# **Iowa Department of Natural Resources Title V Operating Permit**

Name of Permitted Facility: John Deere Foundry Waterloo

Facility Location: 2000 Westfield Avenue

Waterloo, IA 50701

Air Quality Operating Permit Number: 02-TV-012R3

**Expiration Date: 03/23/28** 

Permit Renewal Application Deadline: 09/23/27

**EIQ Number: 92-1317** 

Facility File Number: 07-01-010

#### **Responsible Official**

Paul Garcia
Manager Foundry Operations
John Deere Foundry Waterloo
PO Box 270
Waterloo, IA 50704
Phone #: (319) 292-7876

#### **Permit Contact Person for the Facility**

Lain Pacini Senior Regulatory Specialist John Deere Foundry Waterloo P.O. Box 270 Waterloo, IA 50704 Phone #: (319) 292-6074

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit. Separate Title V Permits have been issued for John Deere Waterloo Works – Drive Train Operations, John Deere Tractor Cab Assembly Operations, John Deere Waterloo – Coating Service Center and John Deere Foundry which all are considered one stationary source. This permit is for John Deere Foundry Waterloo.

#### For the Director of the Department of Natural Resources

Marnie Stein, Supervisor of Air Operating Permits Section

Date

ZLP 1 02-TV-012R3, 03/24/23

# **Table of Contents**

I.	Facility Description and Equipment List4
II.	Plant - Wide Conditions9
III.	Emission Point Specific Conditions
IV.	Compliance Assurance Monitoring (CAM)
V.	General Conditions107
	G1. Duty to Comply
	G2. Permit Expiration
	G3. Certification Requirement for Title V Related Documents
	G4. Annual Compliance Certification
	G5. Semi-Annual Monitoring Report
	G6. Annual Fee
	G7. Inspection of Premises, Records, Equipment, Methods and Discharges
	G8. Duty to Provide Information
	G9. General Maintenance and Repair Duties
	G10. Recordkeeping Requirements for Compliance Monitoring
	G11. Evidence Used in Establishing That a Violation Has or Is Occurring
	G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification
	G13. Hazardous Release
	G14. Excess Emissions and Excess Emissions Reporting Requirements
	G15. Permit Deviation Reporting Requirements
	G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP
	Regulations
	G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V
	Permit Modification
	G18. Duty to Modify a Title V Permit
	G19. Duty to Obtain Construction Permits
	G20. Asbestos
	G21. Open Burning
	G22. Acid Rain (Title IV) Emissions Allowances
	G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements
	G24. Permit Reopenings
	G25. Permit Shield
	G26. Severability
	G27. Property Rights
	G28. Transferability
	G29. Disclaimer
	G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification
	G31. Prevention of Air Pollution Emergency Episodes
	G32. Contacts List
VI.	Appendix A: NESHAP

# **Abbreviations**

acfm	actual cubic feet per minute
	Code of Federal Regulation
	electric arc furnace
	emissions inventory questionnaire
	degrees Fahrenheit
	grains per dry standard cubic foot
	Iowa Administrative Code
	Iowa Department of Natural Resources
	induction furnace
	pounds per hour
lb/MMBtu	pounds per million British thermal units
LPG	liquefied petroleum gas
	motor vehicle air conditioner
NG	natural gas
NSPS	new source performance standard
	parts per million by volume
	standard cubic feet per minute
TPY	tons per year
	United States Environmental Protection Agency
<b>Pollutants</b>	
	particulate matter ten microns or less in diameter
	particulate matter
	Sulfur dioxide
	Nitrogen oxides
	volatile organic compound
	Carbon monoxide
HAP	hazardous air pollutant
	Dimethylethylamine

# I. Facility Description and Equipment List

Facility Name: John Deere Foundry Waterloo

Permit Number: 02-TV-012R3

Facility Description: This facility is a gray iron foundry that manufactures agricultural equipment

components. (SIC 3321)

# **Equipment List**

#### A. Melt

Emission Point Emission Unit Number Number		Emission Unit Description	IDNR Construction Permit Number
3000*	P-120B	D830 Iron Inoculation	N/A
3002-3004*	r-120D	D830 Holl illoculation	N/A
3008*	P-120C	D830 Molten Metal	N/A
3010-3011*	P-120C	Transfer	N/A
3015-3021*	P-120F	D830 Slag Loadout	N/A
ALLOYBH	P-120B-IF	Alloy Addition System	99-A-349
IFBH	P-003-IF	Induction Melt Furnace #3	98-A-957-S5
ІГВП	P-004-IF	Induction Melt Furnace #4	98-A-937-83
IEDIIO	P-001-IF	Induction Melt Furnace #1	11 4 752 61
IFBH2	P-002-IF	Induction Melt Furnace #2	11-A-753-S1
IFDPBH	P-004-IF	Dust Pelletizer Process for Melt	98-A-958-S1

<sup>\*</sup> These are roof vents that are located above the emission unit(s) that are sources of fugitive emissions, not emission unit specific stacks or points.

### B. Mold Line 802

Emission Point Number	Emission Unit Number Emission Unit Description		IDNR Construction Permit Number
249	Belt 607 – 802 Dust Pelletizer Bin Vent Filter	802 Cast Line Shakeout/Sand Preparation	97-A-138-S6
3235-3237*		_	
3240-3243*	P-132A	802 Pouring and Cooling	N/A
3330-3332*			
802MT	802MT	802 Magnesium Treatment	17-A-312-S1

<sup>\*</sup> These are roof vents that are located above the emission unit(s) that are sources of fugitive emissions, not emission unit specific stacks or points.

# C. Mold Line 804

Emission Point Number	Emission Unit Number	Emission Unit Description	IDNR Construction Permit Number	
804CS9	804CS	804 Cooling Shed	16-A-126-P2	
804CS10	804CS		16-A-127-P2	
804MT1	804MT1	804 Magnesium Treatment	11-A-606-S3	
	804LB1-804LB2			
	804PO			
	804POUR			
	804SC1-804SC2			
804SS1	804SO1-804SO2		11-A-437-P4	
	804MIX1-804MIX3			
	804CY1-804CY2			
	804TOR			
	804DB1-804DB2	_		
	804LB1-804LB2	804 Sand System		
	804PO			
	804POUR			
	804SC1-804SC2			
804SS2	804SO1-804SO2		11-A-438-P4	
	804MIX1-804MIX3			
	804CY1-804CY2			
	804TOR			
	804DB1-804DB2			
904M	804M	804 Attrition Mill	17 A 719 C2	
804M	804SP	804 Shaker Pan	17-A-718-S2	

# D. Sand

Emission Point Number	Emission Unit Number	Emission Unit Description	IDNR Construction Permit Number	
ESP	P-174	East Sand Pelletizer Dust Silo	78-A-022-S1	
IIBH2	808Sb	Assorted Belts	77-A-121-S11	
ПБП2	804SH	804 Sand Hopper	//-A-121-311	
SDSABH	SDSABH P-162 New Sand Silo Storage and Delivery to Process		72-A-040-S3	
248	808RS	West Dock Waste Sand Loadout	97-A-139-S4	
240	808SS	West Dock New Sand Unloading Station	97-A-139-34	

# E. Core

Emission Point Number	Emission Unit Number	Emission Unit Description	IDNR Construction Permit Number
069	P-069	OSI Core Oven, Wash Dip Tank, and Spray Guns	01-A-946-S2
071	P-071	OSI Core Oven, Wash Dip Tank, and Spray Guns	01-A-948-S2
072	P-072	OSI Core Oven, Wash Dip Tank, and Spray Guns	01-A-949-S2
073	P-073	OSI Core Oven, Wash Dip Tank, and Spray Guns	12-A-501-P2
074	P-074	OSI Core Oven, Wash Dip Tank, and Spray Guns	12-A-502-P2
075	P-075	C 1 II 11 C 4	13-A-190-P3
076	P-076	Sand Handling System	13-A-191-P1
082	P-082	Phenolic Urethane Cold Box	95-A-002-P6
083	1 002	Core Making Line	13-A-192-P2

# F. Clean

Emission Point Number	Emission Unit Number	<b>Emission Unit Description</b>	IDNR Construction Permit Number
IIBH1E	8555TB	855 Tumblast (Machines 5 & 6)	77-A-120-S9
	804BC1 804BC2	804 Blast Cabinets 1-2	
804CR	804SBB1 804SBB2 804SBB3 804SBB4	804 Spot Blast Booths 1-4	11-A-597-S2
	P-009	D850 Primary Blast Cabinet	
CLRBH-4	P-010	D850 Reblast and Core Knockout Cabinet	09-A-325-S2
	P-011A	D850 Spotblast	
	P-017	D853 Primary Blast Cabinet	

# G. Jobbing Floor

Emission Point Number	Emission Unit Number	Emission Unit Description	IDNR Construction Permit Number	
091	P-091	Mold Line-Phenolic Urethane No-	95-A-005-P4	
071	1-071	Bake Core Making (Jobbing Floor)	75-11-005-14	
301	P-301	Jobbing Floor Pouring and Cooling	N/A	
IIBH3	JFSO and JFSS	Jobbing Floor Shakeout Pan and	77-A-122-S10	
IIBH4W		Jobbing Floor Sand Separator	77-A-123-S10	

# **Insignificant Activities Equipment List**

Insignificant Emission Unit Number	Insignificant Emission Unit Description
SUE 1	808Core Room Didion Drum
SUE 2	Refractory Reline Area
SUE 3	Bond Storage Silo
SUE 4	Jobbing Floor Baghouse for Sand Handling
SUE 5	CB50 Additive System
SUE 7	850 CKO Shot Classifier
SUE 8	Line 802 Casting Cooling
SUE 9	Sweeper Dump
SUE 16	802 Pattern Spray Application
SUE 17	EXone S-Max 3D Sand Printer
SUE 19	East Sand Pelletizer Weigh Hoper and Mixer
SUE 20	Blow Off Booth
SUE 21	20 Ton Deck
SUE 22	Mortar Mixing #1
SUE 23	Mortar Mixing #2
SUE 24	804 West Additive Silo
SUE 25	804 Center Additive Silo
SUE 26	804 East Additive Silo
SUE 27	789 Bagsplitter
SUE 28	3D Plastic Desktop Printer
SUE 29	Personnel Dust Booth 1
SUE 30	Personnel Dust Booth 2
SUE 31	Personnel Dust Booth 3
SUE 32	LSAM Plastic 3D Printer
SUE 33	Casting Crusher
SUE 34	Tub Dumpers
SUE 35	802 Bentonite Marking
SUE 36	804 Mold Spray
T-1	10,000 Gallon Diesel Tank
T-2	500 Gallon Diesel Tank
T-3	300 Gallon Gasoline Tank
T-API Tank	API Oily Wastewater Tank
T-Filter	PH7 Filter Rinsate Tank
T-836 East	D836 Glycol Tank - East
T-836 West	D836 Glycol Tank - West
T-C1/C2	C1/C2 Glycol Tank Emissions
T-Mid Melt	D830 Main Glycol Storage Tank
T-C4	C4 Glycol Tank
T-C3	C3 Glycol Tank
T-Well	Wellwater Treatment Tank
T-Aline	Aline Contractor Diesel Fuel Tank

Insignificant Emission Unit Number	Insignificant Emission Unit Description	
T-Alpha	Alpha Contractor Diesel Fuel Tank	
T-MidValley	Mid-Valley Contractor Tank	
P-117	D737 No Bake Resin I Tank	
P-118	D737 No Bake Catalyst Tank	
P-119	D737 No Bake Resin II Tank	
P-163	D701 Cold Box Resin I Tank 1	
P-164	D701 Cold Box Resin I Tank 2	
P-166	D701 Cold Box Resin II Tank 1	
P-167	D701 Cold Box Resin II Tank 2	
P-173	East Sand Pelletizer Loadout	
P-182	Gas-Fired Heating Equipment	
P-185D	Ladle Preheat	
P-300	Scrap Receiving and Handling	
Fug 1	Fugitive Cleaning Room VOC Emissions	
Fug 2	Fugitive Inspection VOC Emissions	
Fug 3	Fugitive Pattern Shop VOC Emissions	
Fug 4	Ladle Knockout	
Fug 804	804 Fugitives	
Bake-Out	Contractor Torch	
FilterVac	804 Filter Robot Vacuum	
PatMntVac	804 Pattern Mount Vac	
830Shear	Scrap Shear	

# **II. Plant-Wide Conditions**

Facility Name: John Deere Foundry Waterloo

Permit Number: 02-TV-012R3

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

#### **Permit Duration**

The term of this permit is: Five (5) years

Commencing on: 03/24/2023

Ending on: 03/23/2028

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

#### **Emission Limits**

Unless specified otherwise in the Emission Point-Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:

Opacity (visible emissions): 40% opacity<sup>(1)</sup>
Authority for Requirement: 567 IAC 23.3(2)"d"

(1) Except as provided in 567 IAC 23.3(2)"d"(1)-(6)

<u>Sulfur Dioxide (SO<sub>2</sub>):</u> 500 parts per million by volume Authority for Requirement: 567 IAC 23.3(3)"e"

# Particulate Matter:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed on or after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24. For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).

