



Street Address:

State of Ohio Environmental Protection Agency
Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

**RE: FINAL PERMIT TO INSTALL
COSHOCTON COUNTY
Application No: 06-06141**

CERTIFIED MAIL

DATE: 8/8/2000

SanCast Inc
Steve Conrad
535 Clow Lane
Coshocton, OH 43812-9782

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

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

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

Very truly yours,

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

CC: USEPA

SEDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: August 8, 2000
Effective Date: August 8, 2000**

FINAL PERMIT TO INSTALL 06-06141

Application Number: 06-06141
APS Premise Number: 0616010007
Permit Fee: **\$800**
Name of Facility: SanCast Inc
Person to Contact: Steve Conrad
Address: 535 Clow Lane
Coshocton, OH 43812-9782

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

**535 Clow Lane
Coshocton, Ohio**

Description of proposed emissions unit(s):

Rotating didion drum and conveyors.

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

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Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and 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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

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information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional

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facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

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

12. Best Available Technology

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

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

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

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14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	4.56
VOC	18.0
CO	15.0

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Emissions Unit ID: P905

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	OAC rule 3745-17-07(B)(1)
P905 - Rotating Didion Drum and conveyors.	OAC rule 3745-31-05 (A)(3)	
		OAC rule 3745-17-11(B)(1)

OAC rule 3745-31-05(D) and OAC rule 3745-35-07(B) (Synthetic Minor to avoid Title V)

OAC rule 3745-17-07 (A)

SanC**PTI****Issued: August 8, 2000**Emissions Unit ID: **P905**

Applicable Emissions
Limitations/Control Measures

Emissions of a particulate matter (PM)

shall not exceed 3.65 lb/hour from the stack; 4.56 TPY

The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-35-07(B), OAC rule 3745-17-07(A)(1) and 07 (B)(1).

best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See II.A.2.a. below.

Emissions of volatile organic compounds (VOC) shall not exceed 14.4 pounds per hour; 18.0 TPY.

Emissions of carbon monoxide (CO) shall not exceed 12.0 pounds per hour; 15.0 TPY.

See II.A.2.b. below

Visible particulate emissions shall not exceed 20% opacity from the stack, except as specified by rule.

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a three minute average.

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

SanC

PTI /

Issued: August 8, 2000

Emissions Unit ID: P905

2. Additional Terms and Conditions

- 2.a** The permittee shall minimize or eliminate visible particulate emissions of fugitive dust by employing best available control measures. These measures shall include, but not be limited to, the following:
- i. The installation and use of hoods, fans and other equipment to adequately enclose, contain, capture and vent the fugitive dust;
 - ii. The collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- 2.b** The maximum annual production rate for this emissions unit shall not exceed 30,000 tons of metal poured, based upon a rolling, 12-month summation of the production rates.

The permittee has existing data on which to base the 12-month total at the time this permit is issued.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 3-8 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall maintain monthly records of the following information:
 - a. The production rate for each month.
 - b. The rolling, 12-month summation of the production rates.

The permittee has existing data on which to base the 12-month total at the time this permit is issued.

SanC**PTI****Issued: August 8, 2000**Emissions Unit ID: **P905****D. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate limitation. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

E. Testing Requirements

1. Emissions Limitation:
Emissions of particulate matter (PM) shall not exceed 3.65 lbs/hour; 4.56 TPY.

Compliance Method:

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

- a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal.
- b. The emission testing shall be conducted to demonstrate compliance with the 3.65 lb/hour particulate emission limitation.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Southeast District Office.

Not 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

SanCast Inc**PTI****Issue****Facility ID: 0616010007**Emissions Unit ID: **P905**

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 District Office's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the 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.

Compliance with the 4.56 TPY particulate limit shall be demonstrated by multiplying the results of emissions testing above (in pounds per ton of metal poured) x the maximum production limitation of 30,000 tons per year x 0.0005 ton/lb.

2. Emissions Limitation:

Visible particulate emissions shall not exceed 20% opacity from the stack, except as specified by rule.

Compliance Method:

Compliance with the 20% opacity limit shall be determined using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

3. Emissions Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a three minute average.

Compliance Method:

Compliance with the 20% opacity limit shall be determined using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

For purposes of verifying compliance with the above visible emissions of fugitive dust requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows and roof monitors.

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4. Emissions Limitation:
Emissions of volatile organic compounds (VOC) shall not exceed 14.4 pounds per hour; 18.0 TPY.

Compliance Method:

Compliance with the 14.4 lb VOC/ hour emission limitation shall be determined by a one time calculation using the emissions factor from FIRE Version 6.22, Source Classification Codes and Emission Factor Listing For Criteria Air Pollutants, of 1.20 lb VOC per ton of metal poured, multiplied by the maximum hourly rate of this emissions unit in tons of metal poured per hour.

Compliance with the 18.0 TPY VOC emission limitation shall be determined by a one time calculation using the above emission factor x the maximum production limitation of 30,000 tons per year and 0.0005 ton/lb.

5. Emissions Limitation:
Emissions of carbon monoxide (CO) shall not exceed 12.0 pounds per hour; 15.0 TPY.

Compliance Method:

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

- a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal.
- b. The emission testing shall be conducted to demonstrate compliance with the 12.0 lb/hour carbon monoxide (CO) emission limitation.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 10 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Southeast District Office.

Not 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 District Office's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the 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.

Compliance with the 15.0 TPY CO shall be demonstrated by multiplying the results of emissions testing above (in pounds per ton of metal poured) x the maximum production limitation of 30,000 tons per year and 0.0005 ton/lb.

6. Compliance with the rolling 12-month production rate limitation shall be demonstrated by the monitoring and recordkeeping in Section II.C.2. of this permit.
7. Compliance with the best available control technology requirements of OAC rule 3745-31-05 for visible emissions of fugitive dust shall be demonstrated by implementation of the control measures in II.A.2.a. of this permit and compliance with the 20% opacity limitation for visible particulate emissions of fugitive dust in accordance with II.E.3.

F. Miscellaneous Requirements

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

NEW SOURCE REVIEW FORM B

PTI Number: 06-06141 Facility ID: 0616010007

FACILITY NAME SanCast Inc

FACILITY DESCRIPTION Rotating didion drum and conveyors. CITY/TWP Coshocton

SIC CODE 3321 SCC CODE 3-04-003-31 EMISSIONS UNIT ID P905

EMISSIONS UNIT DESCRIPTION Rotating didion drum and conveyors.

DATE INSTALLED not installed

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	1.22	4.56	3.65	4.56
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	4.8	18.0	14.4	18.0
Nitrogen Oxides					
Carbon Monoxide	attainment	4.0	15.0	12.0	15.0
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination AP-42 EF and emissions testing from similar facility; lb/hr and TPY emission limitations for all pollutants; 12-month rolling production limit; 20% opacity from stack and for fugitive emissions; best available technology to minimize or eliminate visible particulate emissions of fugitive dust.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS: