



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL
ERIE COUNTY
Application No: 03-13480**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 8/22/2000

G and C Foundry Company
Richard Babcock
PO Box 789 2806 West Monroe Street
Sandusky, OH 44870

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 Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Very truly yours,

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

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 8/22/2000
Effective Date: 8/22/2000**

FINAL PERMIT TO INSTALL 03-13480

Application Number: 03-13480

APS Premise Number: 0322020044

Permit Fee: **\$1800**

Name of Facility: G and C Foundry Company

Person to Contact: Richard Babcock

Address: PO Box 789 2806 West Monroe Street
Sandusky, OH 44870

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2806 W Monroe St
Sandusky, Ohio**

Description of proposed emissions unit(s):

Modification of Grind Shop (P905, was P008-added 2 additional grinders), installation of a high pressure sand blow-out station(P906), and 30-inch snag grinder (P907).

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

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 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. See B.11 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 to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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. 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.

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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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 this Permit To Install.

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 of 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, the State, and citizens 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 To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is

granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

B. State Only Enforceable 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 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 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. 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. 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.

5. 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.

6. Construction of New Sources(s)

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

7. 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.

8. 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).

9. 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.

10. 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.

11. 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., 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>
PM	7.1 TPY

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

NONE.

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

NONE.

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P905 - Grind Shop (previously permitted as P008) Modification (modification involves addition of two new grinders).	OAC 3745-31-05(A)(3)	<u>Stack Emissions</u> 0.02 gr PE/dscf, 1.01 lbs PE/hr, 4.42 TPY PE* Opacity restrictions (See A.I.2.b.) See A.I.2.a.
	OAC 3745-17-11(B)(3)	<u>Fugitive Emissions</u> 1.12 TPY PE Opacity restrictions (See A.I.2.c.) See A.I.2.a.
	OAC 3745-17-07(A)	None. See A.I.2.d.
	OAC 3745-17-07(B)	None. See A.I.2.e.
	OAC 3745-17-08(B)	None. See A.I.2.f.
		None. See A.I.2.g.

*All PE associated with the stack emissions is assumed to be PM₁₀.

2. Additional Terms and Conditions

- 2.a Best Available Technology (BAT) for this emissions unit has been determined to be use of a baghouse, and building enclosure for the control of fugitive emissions.
- 2.b Visible particulate emissions shall not exceed 20% opacity as a 6-minute average. The visible particulate emissions limitation shall not apply to the exceptions listed in OAC rule 3745-17-07(A)(3).

- 2.c** Visible particulate fugitive emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average. The visible particulate emission limitation shall not apply to the exception listed in OAC rule 3745-17-07(B)(11)(f).
- 2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Erie county.
- 2.e** This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.f** This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because this fugitive dust source is not located within the geographical areas specified in Appendix A of rule 3745-17-08.
- 2.g** This emissions unit is exempt from the requirements specified in OAC rule 3745-17-08(B), pursuant to OAC rule 3745-17-08(A)(1), because this fugitive dust source is not located within the geographical areas specified in Appendix A of rule 3745-17-08.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 8 to 10 inches of water while the emissions unit is in operation.

III. 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 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 on a weekly basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate fugitive emissions from the building containing this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible fugitive 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 emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit semiannual written reports which:
 - a. identify all days during which any visible particulate fugitive emissions were observed from the building containing this emissions unit, and
 - b. describe any corrective actions taken to eliminate the visible particulate fugitive emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
0.02 gr PE/dscf

Applicable Compliance Method:
The PE/dscf emission limitation was established in accordance with the maximum outlet concentration for the baghouse. If required, compliance with the PE/dscf emission limitation shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A.
 - b. Emissions Limitation:
1.01 lbs PE/hr, 4.42 TPY PE

Applicable Compliance Method:
Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet grain loading concentration of 0.02 gr PE/dscf by the maximum volumetric air flow 5,880 dscfm, and the appropriate conversion factors of 7000 grains/lb, 60 minutes/hr, 1 ton/2000 lbs, and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A.
 - c. Emissions Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average. The visible particulate emissions limitation shall not apply to the exceptions listed in OAC rule 3745-17-07(A)(3).

Applicable Compliance Method:

Visible emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

- d. Emissions Limitation:
1.12 TPY PE

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying the maximum process weight (31,010 tons gray iron/yr) by the appropriate emissions factor from An Inventory of Iron Foundry Emissions, Bernard S. Gutow, Modern Castings, January 1972 (1.6 lbs PE/ton gray iron), the percentage of emissions not captured by the control system (15%), a control efficiency for building enclosure (70%), and a conversion factor of 1 ton/2000 lbs.

- e. Emissions Limitation:

Visible particulate fugitive emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average. The visible particulate emission limitation shall not apply to the exception listed in OAC rule 3745-17-07(B)(11)(f).

Applicable Compliance Method:

Visible fugitive emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

NONE.

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>
P905 - Grind Shop (previously permitted as P008) Modification (modification involves addition of two new grinders).		

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.

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P906 - High pressure sand blowout station.	OAC 3745-31-05(A)(3)	<u>Stack Emissions</u> 0.01 gr PE/dscf, 0.13 lbs PE/hr, 0.57 TPY PE* Opacity restrictions (See A.I.2.b.) See A.I.2.a.
		<u>Fugitive Emissions</u> 0.27 TPY PE Opacity restrictions (See A.I.2.c.) See A.I.2.a.
	OAC 3745-17-11(B)(3)	None. See A.I.2.d.
	OAC 3745-17-07(A)	None. See A.I.2.e.
	OAC 3745-17-07(B)	None. See A.I.2.f.
	OAC 3745-17-08(B)	None. See A.I.2.g.

*All PE associated with the stack emissions is assumed to be PM₁₀.

2. Additional Terms and Conditions

- 2.a Best Available Technology (BAT) for this emissions unit has been determined to be use of a baghouse, and building enclosure for the control of fugitive emissions.
- 2.b Visible particulate emissions from the stack of this emissions unit shall not exceed 20% opacity as a 6-minute average. The visible particulate emissions limitation shall not apply to the exceptions listed in OAC rule 3745-17-07(A)(3).
- 2.c Visible particulate fugitive emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average. The visible particulate emission limitation shall not apply to the exception listed in OAC rule 3745-17-07(B)(11)(f).

- 2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Erie county.
- 2.e** This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.f** This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because this fugitive dust source is not located within the geographical areas specified in Appendix A of rule 3745-17-08.
- 2.g** This emissions unit is exempt from the requirements specified in OAC rule 3745-17-08(B), pursuant to OAC rule 3745-17-08(A)(1), because this fugitive dust source is not located within the geographical areas specified in Appendix A of rule 3745-17-08.

II. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 8 to 10 inches of water while the emissions unit is in operation.

III. 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 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 on a weekly basis.
- 2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate fugitive emissions from the building containing this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible fugitive 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 emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit semiannual written reports which:
 - a. identify all days during which any visible particulate fugitive emissions were observed from the building containing this emissions unit, and
 - b. describe any corrective actions taken to eliminate the visible particulate fugitive emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
0.01 gr PE/dscf

Applicable Compliance Method:
The PE/dscf emission limitation was established in accordance with the maximum outlet concentration for the baghouse. If required, compliance with the PE/dscf emission limitation shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A.
 - b. Emissions Limitation:
0.13 lbs PE/hr, 0.57 TPY PE

Applicable Compliance Method:

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet grain loading concentration of 0.01 gr PE/dscf by the maximum volumetric air flow 1,500 acfm, and the appropriate conversion factors of 7000 grains/lb, 1 dscf/acfm, 60 minutes/hr, 1 ton/2000 lbs, and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A.

- c. Emissions Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average. The visible particulate emission limitation shall not apply to the exceptions listed in OAC rule 3745-17-07(A)(3).
- Applicable Compliance Method:
Visible emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
- d. Emissions Limitation:
0.27 TPY PE
- Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation by multiplying the maximum process weight (7,446 tons gray iron/yr) by the appropriate emissions factor from An Inventory of Iron Foundry Emissions, Bernard S. Gutow, Modern Castings, January 1972 (1.6 lbs PE/ton gray iron), the percentage of emissions not captured by the control system (15%), a control efficiency for building enclosure (70%), and a conversion factor of 1 ton/2000 lbs.
- e. Emissions Limitation:
Visible particulate fugitive emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average. The visible particulate emission limitation shall not apply to the exception listed in OAC rule 3745-17-07(B)(11)(f).
- Applicable Compliance Method:
Visible fugitive emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

NONE.

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>
P906 - High pressure sand blowout station.		

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.

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P907 - 30-inch snag grinder.	OAC 3745-31-05(A)(3)	<u>Stack Emissions</u> 0.01 gr PE/dscf, 0.13 lbs PE/hr, 0.57 TPY PE* Opacity restrictions (See A.I.2.b.) See A.I.2.a.
		<u>Fugitive Emissions</u> 0.15 TPY PE Opacity restrictions (See A.I.2.c.) See A.I.2.a.
	OAC 3745-17-11(B)(3)	None. See A.I.2.d.
	OAC 3745-17-07(A)	None. See A.I.2.e.
	OAC 3745-17-07(B)	None. See A.I.2.f.
	OAC 3745-17-08(B)	None. See A.I.2.g.

*All PE associated with the stack emissions is assumed to be PM₁₀.

2. Additional Terms and Conditions

- 2.a Best Available Technology (BAT) for this emissions unit has been determined to be use of a baghouse, and building enclosure for the control of fugitive emissions.
- 2.b Visible particulate emissions from the stack of this emissions unit shall not exceed 20% opacity as a 6-minute average. The visible particulate emissions limitation shall not apply to the exceptions listed in OAC rule 3745-17-07(A)(3).
- 2.c Visible particulate fugitive emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average. The visible particulate emission limitation shall not apply to the exception listed in OAC rule 3745-17-07(B)(11)(f).

- 2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Erie county.
- 2.e** This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.f** This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because this fugitive dust source is not located within the geographical areas specified in Appendix A of rule 3745-17-08.
- 2.g** This emissions unit is exempt from the requirements specified in OAC rule 3745-17-08(B), pursuant to OAC rule 3745-17-08(A)(1), because this fugitive dust source is not located within the geographical areas specified in Appendix A of rule 3745-17-08.

II. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 8 to 10 inches of water while the emissions unit is in operation.

III. 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 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 on a weekly basis.
- 2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate fugitive emissions from the building containing this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible fugitive 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 emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit semiannual written reports which:
 - a. identify all days during which any visible particulate fugitive emissions were observed from the building containing this emissions unit, and
 - b. describe any corrective actions taken to eliminate the visible particulate fugitive emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
0.01 gr PE/dscf

Applicable Compliance Method:
The PE/dscf emission limitation was established in accordance with the maximum outlet concentration for the baghouse. If required, compliance with the PE/dscf emission limitation shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A.
 - b. Emissions Limitation:
0.13 lbs PE/hr, 0.57 TPY PE

Applicable Compliance Method:
Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet grain loading concentration of 0.01 gr PE/dscf by the maximum volumetric air flow 1,500 acfm, and the appropriate conversion factors of 7000 grains/lb, 1 dscf/acfm, 60 minutes/hr, 1 ton/2000 lbs, and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A.

- c. Emissions Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average. The visible particulate emission limitation shall not apply to the exceptions listed in OAC rule 3745-17-07(A)(3).
- Applicable Compliance Method:
Visible emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.
- d. Emissions Limitation:
0.15 TPY PE
- Applicable Compliance Method:
The permittee shall demonstrate compliance with this emission limitation by multiplying the maximum process weight (4,117 tons gray iron/yr) by the appropriate emissions factor from An Inventory of Iron Foundry Emissions, Bernard S. Gutow, Modern Castings, January 1972 (1.6 lbs PE/ton gray iron), the percentage of emissions not captured by the control system (15%), a control efficiency for building enclosure (70%), and a conversion factor of 1 ton/2000 lbs.
- e. Emissions Limitation:
Visible particulate fugitive emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average. The visible particulate emission limitation shall not apply to the exception listed in OAC rule 3745-17-07(B)(11)(f).
- Applicable Compliance Method:
Visible fugitive emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

NONE.

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>
P907 - 30-inch snag grinder.		

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.

NEW SOURCE REVIEW FORM B

PTI Number: 03-13480

Facility ID: 0322020044

FACILITY NAME G and C Foundry Company

FACILITY DESCRIPTION Gray Iron Foundry. CITY/TWP Sandusky

SIC CODE 3321 SCC CODE _____ EMISSIONS UNIT ID P905

EMISSIONS UNIT DESCRIPTION Grind Shop (previously permitted as P008) Modification (addition of two new grinders).

DATE INSTALLED 10/00 (projected)

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	1.01 lbs PM/hr	4.42 TPY PM	1.01 lbs PE/hr	4.42 TPY PM
Fugitive PM	attainment		1.12 TPY PM		1.12 TPY PM
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
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 Use of a baghouse, building enclosure for control of fugitive dust, and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 03-13480

Facility ID: 0322020044

FACILITY NAME G and C Foundry Company

FACILITY DESCRIPTION Gray Iron Foundry. CITY/TWP Sandusky

SIC CODE 3321 SCC CODE _____ EMISSIONS UNIT ID P906

EMISSIONS UNIT DESCRIPTION High pressure sand blowout station.

DATE INSTALLED 5/00

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	0.13 lbs PE/hr	0.57 TPY PM	0.13 lbs PE/hr	0.57 TPY PM
Fugitive PM	attainment		0.27 TPY PM		0.27 TPY PM
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
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 Use of a baghouse, building enclosure for control of fugitive dust, and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 03-13480

Facility ID: 0322020044

FACILITY NAME G and C Foundry Company

FACILITY DESCRIPTION Gray Iron Foundry. CITY/TWP Sandusky

SIC CODE 3321 SCC CODE _____ EMISSIONS UNIT ID P907

EMISSIONS UNIT DESCRIPTION 30-inch snag grinder.

DATE 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	0.13 lbs PE/hr	0.57 TPY PM	0.13 lbs PE/hr	0.57 TPY PM
Fugitive PM	attainment		0.15 TPY PM		0.15 TPY PM
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
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 Use of a baghouse, building enclosure for control of fugitive dust, and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 03-13480

Facility ID: 0322020044

FACILITY NAME G and C Foundry CompanyFACILITY DESCRIPTION Gray Iron Foundry.CITY/TWP Sandusky**Ohio EPA Permit to Install Information Form**

Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

<i>Please fill out the following. If the checkbox does not work, replace it with an 'X'</i>	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

[See Permit Review Form \(calculations\).](#)

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install **ENTER PTI NUMBER HERE**

A. Source Description

B. Facility Emissions and Attainment Status

C. Source Emissions

D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

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

Pollutant

Tons Per Year

PM

7.1 TPY

NEW SOURCE REVIEW FORM B

PTI Number: 03-13480

Facility ID: 0322020044

FACILITY NAME G and C Foundry Company

FACILITY DESCRIPTION Gray Iron Foundry.

CITY/TWP Sandusky