Authority for Requirement: 567 IAC 23.3(2)"a"

<u>Fugitive Dust:</u> Attainment and Unclassified Areas - A person shall take reasonable precautions to prevent particulate matter from becoming airborne in quantities sufficient to cause a nuisance as defined in Iowa Code section 657.1 when the person allows, causes or permits any materials to be handled, transported or stored or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, with the exception of farming operations or dust

generated by ordinary travel on unpaved roads. Ordinary travel includes routine traffic and road maintenance activities such as scarifying, compacting, transporting road maintenance surfacing material, and scraping of the unpaved public road surface. (the preceding sentence is State Only) All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The public highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not be limited to, the following procedures.

- 1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
- 2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
- 3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizer or limestone.
- 4. Covering, at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
- 5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.
- 6. Reducing the speed of vehicles traveling over on-property surfaces as necessary to minimize the generation of airborne dusts.

Authority for Requirement: 567 IAC 23.3(2)"c"

#### **NSPS and NESHAP Applicability**

The emissions units of John Deere Foundry Waterloo are not subject to a NSPS subpart at this time.

The operations at this facility are subject to the requirements of 40 CFR, Part 63, Subpart A – General Provisions and 40 CFR, Part 63, Subpart EEEEE – National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries.

Authority for Requirement: 40 CFR Part 63 Subpart EEEEE 567 IAC 23.1(4)"de"

# **III. Emission Point-Specific Conditions**

Facility Name: John Deere Foundry Waterloo

Permit Number: 02-TV-012R3

# **Melt**

Emission Point ID Number: 3000, 3002-3004, 3008, 3010-3011, 3015-3021

# **Emission Unit Description**

**Table: 3000 Series Fans** 

Emission Point Number	Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity (tons/hr)
3000 3002-3004 3008 3010-3011 3015-3021	P-120B	D830 Iron Inoculation		72
	P-120C	D830 Molten Metal Transfer	Metal	72
	P-120F	D830 Slag Loadout		40

# **Applicable Requirements**

# Emission Limits For Internally Vented Sources (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table Internally Vented & Fugitives shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM) Emission Limits: 0.1gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

# Emission Limits For Fugitive Sources (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table Internally Vented & Fugitives shall not exceed the levels specified below.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Monitoring Requirements	
The owner/operator of this equipment shall comply with the monitoring	g requirements listed below
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🔀

Authority for Requirement: 567 IAC 22.108(3)

# **Emission Point ID Number: EP AlloyBH**

# Associated Equipment

Associated Emission Unit ID Numbers: P-120B-IF Emissions Control Equipment ID Number: CE AlloyBH

Emissions Control Equipment Description: Alloy Addition System Baghouse

Emission Unit vented through this Emission Point: P-120B-IF

Emission Unit Description: Alloy Adding System

Raw Material/Fuel: Alloy

Rated Capacity: 93.5 tons per hour

# **Applicable Requirements**

# Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 99-A-349

(1) If visible emissions are observed other than startup, shutdown, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Pollutant: PM<sub>10</sub>

Emission Limit: 0.64 lb/hr

Authority for Requirement: DNR Construction Permit 99-A-349

Pollutant: Particulate Matter

Emission Limit: 0.1 gr/scf, 0.64 lb/hr

Authority for Requirement: 567 IAC 23.3(2)"a"

DNR Construction Permit 99-A-349

# **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height (feet from ground): 66 Stack Opening, (inches, dia.): 22 Exhaust Flow Rate (acfm): 10,000 Exhaust Temperature (°F): 90

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 99-A-349

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🛛 No 🗌

Authority for Requirement: 567 IAC 22.108(3)

# **CAM Plan for CE AlloyBH Baghouse**

See Section IV Compliance Assurance Monitoring (CAM)

### **Emission Point ID Number: EP IFBH**

# **Associated Equipment**

Associated Emission Unit ID Number: P-003-IF, P-004-IFEmissions Control Equipment ID

Number: CE IFBH

Emissions Control Equipment Description: Induction Furnace Baghouse

Emission Unit vented through this Emission Point: P-003-IF, P-004-IF

Emission Unit Description: Induction Furnaces #3 and #4

Raw Material/Fuel: Metal Rated Capacity: 49.5 tons/hr

# **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit: 40%<sup>(1)</sup>, 20% <sup>(1)</sup>

Authority for Requirement: 567 IAC 23.3(2)"d"

567 IAC 23.1(4) "de"

DNR Construction Permit 98-A-957-S5

- (1) Opacity limits are:
  - a. Per 567 IAC 23.3(2)"d" the limit on the stack is 40%. In addition, an exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
  - b. Per 40 CFR §63.7690(a)(7), fugitive emissions shall not be discharged to the atmosphere from the foundry operations that exhibit opacity greater than 20% on a six (6) minute average except for one (1) six (6) minute average per hour that does not exceed 27%.

Pollutant: PM<sub>10</sub>

Emission Limit: 5.95 lb/hr<sup>(2)</sup>

Authority for Requirement: DNR Construction Permit 98-A-957-S5

Pollutant: Particulate Matter

Emission Limit:  $5.95 \text{ lb/hr}^{(2)}$ ,  $0.005 \text{gr/dscf}^{(4)}$ 

Authority for Requirement: 567 IAC 23.1(4) "de"

DNR Construction Permit 98-A-957-S5

(2) The emission limit for EU P-004-IF is 1.11 lbs/hr for both PM and PM<sub>10</sub>

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit: 18.5 lb/hr<sup>(3)</sup>

Authority for Requirement: DNR Construction Permit 98-A-957-S5

(3) The emission limit for EU P-004-IF is 4.0 lbs/hr for VOC.

Pollutant: Lead (Pb)

Emission Limit: 0.065 lb/hr

Authority for Requirement: DNR Construction Permit 98-A-957-S5

Pollutant: Total Metal (HAP)<sup>(4)</sup> Emission Limit: 0.0004 gr/dscf

Authority for Requirement: 567 IAC 23.1(4) "de"

DNR Construction Permit 98-A-957-S5

- (4) Per 40 CFR §63.7690(a)(1), emissions discharged to the atmosphere shall not exceed either:
  - a. 0.005 grains of PM per dry standard cubic foot (gr/dscf) or
  - b. 0.0004 gr/dscf of total metal hazardous air pollutant (HAP).

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Operating limits for these emission units shall be:

- 1. Per 40 CFR §63.7700, the owner or operator shall meet all applicable work practice standards.
- 2. Per 40 CFR §63.7710, the owner or operator shall meet all applicable operation & maintenance requirements.
- 3. Per 40 CFR §63.7720(c), the owner or operator shall develop a written startup, shutdown, and malfunction (SSM) plan according to the provisions in 40 CFR §63.6(e)(3).
- 4. The owner or operator shall do all monitoring required by NESHAP Subpart EEEEE (See 40 CFR §63.7740 40 CFR §63.7747.
- 5. Per 567 IAC 33.3(18)"f"(1), prior to beginning actual construction of the project (Project Number 08-068) the owner or operator shall document:
  - a. A description of the project (Project Number 08-068),
  - b. Identification of the emission unit(s) whose emissions of a regulated NSR pollutant could be affected by the project (Project Number 08-068), and
  - c. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions (BAE), the projected actual emissions (PAE), the amount of emissions excluded under paragraph "3" of the definition of "projected actual emissions" in subrule 33.3(1), an explanation describing why such amount was excluded, and any netting analysis if applicable.
- 6. Per 567 IAC 33.3(18)"f"(4), the owner or operator shall:
  - a. Monitor the emission of any regulated NSR pollutant that could increase as a result of the project that is emitted by any emissions unit identified in Condition 14.E.(2).
  - b. Calculate the annual emissions, in tons per year on a calendar-year basis, for a period of five (5) years following resumption of regular operations and maintain a record of regular operations after the change.
- 7. Per 567 IAC 33.3(18)"g", the owner or operator shall make the information required to be documented and maintained pursuant to 567 IAC 33.3(18)"f" available for review upon request for inspection by the Department or the general public pursuant to the requirements for Title V operating permits contained in 567 IAC 22.107(6).

# Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. These records shall show the following:

1. The owner or operator shall keep all applicable records as required per 40 CFR §63.7752. Per 40 CFR §63.7752, these records shall be kept for five (5) years. The records shall be kept onsite for at least two (2) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record per 40 CFR §63.10(b)(1). The owner or operator may keep the records for the previous three (3) offsite.

Authority for Requirement: DNR Construction Permit 98-A-957-S5

### **NSPS/NESHAP Applicability**

This emission point is subject to 40 CFR 63 Subpart EEEEE National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries.

Authority for Requirement: DNR Construction Permit 98-A-957-S5

567 IAC 23.1(4)"de"

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height (feet from ground): 80 Stack Opening, (inches, dia.): 100

Exhaust Flow Rate (scfm): 100,000 to 200,000 (i.e., 1 or 2 fans)

Exhaust Temperature (°F): 150

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 98-A-957-S5

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

# **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

### **Stack Testing:**

Pollutant: Particulate Matter (1)

Stack Test to be Completed by -Every 5 years

Test Method - 40 CFR 60, Appendix A, Method 5

Authority for Requirement - DNR Construction Permit 98-A-957-S5

Pollutant: Metal HAP (1)

Stack Test to be Completed by –Every 5 years

Test Method - 40 CFR 60, Appendix A, Method 5

Authority for Requirement - DNR Construction Permit 98-A-957-S5

Pollutant – Opacity<sup>(2)</sup>

Stack Test to be Completed – Every 6 months

Test Method - 40 CFR 60, Appendix A, Method 9

Authority for Requirement: 567 IAC 23.1(4)"de"

- (1) Testing shall be conducted per 40 CFR §63.7734 to demonstrate compliance with either the PM limit or the Total Metal HAP limit in Condition 10 of the construction permit.
- Plant-wide, as specified in 40 CFR Part 63, Subpart EEEEE, §63.7731, the permittee must conduct subsequent performance tests to demonstrate compliance with the opacity limit in §63.7690(a)(7) no less frequently than once every 6 months.

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🛛 No 🗌
Authority for Requirement: 567 IAC 22.108(3)	

#### **CAM Plan for CE IFBH Baghouse**

See Section IV Compliance Assurance Monitoring (CAM)

ZLP 18 02-TV-012R3, 03/24/23

# **Emission Point ID Number: EP IFBH2**

# Associated Equipment

Associated Emission Unit ID Number: P-001-IF, P-002-IF Emissions Control Equipment ID Number: CE IFBH2

Emissions Control Equipment Description: Induction Furnace Baghouse

Emission Unit vented through this Emission Point: P-001-IF, P-002-IF

Emission Unit Description: Induction Furnaces #1 and #2

Raw Material/Fuel: Metal Rated Capacity: 44 tons/hr

# **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit: 40%<sup>(1)</sup>, 20% <sup>(1)</sup>

Authority for Requirement: 567 IAC 23.3(2)"d"

567 IAC 23.1(4) "de"

DNR Construction Permit 11-A-753-S1

- (1) Opacity limits are:
  - Per 567 IAC 23.3(2)"d" the limit on the stack is 40%. In addition, an exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
  - Per 40 CFR §63.7690(a)(7), fugitive emissions shall not be discharged to the atmosphere from the foundry operations that exhibit opacity greater than 20% on a six (6) minute average except for one (1) six (6) minute average per hour that does not exceed 27%.

Pollutant: PM<sub>10</sub>

Emission Limit: 5.95 lb/hr

Authority for Requirement: DNR Construction Permit 11-A-753-S1

Pollutant: Particulate Matter

Emission Limit: 5.95 lb/hr, 0.005gr/dscf<sup>(2)</sup>

Authority for Requirement: 567 IAC 23.1(4) "de"

DNR Construction Permit 11-A-753-S1

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit: 18.5 lb/hr

Authority for Requirement: DNR Construction Permit 11-A-753-S1

Pollutant: Lead (Pb)

Emission Limit: 0.065 lb/hr

Authority for Requirement: DNR Construction Permit 11-A-753-S1

Pollutant: Total Metal (HAP)<sup>(2)</sup> Emission Limit: 0.0004 gr/dscf

Authority for Requirement: 567 IAC 23.1(4) "de"

DNR Construction Permit 11-A-753-S1

- (2) Per 40 CFR §63.7690(a)(1), emissions discharged to the atmosphere shall not exceed either:
  - 0.005 grains of PM per dry standard cubic foot (gr/dscf) or
  - 0.0004 gr/dscf of total metal hazardous air pollutant (HAP).

