OhioEPA

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: DRAFT PERMIT TO INSTALL
COSHOCTON COUNTY
Application No: 06-08238
Fac ID: 0616010006

CERTIFIED MAIL

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

DATE: 12/19/2006

Clow Water Systems Co
Heather Klesch
PO Box 6001 2266 South 6th St
Coshocton, 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 for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$3000** 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**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: To be entered upon final issuance**
Terms and Conditions	**Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 06-08238

Application Number:	06-08238
Facility ID:	0616010006
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Clow Water Systems Co
Person to Contact:	Heather Klesch
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):
New permit for Mold Peener (P035), Pipe Blowout (P036), Mold Blast (P037) and Mold Grinding Delvo No. 2 (P038); all four sources vented to one outdoor baghouse (dust collector 250.G1)

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 (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 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

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 <u>Federally Enforceable</u> 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

Pollutant	Tons Per Year
Particulate Emissions (PE)	< 40.0

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. The facility is subject to 40 CFR Part 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants: Miscellaneous Metal Parts and Products and 40 CFR Part 63, Subpart EEEEE, National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries. 40 CFR Part 63 Subpart MMMM applies to any facility engaged in the surface coating of any miscellaneous metal parts or products, and if application of coating to a substrate occurs, then surface coating also includes associated activities such as surface preparation, cleaning, mixing, and storage. 40 CFR Part 63 Subpart EEEEE applies to all parts of the facility engaged in the following operations: metal melting furnaces, scrap preheaters, pouring areas, pouring stations, automated conveyor and pallet cooling lines that use a sand mold system, automated shakeout lines that use a sand mold system, and mold and core making lines. The final rule also covers fugitive emissions from foundry operations. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subparts MMMM and EEEEE.

   The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions). Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subparts A, MMMM, and EEEEE.

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.

Operations, Property, and/or Equipment - P035 - Mold peener vented to a baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule3745-31-05(C)	Particulate emissions (PE) shall be less than 10.0 tons/yr. See section A.I.2.a below.
OAC rule 3745-17-07(A)(1)	Visible particulate emissions (PE) from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
OAC rule 3745-17-11(B)	PE shall not exceed 4.6 pounds per hour.

2. Additional Terms and Conditions

2.a Permit to Install 06-08238 for this air contaminant source takes into account the use of a baghouse system when this air contaminant source is in operation with a design control efficiency of 0.010 gr/dscf as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. 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. 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.

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 the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or 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.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emissions Limitation:

PE shall be less than10.0 tons/yr

Applicable Compliance Method:
The permittee may demonstrate compliance with the annual allowable PE limitation above by multiplying the maximum hourly controlled PE rate [(13 pounds/hr) x (1 - 0.9) = 1.3 lbs/hr] by the maximum annual number of hours of operation (8760 hours/yr), and then dividing by 2000 lbs/ton.

b. Emissions Limitation:

Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emissions Limitation:

PE shall not exceed 4.6 pounds/hour.

Applicable Compliance Method:

If required, 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".

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.

Operations, Property, and/or Equipment - P035 - Mold peener vented to baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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

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.

Operations, Property, and/or Equipment - P036 - Mold blaster vented to baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	Particulate emissions (PE) shall be less than 10.0 tons/yr. See section A.I.2.a below.
OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
OAC rule 3745-17-11(B)	PE shall not exceed 9.7 pounds per hour.

2. Additional Terms and Conditions

2.a Permit to Install 06-08238 for this air contaminant source takes into account the use of a baghouse system when this air contaminant source is in operation with a design control efficiency of 0.010 gr/dscf as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. 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. 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.

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 the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or 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.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emissions Limitation:

PE shall be less than10.0 tons/yr

Applicable Compliance Method:

Compliance with the ton per year limit shall be based upon the following:

tons PE/year = (0.010 gr/dscf) X (combined flow rate of all baghouses (dscf/min)) X (lb/7000 gr) X (60 min/hour) X (ton/2000 lbs) X (actual hours of operation/year)

b. Emissions Limitation:

Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emissions Limitation:

Particulate emissions (PE) shall not exceed 9.7 pounds/hour.

Applicable Compliance Method:

If required, 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".

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.

Operations, Property, and/or Equipment - P036 - Mold blaster vented to baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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

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.

Operations, Property, and/or Equipment - P037 - Pipe blowout vented to baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	Particulate emissions (PE) shall be less than 10.0 tons/yr. See section A.I.2.a below.
OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
OAC rule 3745-17-11(B)	PE shall not exceed 49.7 pounds per hour.

2. Additional Terms and Conditions

2.a Permit to Install 06-08238 for this air contaminant source takes into account the use of a baghouse system when this air contaminant source is in operation with a design control efficiency of 0.010 gr/dscf as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. 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. 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.

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 the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or 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.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emissions Limitation:

PE shall be less than10.0 tons/yr

Applicable Compliance Method:

Compliance with the ton per year limit shall be based upon the following:

tons PE/year = (0.010 gr/dscf) X (combined flow rate of all baghouses (dscf/min)) X (lb/7000 gr) X (60 min/hour) X (ton/2000 lbs) X (actual hours of operation/year)

b. Emissions Limitation:

Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emissions Limitation:

PE shall not exceed 49.7 pounds/hour.

