit ID: P007

the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

Clow

PTI A

Emissions Unit ID: P007

Issued: To be entered upon final issuance

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

VI. Miscellaneous Requirements

None.

Clow

PTI A

Emissions Unit ID: P007

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>
P007 - Jolt Sand System controlled with a baghouse (Chapter 31 modification)	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.

Clow

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: P007