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Operating limits for these emission units shall be:

- 1. Per 40 CFR §63.7700, the owner or operator shall meet all applicable work practice standards.
- 2. Per 40 CFR §63.7710, the owner or operator shall meet all applicable operation & maintenance requirements.
- 3. Per 40 CFR §63.7720(c), the owner or operator shall develop a written startup, shutdown, and malfunction (SSM) plan according to the provisions in 40 CFR §63.6(e)(3).
- 4. The owner or operator shall do all monitoring required by NESHAP Subpart EEEEE (See 40 CFR §63.7740 40 CFR §63.7747.

# Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. These records shall show the following:

1. The owner or operator shall keep all applicable records as required per 40 CFR §63.7752. Per 40 CFR §63.7752, these records shall be kept for five (5) years. The records shall be kept onsite for at least two (2) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record per 40 CFR §63.10(b)(1). The owner or operator may keep the records for the previous three (3) offsite.

Authority for Requirement: DNR Construction Permit 11-A-753-S1

### **NSPS/NESHAP Applicability**

This emission point is subject to 40 CFR 63 Subpart EEEEE National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries.

Authority for Requirement: DNR Construction Permit 11-A-753-S1

567 IAC 23.1(4) "de"

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height (feet from ground): 80 Stack Opening, (inches, dia.): 100

Exhaust Flow Rate (acfm): 100,000 to 200,000 (i.e., 1 or 2 fans)

Exhaust Temperature (°F): 150

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 11-A-753-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

# **Stack Testing:**

Pollutant: Particulate Matter (1)

Stack Test to be Completed by – Every 5 years Test Method - 40 CFR 60, Appendix A, Method 5 Authority for Requirement: 567 IAC 23.1(4)"de"

DNR Construction Permit 11-A-753-S1

Pollutant: Metal HAP (1)

Stack Test to be Completed by – Every 5 years Test Method - 40 CFR 60, Appendix A, Method 5 Authority for Requirement: 567 IAC 23.1(4)"de"

DNR Construction Permit 11-A-753-S1

Pollutant – Opacity (2)

Stack Test to be Completed – Every 6 months Test Method - 40 CFR 60, Appendix A, Method 9 Authority for Requirement: 567 IAC 23.1(4)"de"

- (1) Testing shall be conducted per 40 CFR §63.7734 to demonstrate compliance with either the PM limit or the Total Metal HAP limit. in Condition 10 of the construction permit.
- Plant-wide, as specified in 40 CFR Part 63, Subpart EEEEE, §63.7731, the permittee must conduct subsequent performance tests to demonstrate compliance with the opacity limit in §63.7690(a)(7) no less frequently than once every 6 months.

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required?	Yes No No
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🖂 No 🗌

Authority for Requirement: 567 IAC 22.108(3)

# **CAM Plan for CE IFBH2 Baghouse**

See Section IV Compliance Assurance Monitoring (CAM)

# **Emission Point ID Number: IFDPBH**

# Associated Equipment

Associated Emission Unit ID Number: P-004-IFEmissions Control Equipment ID Number: CE

**IFDPBH** 

Emissions Control Equipment Description: Induction Furnace Dust Pelletizer Baghouse

Emission Unit vented through this Emission Point: P-004-IF

Emission Unit Description: IF Dust Pelletizer

Raw Material/Fuel: IF Dust Rated Capacity: 6.0 tons per hour

# **Applicable Requirements**

# Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 98-A-958-S1

(1) If visible emissions are observed the owner/operator is required to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM<sub>10</sub>

Emission Limit: 0.18 lb/hr

Authority for Requirement: DNR Construction Permit 98-A-958-S1

Pollutant: Particulate Matter Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

DNR Construction Permit 98-A-958-S1

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

# Hours of operation:

1. This silo is limited to operating a maximum of eight (8) hours per day.

### Reporting & Record keeping:

Records shall be maintained on site for five (5) years and be available for inspection upon request by representatives of the Department of Natural Resources. These records shall show the following:

1. Record the number of hours per day this silo is operated.

Authority for Requirement: DNR Construction Permit 98-A-958-S1

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height (feet from ground): 86 Stack Opening, (inches, dia.): 16 Exhaust Flow Rate (scfm): 3,655 Exhaust Temperature (°F): 120

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 98-A-958-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes No No
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

# **802 Mold Line**

**Emission Point ID Number: EP 249** 

# Associated Equipment

Associated Emission Unit ID Numbers: See table below Emissions Control Equipment ID Number: CE 802BH Emissions Control Equipment Description: 802 Baghouse

	D 16 ( 11/D 1	
Emission Unit	Raw Material/Fuel	Maximum Capacity
Belt 607 (EU P031-a) and 802 PK Push Off Pan	Sand	300 tons sand/hr
Belt 603 (EU P031-b)	Sand	300 tons sand/hr
Pan 1A (EU P031-c)	Sand	300 tons sand/hr
Belt 614 (EU P031-d)	Sand	300 tons sand/hr
Pan 3A (EU P031-e)	Sand	300 tons sand/hr
Pushoff Conveyor (EU P031-g)	Sand	300 tons sand/hr
Vibrating Lump Breaker (EU P031-h)	Sand	300 tons sand/hr
Shake Out Enclosure (P034-b)	Sand	300 tons sand/hr
Muller (EU P034-c)	Sand	300 tons sand/hr
Belt Transfer Hartley Discharge (EU P034-d)	Sand	300 tons sand/hr
Chute Ventilation for Refuse Sand (EU P034-e)	Sand	300 tons sand/hr
614 Plow Belt Ventilation (EU P034-f)	Sand	300 tons sand/hr
Belt 609 Head Pulley (EU P034-g)	Sand	300 tons sand/hr
Belt 607 Tail Pulley (EU P034-h)	Sand	300 tons sand/hr
Belt 601 (EU P034-i)	Sand	300 tons sand/hr
Belt 603 (EU P034-j)	Sand	300 tons sand/hr
Belt 3032/603 (EU P034-1)	Sand	300 tons sand/hr
Belt 611/603 (EU P034-m)	Sand	300 tons sand/hr
Belt 608/609 (EU P034-o)	Sand	300 tons sand/hr
Scalping Unit	Sand	300 tons sand/hr
620 Tail Pulley	Sand	300 tons sand/hr
Gating Discharge	Sand/Metal	150 tons sand and iron/hr
802 Attrition Mill (EU 802M)	Sand/Metal	150 tons sand and iron/hr
Bond Bin Enclosure	Sand	300 tons sand/hr
PK Enclosure	Sand	300 tons sand/hr
Pan 2	Sand	300 tons sand/hr
Pan 3	Sand	300 tons sand/hr
Pan 4 and Tub Dumper	Sand	300 tons sand/hr
Sleeve Setter Station	Sand	300 tons sand/hr
Sand Cooler	Sand	300 tons sand/hr
802 Dust Pelletizer Bin Vent Filter	Sand	300 tons sand/hr

<u>Note</u>: At the time of the Title V permit issuance, construction has not yet been completed on the physical changes described in DNR Construction Permit 97-A-138-S6. The facility is still considered in compliance with Construction Permit Condition 10A. Construction must be completed by 04/30/2024.

# **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 97-A-138-S6

(1) If visible emissions are observed other than at startup, shutdown, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Pollutant: PM<sub>10</sub>

Emission Limit: 14.0 lb/hr; 2.52 lb/hr (2)

Authority for Requirement: DNR Construction Permit 97-A-138-S6

Pollutant: Particulate Matter

Emission Limit: 0.05 gr/scf; 2.52 lb/hr<sup>(2)</sup>

Authority for Requirement: 567 IAC 23.3(2)"a"

DNR Construction Permit 97-A-138-S6

(2) For PM and PM<sub>10</sub> emissions from the Vibrating Lump Breaker (EU P031-h) after the control device.

# Operational Requirements with Associated Monitoring and Recordkeeping

The owner/operator of this equipment shall comply with the operational limits and requirements

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- 1. The owner or operator shall install and continuously operate a bag leak detection system according to the following requirements:
  - a. The bag leak detection system sensor must provide output of relative particulate matter loadings and the owner or operator shall continuously record the output from the bag leak detection system using electronic or other means
  - b. The system must be equipped with an alarm that will be triggered when an increase in relative particulate loadings is detected over the alarm notification set point established in the site-specific monitoring plan, with the alarm notification sent to the appropriate plant personnel.
  - c. Initial adjustment of the system to establish a baseline output shall be determined within an initial setup period that is sufficient to capture fluctuations in the normal baseline as well as capturing cleaning signal spikes. A dye leak test (ultraviolet or

- equivalent) shall be used prior to and following the conclusion of the setup period to demonstrate no control system leakage during the monitoring system setup period.
- d. Following the initial setup, the owner or operator shall not adjust the sensitivity, range, averaging period, alarm set point, or alarm delay time without following the procedures outlined in Construction Permit Condition c above.
- 2. The owner or operator shall develop a site-specific bag leak detection system monitoring plan, including operation and maintenance procedures, consistent with the recommendations contained in the U.S. Environmental Protection Agency guidance document "Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015) and comparable bag leak detection industry quality control standards. The owner or operator shall operate and maintain the bag leak detection system according to the site-specific monitoring plan at all times.
- 3. The owner or operator shall develop an operating and maintenance plan for the baghouse. The plan shall include a preventative maintenance schedule for routine and long-term maintenance consistent with good air pollution control practice and comparable baghouse industry quality control standards. The owner or operator shall operate and maintain the baghouse according to the plan at all times.
- 4. The owner or operator shall develop a corrective action plan for the baghouse. The plan must include the requirement that, in the event a bag leak detection system alarm notification is triggered, the facility shall determine the cause of the alarm notification, initiate corrective action to correct the cause of the alarm notification, and complete corrective action(s) as prescribed in the plan.
- 5. The owner or operator shall maintain a record of all bag leak detection alarm notifications, baghouse inspections and maintenance, and any actions resulting from bag leak detection alarm notification occurrences, inspections, and maintenance of the baghouse.
- 6. The owner or operator shall send the initial site-specific monitoring plan for the bag leak detection system, and any updates to the inspection or quality control standard section within the plan, to the Department for review.
- 7. The owner or operator shall calculate the annual emissions of PM, PM<sub>10</sub>, and PM<sub>2.5</sub> in tons per year on a calendar basis, for a period of five years following resumption of regular operations and maintain a record of regular operations after the change, as required in IAC 567-33.3(18)"f"(4). This information shall be retained by the owner or operator for a period of ten years after project 17-199 is completed. This record of regular operations after the change shall be a documentation of emissions from all emission units named in project 17-199 as part of the Phase 1 and Phase 2 projects for complying with the new OSHA requirements for silica exposure. "Resumption of regular operations" shall be defined for project 17-199 as having completed all allowed construction associated with the Phase 1 and Phase 2 projects for complying with the new OSHA requirements for silica exposure.
- 8. The owner or operator shall submit a report to the Department if the annual emissions, in tons per year, from the units named in projects 17-199 and 17-409 as part of the Phase 1 and Phase 2 projects for complying with the new OSHA requirements for silica exposure, exceed the baseline actual emissions by an amount that is "significant" as defined in IAC 567-33.3(1) for that pollutant. Note that the units named include contemporaneous increases and units permitted under IAC 567-22.1(2)"w". The baseline actual emissions are set at 46.55 tons for PM and PM<sub>10</sub> and 46.50 tons for PM<sub>2.5</sub>.

Authority for Requirement: DNR Construction Permit 97-A-138-S6

### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height (feet from ground): 110 Stack Opening, (inches, dia.): 132 Exhaust Flow Rate (acfm): 375,000 Exhaust Temperature (°F): 110

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 97-A-138-S6

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

# **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes No No
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🔀
Compliance Assurance Monitoring (CAM) Plan Required?	Yes No

Authority for Requirement: 567 IAC 22.108(3)

#### CAM Plan for CE 802BHBaghouse

See Section IV Compliance Assurance Monitoring (CAM)

# Emission Point ID Number: EP 3235-3237, 3240-3243, 3330-3332

Associated Equipment

Associated Emission Unit ID Numbers: EU P-132A

# **Emission Unit Description**

**Table: 3200 Series Fans** 

Emission Point	Emission Unit	Emission Unit	Raw	Rated Capacity
Number	Number	Description	Material	(tons/hr)
3235-3237 3240-3243 3330-3332	P-132A	802 Pouring and Cooling	Metal	45

# **Applicable Requirements**

# Emission Limits For Internally Vented Sources (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table Internally Vented & Fugitives shall not exceed the levels specified below.

Pollutant: Opacity Emission Limits: 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter (PM)

Emission Limits: 0.1gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

## Emission Limits For Fugitive Sources (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point identified in Table Internally Vented & Fugitives shall not exceed the levels specified below.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

<u>Monitoring Requirements</u> The owner/operator of this equipment shall comply with the monitoring	g requirements listed below
Agency Approved Operation & Maintenance Plan Required?	Yes No No
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

# **Emission Point ID Number: 802MT**

#### Associated Equipment

Associated Emission Unit ID Number: 802MT Emissions Control Equipment ID Number: CE 133

Emissions Control Equipment Description: Baghouse & MERV 14 Filters

Emission Unit vented through this Emission Point: 802MT

Emission Unit Description: 802 Magnesium Treatment

Raw Material/Fuel: Steel Rated Capacity: 45 tons iron/hr

<u>Note</u>: At the time of the Title V permit issuance, construction has not yet been completed on the physical changes described in DNR Construction Permit 17-A-312-S1. The facility is still considered in compliance with Construction Permit Condition 10A. Construction must be completed by 04/30/2024.