Applicable Compliance Method:

If required, 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".

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.

Operations, Property, and/or Equipment - P037 - Pipe blowout vented to baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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

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.

Operations, Property, and/or Equipment - P038 - Mold grinder vented to baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	Particulate emissions (PE) shall be less than 10.0 tons/yr. See section A.I.2.a below.
OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
OAC rule 3745-17-11(B)	PE shall not exceed 7.4 pounds per hour.

2. Additional Terms and Conditions

2.a Permit to Install 06-08238 for this air contaminant source takes into account the use of a baghouse system when this air contaminant source is in operation with a design control efficiency of 0.010 gr/dscf as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. 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. 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.

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 the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or 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.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emissions Limitation:

PE shall be less than10.0 tons/yr

Applicable Compliance Method:

Compliance with the ton per year limit shall be based upon the following:

tons PE/year = (0.010 gr/dscf) X (combined flow rate of all baghouses (dscf/min)) X (lb/7000 gr) X (60 min/hour) X (ton/2000 lbs) X (actual hours of operation/year)

b. Emissions Limitation:

Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emissions Limitation:

PE shall not exceed 7.4 pounds/hour.

Applicable Compliance Method:

If required, 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".

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.

Operations, Property, and/or Equipment - P038 - Mold grinder vented to baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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

NEW SOURCE REVIEW FORM B

PTI Number: 06-08238 Facility ID: 0616010006

FACILITY NAME Clow Water Systems Company

FACILITY DESCRIPTION New permit for Mold Peener (P035), Pipe Blowout (P036), Mold Blast (P037) and Mold Grinding Delvo No. 2 (P038); all four sources vented to one outdoor baghouse (dust collector 250.G1)

CITY/TWP Coshocton

SIC CODE 3321 SCC CODE 3-09-03-004 EMISSIONS UNIT ID P035

EMISSIONS UNIT DESCRIPTION Mold peener vented to baghouse (dust collector 250.G1)

DATE INSTALLED P035 complete

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	0.010 gr/dscf		4.6 lbs/hr	10
PM_{10}					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? MMMM and EEEEE PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Clow Water Systems has requested a voluntary restriction under OAC rule 3745-31-02(A)(2) to require these sources to be operated with the use of baghouse 250.G1 with a design control efficiency of 0.010 gr/dscf for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

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: 06-08238 Facility ID: 0616010006

FACILITY NAME Clow Water Systems Co

FACILITY DESCRIPTION New permit for Mold Peener (P035), Pipe Blowout (P036), Mold Blast (P037) and Mold Grinding Delvo No. 2 (P038); all four sources vented to one outdoor baghouse (dust collector 250.G1)

CITY/TWP Coshocton

SIC CODE 3321 SCC CODE 3-09-00-201 EMISSIONS UNIT ID P036

EMISSIONS UNIT DESCRIPTION Mold blaster vented to baghouse (dust collector 250.G1)

DATE INSTALLED after PTI issuance

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	0.010 gr/dscf		9.7 lbs/hr	10
PM_{10}					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? MMMM and EEEEE PSD? No OFFSET POLICY? No

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Clow Water Systems has requested a voluntary restriction under OAC rule 3745-31-02(A)(2) to require these sources to be operated with the use of baghouse 250.G1 with a design control efficiency of 0.010 gr/dscf for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

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: 06-08238 Facility ID: 0616010006

FACILITY NAME Clow Water Systems Co

FACILITY DESCRIPTION New permit for Mold Peener (P035), Pipe Blowout (P036), Mold Blast (P037) and Mold Grinding Delvo No. 2 (P038); all four sources vented to one outdoor baghouse (dust collector 250.G1)

CITY/TWP Coshocton

SIC CODE 3321 SCC CODE 3-09-001-98 EMISSIONS UNIT ID P037

EMISSIONS UNIT DESCRIPTION Pipe blowout vented to baghouse (dust collector 250.G1)

DATE INSTALLED P037 complete

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	0.010 gr/dscf		49.7 lbs/hr	10
PM_{10}					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? MMMM and EEEEE PSD? No OFFSET POLICY? No

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Clow Water Systems has requested a voluntary restriction under OAC rule 3745-31-02(A)(2) to require these sources to be operated with the use of baghouse 250.G1 with a design control efficiency of 0.010 gr/dscf for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

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: 06-08238 Facility ID: 0616010006

FACILITY NAME Clow Water Systems Co

FACILITY DESCRIPTION New permit for Mold Peener (P035), Pipe Blowout (P036), Mold Blast (P037) and Mold Grinding Delvo No. 2 (P038); all four sources vented to one outdoor baghouse (dust collector 250.G1)

CITY/TWP Coshocton

SIC CODE 3321 SCC CODE 3-09-03-004 EMISSIONS UNIT ID P038

EMISSIONS UNIT DESCRIPTION Mold grinder vented to baghouse (dust collector 250.G1)

DATE INSTALLED P038 complete

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	0.010 gr/dscf		7.4 lbs/hr	10
PM_{10}					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? MMMM and EEEEE PSD? No OFFSET POLICY? No

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

Clow Water Systems has requested a voluntary restriction under OAC rule 3745-31-02(A)(2) to require these sources to be operated with the use of baghouse 250.G1 with a design control efficiency of 0.010 gr/dscf for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

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: