

X Synthetic Minor Determination and/or Netting Determination
Permit To Install **01-01288**

A. Source Description

Liberty Casting Company operates a Title V grey iron foundry located in Delaware County at 550 South Liberty Road. Liberty Casting Company proposes to voluntarily limit their emissions of PE by maintaining the existing facility-wide melt rate limitation and applying it to this replacement furnace. In addition, consistent with previous requirements, this furnace will be required to install and use a furnace lid with a control efficiency of at least 80% control of particulate emissions (PE) emissions.

B. Facility Emissions and Attainment Status

Liberty Casting Company is currently classified as a Title V facility. Delaware County is considered attainment for PE and particulate matter less than 10 microns in diameter (PM10), but non-attainment for particulate matter less than 2.5 microns in diameter (PM2.5). Current federal guidance is informing Ohio EPA to treat PM2.5 emissions for purposes of non-attainment review for PM2.5 as if they are PM10 emissions. Although Liberty Casting Company is currently classified as a Title V facility (Liberty Casting Company has chosen to be a Title V facility. Title V emissions over 100 tons per year.), Liberty Casting Company has existing records and information to document that their current facility wide potential emissions are 89.2 tons per year of PM10 before installing the replacement furnace. Therefore for purposes of major stationary source non-attainment review, Liberty Casting Company is not a major stationary source.

C. Source Emissions

This permit allows the replacement of an existing 2 ton/hr electric induction furnace with a 5.5 ton/hr electric induction furnace. The existing melt rate limitation for the facility will be maintained at 30,000 tons per rolling, 12-month period and a furnace lid with at least 80% control efficiency will be required for this emission unit. The operational restrictions will effectively limit the potential to emit (PTE) as follows:

Pre PTE:

P054 =	21.7 tons PE per year
	20.7 tons PM10 per year
P027, P034 and P036 combined =	2.7 tons PE per rolling, 12-month period
	2.6 tons PM10 per rolling, 12-month period
Total =	24.4 tons PE per year
	23.3 tons PM10 per year

Post PTE:

P054, P027, P034 and P036 combined =	2.7 tons PE per rolling, 12-month period
	2.6 tons PM10 per rolling, 12-month period

D. Conclusion

Liberty Casting Company wants to and will maintain these Synthetic Minor limitations by limitations on the amount of metal melted for emission units P054, P027, P034 and P036 combined to maintain minor non-attainment review stationary source status. In addition, P054 is required to use a furnace lid with at least 80% capture efficiency. These restrictions will effectively restrict the facility-wide PTE of PE, PM10, and PM2.5 emissions to less 100 tons per year and therefore this permitting action is mainly a state permitting action. It will not trigger any federal regulations. To validate that fact, monitoring, record keeping and calculations, along with quarterly and annual reports for units P054, P027, P034 and P036 combined, will be required to monitor compliance of the PE and PM10 emissions mentioned above.



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 01-01288

Fac ID: 0121010003

DATE: 8/4/2005

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

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1000** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

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

CC: USEPA

CDO

DELAWARE COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **01-01288** FOR AN AIR CONTAMINANT SOURCE
FOR **Liberty Casting Company**

On 8/4/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Liberty Casting Company**, located at **PO Box 1368, Delaware, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-01288:

Induction furnace system P031.

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

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



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 01-01288

Application Number: 01-01288
Facility ID: 0121010003
Permit Fee: **To be entered upon final issuance**
Name of Facility: Liberty Casting Company
Person to Contact: Renee Olney
Address: 550 Liberty Road
Delaware, OH 43015

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

**PO Box 1368
Delaware, Ohio**

Description of proposed emissions unit(s):

Induction furnace system P031.

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

Liberty Casting Company
PTI Application: 01-01288

Facility ID: 0121010003

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

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

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reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.8 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain,

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the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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7. Fees

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

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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

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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

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"modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

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

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of

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

5. Construction of New Sources(s)

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

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

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

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device

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Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	2.7

Liberty Casting Company
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Issued: To be entered upon final issuance

Facility ID: 0121010003

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PTI A

Emissions Unit ID: P054

Issued: To be entered upon final issuance

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>
P054 - 5.5 tons/hr electric induction furnace (LRFU3)	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.98 lb/hr. Visible fugitive particulate emissions shall not exceed 10% opacity as a 3-minute average from any non-stack egress point. See Part III.A.I.2.a-b and A.II.2 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A).
	OAC rule 3745-31-02(A) (voluntary synthetic minor limit)	See Part III.A.I.2.c and A.II.1 below.
	OAC rule 3745-17-08(B)	See Part III.A.I.2.d below.
	OAC rule 3745-17-07(B)	See Part III.A.I.2.e below.

2. Additional Terms and Conditions

- 2.a The 0.98 lb PE/hr emission limitation was written to reflect the potential to emit of this emissions unit. Therefore, record keeping and reporting requirements are not necessary to demonstrate compliance with this emission limitation.
- 2.b The permittee shall employ reasonably available control measures to minimize or eliminate visible emissions of fugitive dust from the furnace operation.

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PTI A**

Emissions Unit ID: P054

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- 2.c** PE from emission units P027 (LRFU1 and LRFU2), P054 (LRFU3), P034 (LRFU5) and P036 (LRFU4) combined shall not exceed 2.7 tons per rolling, 12-month period.
- 2.d** Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- 2.e** Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.

II. Operational Restrictions

- 1. The maximum amount of metal melted shall not exceed 30,000 tons per rolling, 12-month summation, based upon a rolling, 12-month summation of the metal melting rate for emission units P027 (LRFU1 and LRFU2), P054 (LRFU3), P034 (LRFU5) and P036 (LRFU4) combined.
- 2. A furnace lid with a particulate control efficiency of at least 80% shall be used in accordance with the manufacturers recommendations on emission unit P054 (LRFU3) at all times the unit is in operation.

III. Monitoring and/or Record keeping Requirements

- 1. The permittee shall maintain monthly records of the following information:
 - a. the total metal melted in emission units P027 (LRFU1 and LRFU2), P054 (LRFU3), P034 (LRFU5) and P036 (LRFU4) combined (tons);
 - b. the rolling, 12-month summation of the total metal melted from emission units P027 (LRFU1 and LRFU2), P054 (LRFU3), P034 (LRFU5) and P036 (LRFU4) combined (tons); and
 - c. the rolling, 12-month summation of the total particulate emissions, in tons, from emission units P027 (LRFU1 and LRFU2), P054 (LRFU3), P034 (LRFU5) and P036 (LRFU4) combined [$b \times 0.90$ lb/ton of metal melted (AP-42, Table 12.10-3, 01/95) * 1 ton/2000 lbs * furnace lid control efficiency (1-0.80) (PTI application submitted 05/31/05)].
- 2. The permittee shall maintain records that document all time periods during which the furnace lid was not in operated in accordance with the manufacturers recommendations

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when the emissions unit was in operation.

3. The permittee shall perform daily checks, when the emissions unit is charged or tapped during day light and when the weather conditions allow, for visible fugitive particulate emissions from the non-stack egress points from the building housing this emissions unit. These egress points shall include, but not be limited to: doorways and windows. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location 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 visible 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 deviation (excursion) reports which note the following:
 - a. identify all days during which visible fugitive particulate emissions were observed from any non-stack egress point from the building housing this emissions unit;
 - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions from the building housing this emissions unit;
 - c. all exceedances of the rolling, 12-month summation limitation for total metal melted, in tons, from emission units P027 (LRFU1 and LRFU2), P054 (LRFU3), P034 (LRFU5) and P036 (LRFU4) combined; and
 - d. all exceedances of the rolling, 12-month summation limitation for total particulate emissions, in tons, from emission units P027 (LRFU1 and LRFU2), P054 (LRFU3), P034 (LRFU5) and P036 (LRFU4) combined.

These reports are due by the date described in Part I - General Terms and Conditions of this permit under Section A.

2. The permittee shall notify the Central District Office in writing of any record showing that the furnace lid was not in operated in accordance with the manufacturers recommendations when the emissions unit was in operation. The notification shall

Emissions Unit ID: P054

include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
Visible fugitive particulate emissions shall not exceed 10% opacity as a 3-minute average.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).
 - b. Emission Limitation:
PE shall not exceed 0.98 lb/hr.

Applicable Compliance Method:
Compliance may be demonstrated by multiplying the maximum capacity of 5.5 tons of metal melted per hour (PTI application submitted 05/31/05) by the emission factor of 0.90 pounds of PE per ton of metal melted (AP-42, Table 12.10-3, 01/95) by the control efficiency of the furnace lid (1-0.80) (PTI application submitted 05/31/05).
 - c. Emission Limitation:
PE from emission units P027 (LRFU1 and LRFU2), P054 (LRFU3), P034 (LRFU5) and P036 (LRFU4) combined shall not exceed 2.7 tons per rolling, 12-month period.

Applicable Compliance Method:
See Part III.A.III.1 above.

VI. Miscellaneous Requirements

None

**Liberi
PTI A**

Emissions Unit ID: P054

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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>
P054 - 5.5 tons/hr electric induction furnace (LRFU3)	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