# **Applicable Requirements**

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 17-A-312-S1

Pollutant: Particulate Matter PM<sub>10</sub> Emission Limit(s): 1.69 lbs/hr

Authority for Requirement: DNR Construction Permit 17-A-312-S1

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

DNR Construction Permit 17-A-312-S1

<sup>(1)</sup> Visible emissions will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

# Operational Requirements and Associated Monitoring and Recordkeeping

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- 1. The owner or operator shall install and continuously operate a bag leak detection system according to the following requirements:
  - a. The bag leak detection system sensor must provide output of relative particulate matter loadings and the owner or operator shall continuously record the output from the bag leak detection system using electronic or other means
  - b. The system must be equipped with an alarm that will be triggered when an increase in relative particulate loadings is detected over the alarm notification set point established in the site-specific monitoring plan, with the alarm notification sent to the appropriate plant personnel.
  - c. Initial adjustment of the system to establish a baseline output shall be determined within an initial setup period that is sufficient to capture fluctuations in the normal baseline as well as capturing cleaning signal spikes. A dye leak test (ultraviolet or equivalent) shall be used prior to and following the conclusion of the setup period to demonstrate no control system leakage during the monitoring system setup period.
  - d. Following the initial setup, the owner or operator shall not adjust the sensitivity, range, averaging period, alarm set point, or alarm delay time without following the procedures outlined in Construction Permit Condition c above.
- 2. The owner or operator shall develop a site-specific bag leak detection system monitoring plan, including operation and maintenance procedures, consistent with the recommendations contained in the U.S. Environmental Protection Agency guidance document "Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015) and comparable bag leak detection industry quality control standards. The owner or operator shall operate and maintain the bag leak detection system according to the site-specific monitoring plan at all times.
- 3. The owner or operator shall develop an operating and maintenance plan for the baghouse. The plan shall include a preventative maintenance schedule for routine and long-term maintenance consistent with good air pollution control practice and comparable baghouse industry quality control standards. The owner or operator shall operate and maintain the baghouse according to the plan at all times.
- 4. The owner or operator shall develop an operating and maintenance plan for the baghouse and bag leak detection system. The plan shall include a preventative maintenance schedule for routine and long-term maintenance consistent with good air pollution control practice and comparable baghouse and bag leak detection industry quality control standards. The owner or operator shall operate and maintain the baghouse and bag leak detection system according to the site-specific monitoring plan at all times.
- 5. The owner or operator shall develop a corrective action plan for the baghouse. The plan must include the requirement that, in the event a bag leak detection system alarm notification is triggered, the facility shall determine the cause of the alarm notification, initiate corrective action to correct the cause of the alarm notification, and complete corrective action(s) as prescribed in the plan.

ZLP 32 02-TV-012R3, 03/24/23

- 6. The owner or operator shall maintain a record of all bag leak detection alarm notifications, baghouse inspections and maintenance, and any actions resulting from bag leak detection alarm notification occurrences, inspections, and maintenance of the baghouse.
- 7. The owner or operator shall send the initial site-specific monitoring plan for the bag leak detection system, and any updates to the inspection or quality control standard section within the plan, to the Department for review.
- 8. The owner or operator shall calculate the annual emissions of PM, PM<sub>10</sub>, and PM<sub>2.5</sub> in tons per year on a calendar basis, for a period of five years following resumption of regular operations and maintain a record of regular operations after the change, as required in IAC 567-33.3(18)"f"(4). This information shall be retained by the owner or operator for a period of ten years after project 17-199 is completed. This record of regular operations after the change shall be a documentation of emissions from all emission units named in project 17-199 as part of the Phase 1 and Phase 2 projects for complying with the new OSHA requirements for silica exposure. "Resumption of regular operations" shall be defined for project 17-199 as having completed all allowed construction associated with the Phase 1 and Phase 2 projects for complying with the new OSHA requirements for silica exposure.
- 9. The owner or operator shall submit a report to the Department if the annual emissions, in tons per year, from the units named in project 17-199 as part of the Phase 1 and Phase 2 projects for complying with the new OSHA requirements for silica exposure, exceed the baseline actual emissions by an amount that is "significant" as defined in IAC 567-33.3(1) for that pollutant. The baseline actual emissions are set at 46.55 tons for PM and PM<sub>10</sub> and 46.50 tons for PM<sub>2.5</sub>.

Authority for Requirement: DNR Construction Permit 17-A-312-S1

### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): Internally vented Stack Opening, (inches, dia.): Internally vented

Exhaust Flow Rate (scfm): 63,000

Exhaust Temperature (°F): Internally vented

Discharge Style: Internally vented

Authority for Requirement: DNR Construction Permit 17-A-312-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that either the temperature or flowrate above are different than the values stated, the owner or operator shall submit a request to the Department within thirty (30) days of the discovery to determine if a permit amendment is required or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🔀
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🗵

Authority for Requirement: 567 IAC 22.108(3)

# 804 Mold Line

**Emission Point ID Number: EP 804CS9-804CS10** 

Associated Equipment

Associated Emission Unit ID Number: 804CS

# **Emission Unit Description**

**Table: D804 Cooling Shed** 

Table: Doo4 Cooling Siled					
Emission Point Number	Emission Unit Number	Emission Unit Description	Raw Material	Allowed Capacity (tons/hr)	Construction Permit #
804CS9	90400	004 Caalina Chad	Mata1	42.0	16-A-126-P2
804CS10	804CS	804 Cooling Shed	Metal	43.8	16-A-127-P2

# **Applicable Requirements**

### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

#### **BACT Emission Limits:**

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit: 3.4 lb/ton

Authority for Requirement: DNR Construction Permit See Table: D804 Cooling Shed

Pollutant: Carbon Monoxide (CO)

Emission Limit: 8.3 lb/ton

Authority for Requirement: DNR Construction Permit See Table: D804 Cooling Shed

#### Other Emission Limits:

Pollutant: Opacity Emission Limit: 40%<sup>(1)</sup>

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit See Table: D804 Cooling Shed

An exceedance of the indicator opacity of 15% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM<sub>10</sub>

Emission Limit: 25 lb/hr

Authority for Requirement: DNR Construction Permit See Table: D804 Cooling Shed

Pollutant: Particulate Matter Emission Limit: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

DNR Construction Permit See Table: D804 Cooling Shed

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit: 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

DNR Construction Permit See Table: D804 Cooling Shed

Pollutant: Carbon Monoxide (CO) Emission Limit: 540.0 lb/hr<sup>(2)</sup>

Authority for Requirement: DNR Construction Permit See Table: D804 Cooling Shed

Hourly combined emission rate for EP 804SS1, EP 804SS2, EP 804CS9 and EP 804CS10 utilized in project 18-179 which indicates emissions from this emission point will cause predicted concentrations that are less than PSD Significant Impact Levels (SIL) for CO.

# Operational Requirements with Associated Monitoring and Recordkeeping

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- 1. As required by §63.6(e)(1)(i), the owner or operator must at all times operate and maintain the foundry in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by 40 CFR, Part 63, Subpart EEEEE National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries.
- 2. The owner or operator will take actions to make the 804 casting line more efficient and minimize emissions, these include:
  - a. The facility shall only use a pressure pour system to pour metal on the 804 casting line.
  - b. The facility shall implement a continual process improvement program to minimize VOC and CO emissions. This program shall include methods for evaluating VOCcontaining additives and materials that will minimize the amount of VOC in the core and mold making (includes mold release) processes and reduce the amount of VOC used.
- 3. The owner or operator shall not process more than 43.8 tons per hour of iron (or iron alloys) for any pouring or casting operation on the 804 casting line.
- 4. The owner or operator shall not process more than 320,000 tons of iron on the 804 casting line per twelve month rolling period.
- 5. The facility shall maintain all records regarding the continual process improvement program for the 804 casting line.
- 6. The facility shall document if the pressure pour system is not used to pour the metal on the 804 casting line
- 7. The owner or operator shall record the hourly amount of metal poured on the 804 casting line. The hourly amount may be calculated by the facility by dividing the total amount of iron used each day (calendar or production) by the hours of operation of the pouring area. If

- a production day, as set internally by the facility, is used as the basis, the production day may not exceed 24 hours and all iron poured must be accounted for in the given production day.
- 8. The owner or operator shall record the monthly and 12 month rolling total amounts of iron cast or poured on the 804 casting line, on a monthly basis.
- 9. The VOC weight loss of the materials used in the cores processed on the 804 casting line shall not exceed 1.22 pounds VOC per ton of core manufactured, as a weighted average over a 12 month rolling period.
- 10. The facility shall record the VOC weight loss, in lbs of VOC per ton of core produced, of each core processed on the 804 casting line as defined in Condition 11.
- 11. The permittee shall maintain the Ohio Cast Metals Association (OCMA) emission test data sheet for each core processed on the 804 casting line. If this test data is not available, such as for purchased cores or cores printed using 3-D techniques, the permittee may assume a VOC emission rate of 10.8 lbs VOC/ton of core for those cores. Processed cores using an innovative technique other than 3-D may also assume a VOC emission rate of 10.8 lbs VOC/ton of core produced, if the Department agrees that the procedure used to estimate worst-case VOC emission rates for the technique is equivalent to the OCMA test.
- 12. If any cores with a recorded VOC weight loss greater than 1.22 lbs VOC/ton of core are used in a month, the facility shall calculate the weighted average VOC emission rate for the calendar month, and demonstrate that that the weighted average VOC emission rate for the 804 casting line remains under the standard set in Condition 5G. If the monthly calculated weighted average is less than 1.22 lbs VOC/ton of core, a 12 month rolling total does not need to be calculated.
- 13. The owner or operator shall calculate the annual emissions of PM, PM<sub>10</sub>, and PM<sub>2.5</sub>, in tons per year on a calendar year basis, for a period of five years following resumption of regular operations and maintain a record of regular operations after the change, as required in IAC 567-33.3(18)"f"(4). This information shall be retained by the owner or operator for a period of ten years after project 15-316 is completed. This calculation shall include the emissions from all casting line sources at the facility (i.e. the 801, 802 and 804 casting line emission sources, and including EP 012, EP CLRBH4, EP 109 and EP 023). "Regular operations" shall be defined for project 15-316 as having completed all allowed construction.
- 14. The facility shall notify the Department in writing within 30 days after completing all allowed construction under project 15-316.
- 15. The owner or operator shall submit a report to the department if the annual emissions, in tons per year, from project 15-316 exceed the baseline actual emissions by an amount that is "significant" as defined in IAC 567-33.3(1) for that pollutant. The baseline actual emissions are set at 87.9 tons per year for PM and PM<sub>10</sub>, and 87.5 tons per year for PM<sub>2.5</sub>.

Authority for Requirement: DNR Construction Permit See Table: D804 Cooling Shed

#### **NSPS/NESHAP Applicability**

This emission point is subject to 40 CFR 63 Subpart EEEEE National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries.

Authority for Requirement: DNR Construction Permit See Table: D804 Cooling Shed

567 IAC 23.1(4) "de"

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Table: 804CS EP

Emission Point Number	Emission Unit Number	Stack Height, (ft, from ground)	Stack Opening (inches, dia.)	Exhaust Flowrate (scfm)	Exhaust Temp. (°F)	Discharge Style
804CS9	804CS	110	128	264,000	100	Vertical Unobstructed
804CS10	804CS	110	128	264,000	100	Vertical Unobstructed

Authority for Requirement: DNR Construction Permits specified in Table: 804CS EP

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes No No
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

## Emission Point ID Number: EP 804SS1 and 804SS2

Associated Emission Unit ID Number: See below table

Emission Unit Description	Raw Material/Fuel	Allowed capacity
804 Lump Breaker 1 (EU 804LB1)	Sand	
804 Lump Breaker 2 (EU 804LB2)	Sand	
804 Punchout (EU 804PO)	Metal/Sand	
804 Pouring (EU 804POUR)	Metal	
804 Sand Cooler 1 (EU 804SC1)	Sand	
804 Sand Cooler 2 (EU 804SC2)	Sand	
804 Shakeout 1 (EU 804SO1)	Metal/Sand	43.8 tons metal per hour (production
804 Shakeout 2 (EU 804SO2)	Metal/Sand	daily average)
804 Mixer 1 (EU 804MIX1)	Sand	
804 Mixer 2 (EU 804MIX2)	Sand	
804 Mixer 3 (EU 804MIX3)	Sand	
804 Cyclone 1 (EU 804CY1)	Sand	
804 Cyclone 2 (EU 804CY2)	Sand	
804 Gas Torches (EU 804TOR)	Natural Gas	32 MMBtu/hr combined for all torches
804 Duct Burner 1 (EU 804DB1)	Natural Gas	150,000 Btu/hr
804 Duct Burner 2 (EU 804DB2)	Natural Gas	150,000 Btu/hr

Emissions Control Equipment ID Number: 804BH

Emissions Control Equipment Description: Mold Line 804 Sand System Baghouse

# **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the following specified levels.

#### **BACT Emission Limits:**

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit: 3.40 lb/ton (1) (2)

Authority for Requirement: DNR Construction Permit 11-A-437-P4 and 11-A-438-P4

Pollutant: Carbon Monoxide (CO) Emission Limit: 8.30 lb/ton<sup>(1)</sup> (2)

Authority for Requirement: DNR Construction Permit 11-A-437-P4 and 11-A-438-P4

- (1) Total emission limits for all emission units in the 804 Sand System permits (EP 804SS1 and EP 804SS2) and the Cooling Shed (EP 804CS9 and EP 804CS10). These four emission points shall be tested individually. The permittee shall demonstrate compliance with the emission limits by summing the results of the four individual stack tests together to demonstrate compliance with the BACT emission limit in this permit.
- <sup>(2)</sup> This is an average over the production day, not to exceed 24 hours.

Authority for Requirement: DNR Construction Permit 11-A-437-P4 and 11-A-438-P4

#### **Other Emission Limits:**

Pollutant: Opacity

Emission Limits: 40 % (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 11-A-437-P4 and 11-A-438-P4

(1) If visible emissions are observed the owner/operator shall promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Opacity

Emission Limits: 20 % (2)

Authority for Requirement: 567 IAC 23.1(4)"de"

DNR Construction Permit 11-A-437-P4 and 11-A-438-P4

As specified in 40 CFR Part 63 Subpart EEEEE, §63.7690(a)(7), for each building or structure housing any iron and steel foundry emissions source at the iron and steel foundry, the permittee must not discharge any fugitive emissions to the atmosphere from foundry operations that exhibit opacity greater than 20 percent (6-minute average), except for one 6-minute average per hour that does not exceed 27 percent opacity.

Pollutant: PM<sub>10</sub>

Emission Limits: 4.0 lb/hr (3)

Authority for Requirement: DNR Construction Permit 11-A-437-P4 and 11-A-438-P4

(3) Hourly combined emission rates for EP 804SS1 and EP 804SS2 utilized in the modeling analysis in project 18-179 which indicates emissions from this emission point will cause concentrations that are less than the applicable PM10 National Ambient Air Quality Standards (NAAQS).

Pollutant: PM<sub>10</sub>

Emission Limits: 3.0 lb/hr (4)

Authority for Requirement: DNR Construction Permit 11-A-437-P4 and 11-A-438-P4

(4) Maximum limit for EP 804SS1 or EP 804SS2 only utilized in the modeling analysis in project 18-179 which indicates emissions from this emission point will cause concentrations that are less than the applicable PM<sub>10</sub> (NAAQS).

Pollutant: Particulate Matter (PM) Emission Limits: 0.010 gr/dscf (5)

Authority for Requirement: 567 IAC 23.1(4)"de"

DNR Construction Permit 11-A-437-P4 and 11-A-438-P4

- (5) As specified in 40 CFR Part 63, Subpart EEEEE, §63.7690(a)(5), for each pouring station at an existing iron and steel foundry, the permittee must not discharge emissions through a conveyance to the atmosphere that exceed either the limit for PM in paragraph (i) below or, alternatively the limit for total metal HAP in paragraph (ii) of this section:
  - (i) 0.010 gr/dscf of PM, or
  - (ii) 0.0008 gr/dscf of total metal HAP.

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limits: 500 ppm<sub>y</sub>

Authority for Requirement: 567 IAC 23.3(3)"e"

DNR Construction Permit 11-A-437-P4 and 11-A-438-P4

Pollutant: Carbon Monoxide (CO) Emission Limits: 540.0 lb/hr <sup>(6)</sup>

Authority for Requirement: DNR Construction Permit 11-A-437-P4 and 11-A-438-P4

(6) Hourly combined emission rate for EP 804SS1, EP 804SS2, EP 804CS9 and EP 804CS10 utilized in project 18-179 which indicates emissions from this emission point will cause predicted concentrations that are less than PSD Significant Impact Levels (SIL) for CO.

Pollutant: Total Metal HAP

Emission Limits: 0.0008 gr/dscf (5)

Authority for Requirement: 567 IAC 23.1(4)"de"

DNR Construction Permit 11-A-437-P4 and 11-A-438-P4

- (5) As specified in 40 CFR Part 63, Subpart EEEEE, §63.7690(a)(5), for each pouring station at an existing iron and steel foundry, the permittee must not discharge emissions through a conveyance to the atmosphere that exceed either the limit for PM in paragraph (i) below or, alternatively the limit for total metal HAP in paragraph (ii) of this
  - (i) 0.010 gr/dscf of PM, or
  - (ii) 0.0008 gr/dscf of total metal HAP.

#### Operational Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- 1. As specified in §63.7710(a), and required by §63.6(e)(1)(i), the owner or operator must at all times operate and maintain this foundry in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by 40 CFR, Part 63, Subpart EEEEE National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries.
- 2. As required by §63.7710(b), the owner or operator must prepare and operate at all times according to a written operation and maintenance plan for each capture and collection system and control device for an emissions source subject to an emission limit in §63.7690(a). The operation and maintenance plan must include procedures for igniting gases from mold vents in pouring areas and pouring stations that use a sand mold system. This operation and maintenance plan is subject to approval by the Iowa DNR, and must contain the applicable elements described in paragraphs (b)(1) through (b)(6) of section §63.7710(b).
- 3. The owner or operator will follow the procedures for igniting mold vent gases according to the requirements in the operation and maintenance plan required by §63.7710(b)(6).
- 4. As required by §63.7720(c), the owner or operator must develop a written startup, shutdown, and malfunction plan according to the provisions in §63.6(e)(3).
- 5. Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The owner or operator must maintain a current copy of the operation and maintenance plans required by §63.7710(b) onsite and available for inspection upon request. The plans shall be maintained for the life of the foundry or until the foundry is no longer subject to the requirements of 40

ZLP 41 02-TV-012R3, 03/24/23

- CFR, Part 63, Subpart EEEEE National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries.
- 6. This line shall only be used for making green sand molds.
- 7. The owner or operator shall inspect and maintain the control equipment according to manufacturer's specifications.
- 8. For each negative pressure baghouse or positive pressure baghouse equipped with a stack that is applied to meet any PM or total metal HAP emissions limitation in this subpart, you must at all times monitor the relative change in PM loadings using a bag leak detection system according to the requirements in §63.7741(b).
- 9. For each baghouse, regardless of type, that is applied to meet any PM or total metal HAP emissions limitation in this subpart, you must conduct inspections at their specified frequencies according to the requirements specified in paragraphs (c)(1) through (8) of §63.7740(c).
  - (1) Monitor the pressure drop across each baghouse cell each day to ensure pressure drop is within the normal operating range identified in the manual.
  - (2) Confirm that dust is being removed from hoppers through weekly visual inspections or other means of ensuring the proper functioning of removal mechanisms.
  - (3) Check the compressed air supply for pulse-jet baghouses each day.
  - (4) Monitor cleaning cycles to ensure proper operation using an appropriate methodology.
  - (5) Check bag cleaning mechanisms for proper functioning through monthly visual inspections or equivalent means.
  - (6) Make monthly visual checks of bag tension on reverse air and shaker-type baghouses to ensure that bags are not kinked (kneed or bent) or lying on their sides. You do not have to make this check for shaker-type baghouses using self-tensioning (spring-loaded) devices.
  - (7) Confirm the physical integrity of the baghouse through quarterly visual inspections of the baghouse interior for air leaks.
  - (8) Inspect fans for wear, material buildup, and corrosion through quarterly visual inspections, vibration detectors, or equivalent means.
- 10. For each negative pressure baghouse or positive pressure baghouse equipped with a stack that is applied to meet any PM or total metal HAP emissions limitation in this subpart, the owner or operator must install, operate, and maintain a bag leak detection system according to the requirements in paragraphs (b)(1) through (b)(7) of §63.7741(b).
  - (1) The system must be certified by the manufacturer to be capable of detecting emissions of particulate matter at concentrations of 10 milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.
  - (2) The bag leak detection system sensor must provide output of relative particulate matter loadings and the owner or operator shall continuously record the output from the bag leak detection system using electronic or other means ( *e.g.*, using a strip chart recorder or a data logger).
  - (3) The system must be equipped with an alarm that will sound when an increase in relative particulate loadings is detected over the alarm set point established in the

- operation and maintenance plan, and the alarm must be located such that it can be heard by the appropriate plant personnel.
- (4) The initial adjustment of the system must, at minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time (if applicable).
- (5) Following the initial adjustment, do not adjust the sensitivity or range, averaging period, alarm set point, or alarm delay time without approval from the Administrator. Except, once per quarter, you may adjust the sensitivity of the bag leak detection system to account for seasonable effects including temperature and humidity according to the procedures in the operation and maintenance plan required by §63.7710(b).
- (6) For negative pressure, induced air baghouses, and positive pressure baghouses that are discharged to the atmosphere through a stack, the bag leak detector sensor must be installed downstream of the baghouse and upstream of any wet scrubber.
- (7) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.
- 11. For each baghouse, the permittee shall:
  - (1) Inspect and maintain the baghouse according to the requirements of §63.7740(c)(1) through (8) and record all information needed to document conformance with these requirements; and
  - (2) If the baghouse is equipped with a bag leak detection system, maintaining records of the times the bag leak detection system sounded, and for each valid alarm, the time you initiated corrective action, the corrective action taken, and the date on which corrective action was completed.
- 12. For each capture system and control device for an emissions source subject to an emissions limit in §63.7690(a), you must demonstrate continuous compliance with the operation and maintenance requirements of §63.7710 by:
  - (1) Making monthly inspections of capture systems and initiating corrective action according to §63.7710(b)(1) and recording all information needed to document conformance with these requirements;
  - (2) Performing preventative maintenance for each control device according to the preventive maintenance plan required by §63.7710(b)(3) and recording all information needed to document conformance with these requirements;
  - (3) Operating and maintaining each bag leak detection system according to the site-specific monitoring plan required by §63.7710(b)(4) and recording all information needed to demonstrate conformance with these requirements;
  - (4) Initiating and completing corrective action for a bag leak detection system alarm according to the corrective action plan required by §63.7710(b)(5) and recording all information needed to document conformance with these requirements; and
  - (5) Igniting gases from mold vents according to the procedures in the plan required by §63.7710(b)(6). (Any instance where you fail to follow the procedures is a deviation that must be included in your semiannual compliance report.)
- 13. You must maintain a current copy of the operation and maintenance plans required by §63.7710(b) onsite and available for inspection upon request. You must keep the plans for the life of the iron and steel foundry or until the iron and steel foundry is no longer subject to

- the requirements of this subpart.
- 14. The owner or operator shall meet all of the notification requirements as specified in 40 CFR, Part 63, Subpart EEEEE, §63.7750.
- 15. The owner or operator shall submit reports as required by 40 CFR 63.7751 and maintain records as required by 40 CFR 63.7752. These required records must be maintained for five years (40 CFR 63.7753(b)).
- 16. The owner or operator shall keep records of control equipment inspections and maintenance.
- 17. The owner or operator will take actions to make the 804 casting line more efficient and minimize emissions, these include:
  - a. The facility shall only use a pressure pour system to pour metal.
  - b. The facility shall implement a continual process improvement program to minimize VOC and CO emissions. This program shall include methods for evaluating materials that will minimize the amount of VOC in the core making process and reduce the amount of VOC used.
- 18. The facility shall maintain all records regarding the continual process improvement program for the 804 casting line.
- 19. The facility shall document if the pressure pour system is not used to pour the metal on the 804 casting line.
- 20. The owner or operator shall not process more than 43.8 tons per hour of iron (or iron alloys) for any pouring or casting operation on the 804 casting line.
- 21. The owner or operator shall record the hourly amount of metal poured on the 804 casting line. The hourly amount may be calculated by the facility by dividing the total amount of iron used each day (calendar or production) by the hours of operation of the pouring area. If a production day, as set internally by the facility, is used as the basis, the production day may not exceed 24 hours and all iron poured must be accounted for in the given production day.
- 22. The owner or operator shall not process more than 320,000 tons of iron on the 804 casting line per twelve month rolling period.
- 23. The owner or operator shall record the monthly and 12 month rolling total amounts of iron cast or poured on the 804 casting line, on a monthly basis.
- 24. The VOC weight loss of the materials used in the cores processed on the 804 casting line shall not exceed 1.22 pounds VOC per ton of core manufactured, as a weighted average over a 12 month rolling period.
- 25. The facility shall record the VOC weight loss, in lbs of VOC per ton of core produced, of each core processed on the 804 casting line.

- 26. The permittee shall maintain the Ohio Cast Metals Association (OCMA) emission test data sheet for each core processed on the 804 casting line. If this test data is not available, such as for purchased cores or cores printed using 3-D techniques, the permittee may assume a VOC emission rate of 10.8 lbs VOC/ton of core for those cores. Processed cores using an innovative technique other than 3-D may also assume a VOC emission rate of 10.8 lbs VOC/ton of core produced, if the Department agrees that the procedure used to estimate worst-case VOC emission rates for the technique is equivalent to the OCMA test.
- 27. If any cores with a recorded VOC weight loss greater than 1.22 lbs VOC/ton of core are used in a month, the facility shall calculate the weighted average VOC emission rate for the calendar month, and demonstrate that that the weighted average VOC emission rate for the 804 casting line remains under the standard set in Condition 24. If the monthly calculated weighted average is less than 1.22 lbs VOC/ton of core, a 12 month rolling total does not need to be calculated.
- 28. The owner or operator shall calculate the annual emissions of PM, PM<sub>10</sub>, and PM<sub>2.5</sub>, in tons per year on a calendar year basis, for a period of five years following resumption of regular operations and maintain a record of regular operations after the change, as required in IAC 567-33.3(18)"f"(4). This information shall be retained by the owner or operator for a period of ten years after project 15-316 is completed. This calculation shall include the emissions from all casting line sources at the facility (i.e. the 801, 802 and 804 casting line emission sources, and including EP 012, EP CLRBH4, EP 109 and EP 023). "Regular operations" shall be defined for project 15-316 as having completed all allowed construction.
- 29. The facility shall notify the Department in writing within 30 days after completing all allowed construction under project 15-316.
- 30. The owner or operator shall submit a report to the department if the annual emissions, in tons per year, from project 15-316 exceed the baseline actual emissions by an amount that is "significant" as defined in IAC 567-33.3(1) for that pollutant. The baseline actual emissions are set at 87.9 tons per year for PM and PM<sub>10</sub>, and 87.5 tons per year for PM<sub>2.5</sub>.

Authority for Requirement: DNR Construction Permit 11-A-437-P4 and 11-A-438-P4 567 IAC 23.1(4)"de"

#### **NSPS/NESHAP Applicability**

This emission point is subject to 40 CFR 63 Subpart EEEEE National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries.

Authority for Requirement: DNR Construction Permit 11-A-437-P4 and 11-A-438-P4 567 IAC 23.1(4)"de"

ZLP 45 02-TV-012R3, 03/24/23

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height (feet from ground): 110 Stack Opening, (inches, dia.): 112 Exhaust Flow Rate (acfm): 270,000 Exhaust Temperature (°F): 120 Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 11-A-437-P4 and 11-A-438-P4

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

#### **Stack Testing:**

Pollutant – Particulate Matter (PM)<sup>(1)</sup>

Stack Test to be Completed – Every 5 years

Test Method – 40 CFR 60, Appendix A, Method 5

Authority for Requirement: 567 IAC 23.1(4)"de"

DNR Construction Permit 11-A-437-P4 and 11-A-438-P4

Pollutant – Total Metal HAP<sup>(1)</sup>

Stack Test to be Completed – Every 5 years

Test Method - 40 CFR 63, Appendix A, Method 320 or 40 CFR 60, Appendix A,

Method 18

Authority for Requirement: 567 IAC 23.1(4)"de"

DNR Construction Permit 11-A-437-P4 and 11-A-438-P4

Pollutant – Opacity<sup>(2)</sup>

Stack Test to be Completed – Every 6 months

Test Method - 40 CFR 60, Appendix A, Method 9

Authority for Requirement: 567 IAC 23.1(4)"de"

DNR Construction Permit 11-A-437-P4 and 11-A-438-P4

ZLP 46 02-TV-012R3, 03/24/23

<sup>(1)</sup> Testing shall be conducted per 40 CFR §63.7734 to demonstrate compliance with either the PM limit or the Total Metal HAP limit.

Plant-wide, as specified in 40 CFR Part 63, Subpart EEEEE, §63.7731, the permittee must conduct subsequent performance tests to demonstrate compliance with the opacity limit in §63.7690(a)(7) no less frequently than once every 6 months.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🛛 No 🗌
A 4 1 C B 1 C 7 C 7 C 7 C 7 C 7 C 7 C 7 C 7 C 7 C	

Authority for Requirement: 567 IAC 22.108(3)

# **CAM Plan for CE 804BH Baghouse**

See Section IV Compliance Assurance Monitoring (CAM)

#### **Emission Point ID Number: 804M**

#### Associated Equipment

Associated Emission Unit ID Numbers: See below table Emissions Control Equipment ID Number: CE 804MBH Emissions Control Equipment Description: Baghouse

EU ID	Description	Raw Material/Fuel	Maximum Rated Capacity
804M	804 Attrition Mill	N/L-4-1	47 tons metal/hr (daily average)
804SP	804 Shaker Pan	Metal	120 molds/hr (design)

<u>Note</u>: At the time of the Title V permit issuance, construction has not yet been completed on the physical changes described in DNR Construction Permit 17-A-718-S2. The facility is still considered in compliance with Construction Permit Condition 10A. Construction must be completed by 04/30/2024.

# **Applicable Requirements**

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limits: 40 % (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 17-A-718-S2

(1) If visible emissions are observed the owner/operator is required to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM<sub>10</sub>

Emission Limits: 1.71 lb/hr

Authority for Requirement: DNR Construction Permit 17-A-718-S2

Pollutant: Particulate Matter (PM) Emission Limits: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

DNR Construction Permit 17-A-718-S2

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- 1. The owner or operator shall install and continuously operate a bag leak detection system according to the following requirements:
  - a. The bag leak detection system sensor must provide output of relative particulate matter loadings and the owner or operator shall continuously record the output from the bag leak detection system using electronic or other means
  - b. The system must be equipped with an alarm that will be triggered when an increase in relative particulate loadings is detected over the alarm notification set point established in the site-specific monitoring plan, with the alarm notification sent to the appropriate plant personnel.
  - c. Initial adjustment of the system to establish a baseline output shall be determined within an initial setup period that is sufficient to capture fluctuations in the normal baseline as well as capturing cleaning signal spikes. A dye leak test (ultraviolet or equivalent) shall be used prior to and following the conclusion of the setup period to demonstrate no control system leakage during the monitoring system setup period.
  - d. Following the initial setup, the owner or operator shall not adjust the sensitivity, range, averaging period, alarm set point, or alarm delay time without following the procedures outlined in Construction Permit Condition c above.
- 2. The owner or operator shall develop a site-specific bag leak detection system monitoring plan, including operation and maintenance procedures, consistent with the recommendations contained in the U.S. Environmental Protection Agency guidance document "Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015) and comparable bag leak detection industry quality control standards. The owner or operator shall operate and maintain the bag leak detection system according to the site-specific monitoring plan at all times.
- 3. The owner or operator shall develop an operating and maintenance plan for the baghouse. The plan shall include a preventative maintenance schedule for routine and long-term maintenance consistent with good air pollution control practice and comparable baghouse industry quality control standards. The owner or operator shall operate and maintain the baghouse according to the plan at all times.
- 4. The owner or operator shall develop a corrective action plan for the baghouse. The plan must include the requirement that, in the event a bag leak detection system alarm notification is triggered, the facility shall determine the cause of the alarm notification, initiate corrective action to correct the cause of the alarm notification, and complete corrective action(s) as prescribed in the plan.
- 5. The owner or operator shall maintain a record of all bag leak detection alarm notifications, baghouse inspections and maintenance, and any actions resulting from bag leak detection alarm notification occurrences, inspections, and maintenance of the baghouse.
- 6. The owner or operator shall send the initial site-specific monitoring plan for the bag leak detection system, and any updates to the inspection or quality control standard section within the plan, to the Department for review.

ZLP 49 02-TV-012R3, 03/24/23

- 7. The owner or operator shall calculate the annual emissions of PM, PM<sub>10</sub>, and PM<sub>2.5</sub> in tons per year on a calendar basis, for a period of five years following resumption of regular operations and maintain a record of regular operations after the change, as required in IAC 567-33.3(18)"f"(4). This information shall be retained by the owner or operator for a period of ten years after project 17-199 and 17-409 are completed. This record of regular operations after the change shall be a documentation of emissions from all emission units named in project 17-199 as part of the Phase 1 and project 17-409 as part of the Phase 2 projects for complying with the new OSHA requirements for silica exposure. "Resumption of regular operations" shall be defined for project 17-199 and 17-409 as having completed all allowed construction associated with the Phase 1 and Phase 2 projects for complying with the new OSHA requirements for silica exposure.
- 8. The owner or operator shall submit a report to the Department if the annual emissions, in tons per year, from the units named in projects 17-199 and 17-409 as part of the Phase 1 and Phase 2 projects for complying with the new OSHA requirements for silica exposure, exceed the baseline actual emissions by an amount that is "significant" as defined in IAC 567-33.3(1) for that pollutant. Note that the units named include contemporaneous increases and units permitted under IAC 567-22.1(2)"w". The baseline actual emissions are set at 46.55 tons for PM and PM<sub>10</sub> and 46.50 tons for PM<sub>2.5</sub>

Authority for Requirement: DNR Construction Permit 17-A-718-S2

## **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 80 Stack Opening, (inches, dia.): 70 Exhaust Flow Rate (scfm): 94,700

Exhaust Temperature (°F): 100

Discharge Style: Vertical unobstructed

Authority for Requirement: DNR Construction Permit 17-A-718-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

# <u>Monitoring Requirements</u> The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Compliance Assurance Monitoring (CAM) Plan Required? Yes ⊠ No □

Authority for Requirement: 567 IAC 22.108(3)

# **CAM Plan for CE 804MBH**

See Section IV Compliance Assurance Monitoring (CAM)

#### **Emission Point ID Number: EP 804MT1**

#### Associated Equipment

Associated Emission Unit ID Number: 804MT1

Emissions Control Equipment ID Number: 804MTBH Emissions Control Equipment Description: Fabric Filter

Emission Unit vented through this Emission Point: 804MT1 Emission Unit Description: 804 Magnesium Treatment

Raw Material/Fuel: Metal

Rated Capacity: 43.8 tons of metal/hr (daily average); 720 feet/min (design)

<u>Note</u>: At the time of the Title V permit issuance, construction has not yet been completed on the physical changes described in DNR Construction Permit 11-A-606-S3. The facility is still considered in compliance with Construction Permit Condition 10A. Construction must be completed by 04/30/2024.

# **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the following specified levels.

Pollutant: Opacity

Emission Limits: 40 % (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 11-A-606-S3

(1) If visible emissions are observed the owner/operator is required to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM<sub>10</sub>

Emission Limits: 0.45 lb/hr

Authority for Requirement: DNR Construction Permit 11-A-606-S3

Pollutant: Particulate Matter (PM) Emission Limits: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

DNR Construction Permit 11-A-606-S3

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- 1. The owner or operator shall install and continuously operate a bag leak detection system according to the following requirements:
  - a. The bag leak detection system sensor must provide output of relative particulate matter loadings and the owner or operator shall continuously record the output from the bag leak detection system using electronic or other means
  - b. The system must be equipped with an alarm that will be triggered when an increase in relative particulate loadings is detected over the alarm notification set point established in the site-specific monitoring plan, with the alarm notification sent to the appropriate plant personnel.
  - c. Initial adjustment of the system to establish a baseline output shall be determined within an initial setup period that is sufficient to capture fluctuations in the normal baseline as well as capturing cleaning signal spikes. A dye leak test (ultraviolet or equivalent) shall be used prior to and following the conclusion of the setup period to demonstrate no control system leakage during the monitoring system setup period.
  - d. Following the initial setup, the owner or operator shall not adjust the sensitivity, range, averaging period, alarm set point, or alarm delay time without following the procedures outlined in Construction Permit Condition c above.
- 2. The owner or operator shall develop a site-specific bag leak detection system monitoring plan, including operation and maintenance procedures, consistent with the recommendations contained in the U.S. Environmental Protection Agency guidance document "Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015) and comparable bag leak detection industry quality control standards. The owner or operator shall operate and maintain the bag leak detection system according to the site-specific monitoring plan at all times.
- 3. The owner or operator shall develop an operating and maintenance plan for the baghouse. The plan shall include a preventative maintenance schedule for routine and long-term maintenance consistent with good air pollution control practice and comparable baghouse industry quality control standards. The owner or operator shall operate and maintain the baghouse according to the plan at all times.
- 4. The owner or operator shall develop a corrective action plan for the baghouse. The plan must include the requirement that, in the event a bag leak detection system alarm notification is triggered, the facility shall determine the cause of the alarm notification, initiate corrective action to correct the cause of the alarm notification, and complete corrective action(s) as prescribed in the plan.
- 5. The owner or operator shall maintain a record of all bag leak detection alarm notifications, baghouse inspections and maintenance, and any actions resulting from bag leak detection alarm notification occurrences, inspections, and maintenance of the baghouse.
- 6. The owner or operator shall send the initial site-specific monitoring plan for the bag leak detection system, and any updates to the inspection or quality control standard section within the plan, to the Department for review.
- 7. The owner or operator shall calculate the annual emissions of PM, PM<sub>10</sub>, and PM<sub>2.5</sub>, in tons per year on a calendar year basis, for a period of five years following resumption of regular

operations and maintain a record of regular operations after the change, as required in IAC 567-33.3(18)"f"(4). This information shall be retained by the owner or operator for a period of ten years after project 15-316 is completed. This calculation shall include the emissions from all casting line sources at the facility (i.e. the 801, 802 and 804 casting line emission sources, and including EP 012, EP CLRBH4, EP 109 and EP 023). "Regular operations" shall be defined for project 15-316 as having completed all allowed construction.

8. The owner or operator shall submit a report to the department if the annual emissions, in tons per year, from project 15-316 exceed the baseline actual emissions by an amount that is "significant" as defined in IAC 567-33.3(1) for that pollutant. The baseline actual emissions are set at 87.9 tons per year for PM and PM<sub>10</sub>, and 87.5 tons per year for PM<sub>2.5</sub>.

Authority for Requirement: DNR Construction Permit 11-A-606-S3

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height (feet from ground): 80 Stack Opening, (inches, dia.): 37.2 Exhaust Flow Rate (acfm): 30,000 Exhaust Temperature (°F): 90

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 11-A-606-S3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

# **Monitoring Requirements**

Wontoring Requirements	
The owner/operator of this equipment shall comply with the monitoria	ng requirements listed below.
Agency Approved Operation & Maintenance Plan Required?	Yes No No
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🔀 No 🗌
Authority for Requirement: 567 IAC 22.108(3)	

See Section IV Compliance Assurance Monitoring (CAM)

**CAM Plan for CE-804MTBH Baghouse** 

# Sand

**Emission Point ID Number: EP ESP** 

<u>Associated Equipment</u>

Emissions Control Equipment ID Number: CE ESP

Emissions Control Equipment Description: East Sand Pelletizer Dust Silo Bin Vent

Emission Unit vented through this Emission Point: P-174

Emission Unit Description: East Sand Pelletizer

Raw Material/Fuel: Sand Rated Capacity: 2.55 tons/hr

# **Applicable Requirements**

### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 40%

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter Emission Limit: 0.05 gr/scf

Authority for Requirement: 567 IAC 23.4(6)

Note: this emission unit is covered by the DNR Construction Permit 78-A-022-S1 which contains no conditions.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes No 🖂

Facility Maintained Operation & Maintenance Plan Required? Yes No 🗌

Compliance Assurance Monitoring (CAM) Plan Required? Yes No 🖂

Authority for Requirement: 567 IAC 22.108(3)

## **Emission Point ID Number: IIBH2**

#### Associated Equipment

#### **Table IIBH2**

Emission Point Number	Control Equipment Description/ Number	Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity (ton/hr)	DNR Construction Permit
			Belt 412/413			
			Belt 408/409			
			Belt 409/410		1.50 . /1	
			Belt 410/412		150 tons/hr (waste sand)	
			Belt 411A/412A			
			Belt 435/409			
	D 1		G 1			
IIBH2	Baghouse CE IIBH2		Belt 103C/103D	Sand	150 tons/hr	
			Belt 103B/103C			
			Belt 103B/103G			
			Belt 103G/103E			
			Belt 103E/103F	03E/103F (new sand	(new sand)	
			Belt 103F/105			
			Belt 105/103H			
		804SH	804 Sand Hopper			

<u>Note</u>: At the time of the Title V permit issuance, construction has not yet been completed on the physical changes described in DNR Construction Permit 77-A-121-S11. The facility is still considered in compliance with Construction Permit Condition 10A. Construction must be completed by 04/30/2024.

# **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

## DNR Construction Permits in Table IIBH2

(1) An exceedance of the indicator opacity of "no visible emissions" will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM<sub>10</sub>

Emission Limit(s): 1.0 lb/hr

Authority for Requirement: DNR Construction Permits in Table IIBH2

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

DNR Construction Permits in Table IIBH2

#### Operational Requirements with Associated Monitoring and Recordkeeping

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- 1. The owner or operator shall install and continuously operate a bag leak detection system according to the following requirements:
  - a. The bag leak detection system sensor must provide output of relative particulate matter loadings and the owner or operator shall continuously record the output from the bag leak detection system using electronic or other means
  - b. The system must be equipped with an alarm that will be triggered when an increase in relative particulate loadings is detected over the alarm notification set point established in the site-specific monitoring plan, with the alarm notification sent to the appropriate plant personnel.
  - c. Initial adjustment of the system to establish a baseline output shall be determined within an initial setup period that is sufficient to capture fluctuations in the normal baseline as well as capturing cleaning signal spikes. A dye leak test (ultraviolet or equivalent) shall be used prior to and following the conclusion of the setup period to demonstrate no control system leakage during the monitoring system setup period.
  - d. Following the initial setup, the owner or operator shall not adjust the sensitivity, range, averaging period, alarm set point, or alarm delay time without following the procedures outlined in Construction Permit Condition c above.
- 2. The owner or operator shall develop a site-specific bag leak detection system monitoring plan, including operation and maintenance procedures, consistent with the recommendations contained in the U.S. Environmental Protection Agency guidance document "Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015) and comparable bag leak detection industry quality control standards. The owner or operator shall operate and maintain the bag leak detection system according to the site-specific monitoring plan at all times.
- 3. The owner or operator shall develop an operating and maintenance plan for the baghouse. The plan shall include a preventative maintenance schedule for routine and long-term maintenance consistent with good air pollution control practice and comparable baghouse industry quality control standards. The owner or operator shall operate and maintain the baghouse according to the plan at all times.
- 4. The owner or operator shall develop a corrective action plan for the baghouse. The plan must include the requirement that, in the event a bag leak detection system alarm notification is triggered, the facility shall determine the cause of the alarm notification, initiate corrective

- action to correct the cause of the alarm notification, and complete corrective action(s) as prescribed in the plan.
- 5. The owner or operator shall maintain a record of all bag leak detection alarm notifications, baghouse inspections and maintenance, and any actions resulting from bag leak detection alarm notification occurrences, inspections, and maintenance of the baghouse.
- 6. The owner or operator shall send the initial site-specific monitoring plan for the bag leak detection system, and any updates to the inspection or quality control standard section within the plan, to the Department for review.
- 7. The owner or operator shall calculate the annual emissions of PM, PM<sub>10</sub>, and PM<sub>2.5</sub> in tons per year on a calendar basis, for a period of five years following resumption of regular operations and maintain a record of regular operations after the change, as required in IAC 567-33.3(18)"f"(4). This information shall be retained by the owner or operator for a period of ten years after project 17-199 is completed. This record of regular operations after the change shall be a documentation of emissions from all emission units named in project 17-199 as part of the Phase 1 and Phase 2 projects for complying with the new OSHA requirements for silica exposure. "Resumption of regular operations" shall be defined for project 17-199 as having completed all allowed construction associated with the Phase 1 and Phase 2 projects for complying with the new OSHA requirements for silica exposure.
- 8. The owner or operator shall submit a report to the Department if the annual emissions, in tons per year, from the units named in project 17-199 as part of the Phase 1 and Phase 2 projects for complying with the new OSHA requirements for silica exposure, exceed the baseline actual emissions by an amount that is "significant" as defined in IAC 567-33.3(1) for that pollutant. The baseline actual emissions are set at 46.55 tons for PM and PM<sub>10</sub> and 46.50 tons for PM<sub>2.5</sub>

Authority for Requirement: DNR Construction Permits in Table IIBH2

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Emission Point Number	Emission Unit Number	Stack Height, (ft, from ground)	Stack Opening (inches, dia.)	Exhaust Flowrate (scfm)	Exhaust Temp. (°F)	Discharge Style
IIBH2	808SB & 804SH	80.5	47	35,450	70	Vertical Unobstructed

Authority for Requirement: DNR Construction Permits in Table IIBH2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

# **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Compliance Assurance Monitoring (CAM) Plan Required? Yes ⊠ No □

Authority for Requirement: 567 IAC 22.108(3)

## **CAM Plan for CE IIBH2**

See Section IV Compliance Assurance Monitoring (CAM)

#### **Emission Point ID Number: SDSABH**

## Associated Equipment

Associated Emission Unit ID Number: P-162

Emissions Control Equipment ID Number: CE SDSABH

Emissions Control Equipment Description: New Sand Delivery and Storage Baghouse

Emission Unit vented through this Emission Point: P-162

Emission Unit Description: New Sand Delivery and Storage Area

Raw Material/Fuel: Sand

Rated Capacity: 27.79 tons per hour

# **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 72-A-040-S3

(1) If visible emissions are observed other than startup, shutdown, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Pollutant: PM<sub>10</sub>

Emission Limit: 0.65 lb/hr

Authority for Requirement: DNR Construction Permit 72-A-040-S3

Pollutant: Particulate Matter Emission Limit: 0.1gr/scf

Authority for Requirement: 567 IAC 23.3(2)"a"

DNR Construction Permit 72-A-040-S3

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Control equipment parameters:

1. The emissions control system must be in operation at all times that the production equipment is in operation.

Authority for Requirement: DNR Construction Permit 72-A-040-S3

### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height (feet from ground): 57 Stack Opening, (inches, dia.): 24 Exhaust Flow Rate (acfm): 12,600 Exhaust Temperature (°F): Ambient Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 72-A-040-S3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes ☐ No ⊠
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🛛 No 🗌

Authority for Requirement: 567 IAC 22.108(3)

#### **CAM Plan for CE-SDSABH Baghouse**

See Section IV Compliance Assurance Monitoring (CAM)

#### **Emission Point ID Number: EP 248**

#### Associated Equipment

Associated Emission Unit ID Number: See Table: Sand Supply/Reclaim Shed Below Emissions Control Equipment ID Number: See Table: Sand Supply/Reclaim Shed Below Emissions Control Equipment Description: See Table: Sand Supply/Reclaim Shed Below

Table: Sand Supply/Reclaim Shed

EU ID	Description	Raw Material/Fuel	Maximum Rated Capacity	Control Equipment Description and ID
808RS	West Dock Waste		95 tph	CE-248
000KS	Sand Loadout, or	Sand	(operational)	Sand Supply/Reclaim
808SS	West Dock New Sand	Sand	95 tph	Baghouse
00000	Unloading Station		(operational)	

<u>Note</u>: At the time of the Title V permit issuance, construction has not yet been completed on the physical changes described in DNR Construction Permit 97-A-139-S4. The facility is still considered in compliance with Construction Permit Condition 10A. Construction must be completed by 04/30/2024.

# **Applicable Requirements**

## Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 97-A-139-S4

(1) Visible emissions will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM<sub>10</sub>

Emission Limit: 0.81 lb/hr

Authority for Requirement: DNR Construction Permit 97-A-139-S4

Pollutant: Particulate Matter

Emission Limit: 5.4 lb/hr; 0.05 gr/dscf

Authority for Requirement: DNR Construction Permit 97-A-139-S4

567 IAC 23.4(6)

#### **Operating Requirements with Associated Monitoring and Recordkeeping:**

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- 1. The owner or operator shall install and continuously operate a bag leak detection system according to the following requirements:
  - a. The bag leak detection system sensor must provide output of relative particulate matter loadings and the owner or operator shall continuously record the output from the bag leak detection system using electronic or other means
  - b. The system must be equipped with an alarm that will be triggered when an increase in relative particulate loadings is detected over the alarm notification set point established in the site-specific monitoring plan, with the alarm notification sent to the appropriate plant personnel.
  - c. Initial adjustment of the system to establish a baseline output shall be determined within an initial setup period that is sufficient to capture fluctuations in the normal baseline as well as capturing cleaning signal spikes. A dye leak test (ultraviolet or equivalent) shall be used prior to and following the conclusion of the setup period to demonstrate no control system leakage during the monitoring system setup period.
  - d. Following the initial setup, the owner or operator shall not adjust the sensitivity, range, averaging period, alarm set point, or alarm delay time without following the procedures outlined in Construction Permit Condition c above.
- 2. The owner or operator shall develop a site-specific bag leak detection system monitoring plan, including operation and maintenance procedures, consistent with the recommendations contained in the U.S. Environmental Protection Agency guidance document "Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015) and comparable bag leak detection industry quality control standards. The owner or operator shall operate and maintain the bag leak detection system according to the site-specific monitoring plan at all times.
- 3. The owner or operator shall develop an operating and maintenance plan for the baghouse. The plan shall include a preventative maintenance schedule for routine and long-term maintenance consistent with good air pollution control practice and comparable baghouse industry quality control standards. The owner or operator shall operate and maintain the baghouse according to the plan at all times.
- 4. The owner or operator shall develop a corrective action plan for the baghouse. The plan must include the requirement that, in the event a bag leak detection system alarm notification is triggered, the facility shall determine the cause of the alarm notification, initiate corrective action to correct the cause of the alarm notification, and complete corrective action(s) as prescribed in the plan.
- 5. The owner or operator shall maintain a record of all bag leak detection alarm notifications, baghouse inspections and maintenance, and any actions resulting from bag leak detection alarm notification occurrences, inspections, and maintenance of the baghouse.
- 6. The owner or operator shall send the initial site-specific monitoring plan for the bag leak detection system, and any updates to the inspection or quality control standard section within the plan, to the Department for review.

Authority for Requirement: DNR Construction Permit 97-A-139-S4

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height (feet from ground): 58

Stack Opening, (inches): 52

Exhaust Flow Rate (scfm): 60,600 Exhaust Temperature (°F): 70

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 97-A-139-S4

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🛛 No 🗌
A 1 '4 C D ' 4 CCT IA C 22 100(2)	

Authority for Requirement: 567 IAC 22.108(3)

#### **CAM Plan for CE 248 Baghouse**

See Section IV Compliance Assurance Monitoring (CAM)

# Core

Emission Point ID Number: EP 069, 071, 072

Associated Equipment

Associated Emission Unit ID Number: P-069, P-071, P-072

# **Emission Unit Description**

**Table: Core Ovens 1** 

Emission Point Number	Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity (MMBtu/hr)	Construction Permit #
069	P-069	OSI Core Oven, Wash Dip Tank, and two Spray Guns		2.0	01-A-946-S2
071	P-071	OSI Core Oven, Wash Dip Tank, and two Spray Guns	Natural Gas	2.0	01-A-948-S2
072	P-072	OSI Core Oven, Wash Dip Tank, and two Spray Guns		2.0	01-A-949-S2

# **Applicable Requirements**

# Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permits: See Table: Core Ovens 1

(1) An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM<sub>10</sub>

Emission Limit: 0.229 lb/hr

Authority for Requirement: DNR Construction Permits: See Table: Core Ovens 1

Pollutant: Sulfur Oxides (SO<sub>x</sub>) Emission Limit: 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

DNR Construction Permits: See Table: Core Ovens 1

## For Core Wash Units Only

Pollutant: Particulate Matter (PM)

Emission Limit: 0.01 gr/scf

Authority for Requirement: 567 IAC 23.4(13)

DNR Construction Permits: See Table: Core Ovens 1

## **For Core Ovens Only**

Pollutant: Particulate Matter (PM)

Emission Limit: 0.1 gr/scf

Authority for Requirement: 567 IAC 23.3(2)"a"

DNR Construction Permits: See Table: Core Ovens 1

## Operating Requirements with Associated Monitoring and Recordkeeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. For recordkeeping purposes, any VOC emitted by the core wash units shall be accounted for in the phenolic urethane cold box (PUCB) core making operation permits.

Authority for Requirement: DNR Construction Permits: See Table: Core Ovens 1

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Emission Point Number	Emission Unit Number	Stack Height, (ft, from ground)	Stack Opening (inches, dia.)	Exhaust Flowrate (scfm)	Exhaust Temp. (°F)	Discharge Style
069	P-069	44.0	15	1200	280	Unobstructed Vertical
071	P-071	44.0	15	1200	280	Unobstructed Vertical
072	P-072	47.8	15	2400	220	Unobstructed Vertical

Authority for Requirement: DNR Construction Permits See Table: Core Ovens 1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

	_
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)	

ZLP 67 02-TV-012R3, 03/24/23

## Emission Point ID Number: EP 073 and EP 074

Associated Equipment

Associated Emission Unit ID Number: P-073 and P-074

## **Emission Unit Description**

**Table: Core Ovens 2** 

Emission Point Number	Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity (MMBtu/hr)	Construction Permit #
073	P-073	Core Oven, Wash Dip Tank, and two Spray Guns	Natural	3.0(1)	12-A-501-P2
074	P-074	Core Oven, Wash Dip Tank, and two Spray Guns	Gas	3.00	12-A-502-P2

<sup>(1)</sup> Startup maximum capacity is 6.0 MMBtu/hr of natural gas.

# **Applicable Requirements**

## Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

### **BACT Emission Limits:**

Pollutant: Opacity Emission Limit: 0%

Authority for Requirement: DNR Construction Permits: See Table: Core Ovens 2

Pollutant: PM<sub>2.5</sub>

Emission Limit: 0.09 lb/hr (1)

Authority for Requirement: DNR Construction Permits: See Table: Core Ovens 2

Pollutant: PM<sub>10</sub>

Emission Limit: 0.15 lb/hr (1)

Authority for Requirement: DNR Construction Permits: See Table: Core Ovens 2

Pollutant: Particulate Matter (1) Emission Limit: 0.15 lb/hr

Authority for Requirement: DNR Construction Permits: See Table: Core Ovens 2

Pollutant: Carbon Monoxide (CO)

Emission Limit: 0.08 lb/MMBtu; 2.16 tons/yr (1)

Authority for Requirement: DNR Construction Permits: See Table: Core Ovens 2

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit: 0.0055 lb/MMBtu; 0.14 tons/yr (1) (2)

Authority for Requirement: DNR Construction Permits: See Table: Core Ovens 2

(1) Standard applies during startup, shutdown, and malfunction.

(2) The VOC limit applies only to emissions due to natural gas combustion in the core oven.

#### **Other Emission Limits:**

Pollutant: Opacity

Emission Limit: 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permits: See Table: Core Ovens 2

(1) An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM)

Emission Limit: 0.1 gr/scf (2)

Authority for Requirement: 567 IAC 23.3(2)"a"

DNR Construction Permits: See Table: Core Ovens 2

(2) Applies to core oven.

Pollutant: Particulate Matter (PM) – State

Emission Limit: 0.01 gr/scf (3)

Authority for Requirements: 567 IAC 23.4(13)

DNR Construction Permits: See Table: Core Ovens 2

(3) Applies to core wash units.

Pollutant: Nitrogen Oxides (NO<sub>x</sub>)

Emission Limit: 0.59 lb/hr

Authority for Requirement: DNR Construction Permits: See Table: Core Ovens 2

Pollutant: Carbon Monoxide (CO)

Emission Limit: 0.49 lb/hr

Authority for Requirement: DNR Construction Permits: See Table: Core Ovens 2

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

A. For recordkeeping purposes, any VOC emitted by the core wash units shall be accounted for in the phenolic urethane cold box (PUCB) core making operation permits.

- B. The owner or operator will take actions to make the phenolic urethane cold box (PUCB) line more efficient and minimize emissions, these include:
  - a. The facility shall implement a continual process improvement program to minimize VOC and CO emissions. This program shall include methods for evaluating materials that will minimize the amount of VOC in the core making process and reduce the amount of VOC used.
- C. The facility shall maintain all records regarding the continual process improvement program for the PUCB core making line.

Authority for Requirement: DNR Construction Permits: See Table: Core Ovens 2

#### **Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.* 

	Emission Point Number	Emission Unit Number	Stack Height, (ft, from ground)	Stack Opening (inches, dia.)	Exhaust Flowrate (scfm)	Exhaust Temp. (°F)	Discharge Style
ſ	073	P-073	47	18	3470	230	Vertical Unobstructed
	074	P-074	47	18	3470	230	Vertical Unobstructed

Authority for Requirement: DNR Construction Permits: See Table: Core Ovens 2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?

Yes □ No ☑

Facility Maintained Operation & Maintenance Plan Required?

Yes □ No ☑

Compliance Assurance Monitoring (CAM) Plan Required?

Yes □ No ☑

Authority for Requirement: 567 IAC 22.108(3)

#### **Emission Point ID Number: EP 075**

#### Associated Equipment

Associated Emission Unit ID Number: P-075

Emissions Control Equipment ID Number: CE 075

Emissions Control Equipment Description: Sand Handling Baghouse

Emission Unit vented through this Emission Point: P-075

Emission Unit Description: Sand Handling System

Raw Material/Fuel: Sand

Rated Capacity: 23.5 tons per hour

<u>Note</u>: At the time of the Title V permit issuance, construction has not been completed on the physical changes described in DNR Construction Permit 13-A-190-P3. The facility is still considered in compliance with Construction Permit Condition 10A. Construction must be completed by 08/08/2025.

# **Applicable Requirements**

## Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

## **BACT Emission Limits:**

Pollutant: Opacity Emission Limit: 0%

Authority for Requirement: DNR Construction Permit 13-A-190-P3

Pollutant: PM<sub>2.5</sub>

Emission Limit: 0.004 gr/dscf

Authority for Requirement: DNR Construction Permit 13-A-190-P3

Pollutant: PM<sub>10</sub>

Emission Limit: 0.004 gr/dscf

Authority for Requirement: DNR Construction Permit 13-A-190-P3

Pollutant: Particulate Matter Emission Limit: 0.004 gr/dscf

Authority for Requirement: DNR Construction Permit 13-A-190-P3

#### **Other Emission Limits:**

Pollutant: Opacity Emission Limit: 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 13-A-190-P3

(1) An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM<sub>2.5</sub>

Emission Limit: 0.63 lb/hr

Authority for Requirement: DNR Construction Permit 13-A-190-P3

Pollutant: PM<sub>10</sub>

Emission Limit: 1.23 lb/hr

Authority for Requirement: DNR Construction Permit 13-A-190-P3

Pollutant: Particulate Matter

Emission Limit: 0.05 gr/dscf; 1.23 lb/hr Authority for Requirement: 567 IAC 23.4(6)

DNR Construction Permit 13-A-190-P3

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- 1. The owner or operator shall install and continuously operate a bag leak detection system according to the following requirements:
  - a. The bag leak detection system sensor must provide output of relative particulate matter loadings and the owner or operator shall continuously record the output from the bag leak detection system using electronic or other means
  - b. The system must be equipped with an alarm that will be triggered when an increase in relative particulate loadings is detected over the alarm notification set point established in the site-specific monitoring plan, with the alarm notification sent to the appropriate plant personnel.
  - c. Initial adjustment of the system to establish a baseline output shall be determined within an initial setup period that is sufficient to capture fluctuations in the normal baseline as well as capturing cleaning signal spikes. A dye leak test (ultraviolet or equivalent) shall be used prior to and following the conclusion of the setup period to demonstrate no control system leakage during the monitoring system setup period.
  - d. Following the initial setup, the owner or operator shall not adjust the sensitivity, range, averaging period, alarm set point, or alarm delay time without following the procedures outlined in Condition c above.
- 2. The owner or operator shall develop a site-specific bag leak detection system monitoring plan,

including operation and maintenance procedures, consistent with the recommendations contained in the U.S. Environmental Protection Agency guidance document "Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015) and comparable bag leak detection industry quality control standards. The owner or operator shall operate and maintain the bag leak detection system according to the site-specific monitoring plan at all times.

- 3. The owner or operator shall develop an operating and maintenance plan for the baghouse. The plan shall include a preventative maintenance schedule for routine and long-term maintenance consistent with good air pollution control practice and comparable baghouse industry quality control standards. The owner or operator shall operate and maintain the baghouse according to the plan at all times.
- 4. The owner or operator shall develop a corrective action plan for the baghouse. The plan must include the requirement that, in the event a bag leak detection system alarm notification is triggered, the facility shall determine the cause of the alarm notification, initiate corrective action to correct the cause of the alarm notification, and complete corrective action(s) as prescribed in the plan.
- 5. The owner or operator shall maintain a record of all bag leak detection alarm notifications, baghouse inspections and maintenance, and any actions resulting from bag leak detection alarm notification occurrences, inspections, and maintenance of the baghouse.
- 6. The owner or operator shall send the initial site-specific monitoring plan for the bag leak detection system, and any updates to the inspection or quality control standard section within the plan, to the Department for review.

Authority for Requirement: DNR Construction Permit 13-A-190-P3

## **Emission Point Characteristics**

*The emission point shall conform to the specifications listed below.* 

Stack Height (feet from ground): 80.5 Stack Opening, (inches, dia.): 47 Exhaust Flow Rate (scfm): 36,000 Exhaust Temperature (°F): 68

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 13-A-190-P3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

## **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes No 🖂

Compliance Assurance Monitoring (CAM) Plan Required? Yes ⊠ No □

Authority for Requirement: 567 IAC 22.108(3)

## **CAM Plan for CE 075 Baghouse**

See Section IV Compliance Assurance Monitoring (CAM)

## **Emission Point ID Number: EP 076**

#### Associated Equipment

Associated Emission Unit ID Number: P-076

Emissions Control Equipment ID Number: CE 076

Emissions Control Equipment Description: Sand Handling Baghouse

Emission Unit vented through this Emission Point: P-076 Emission Unit Description: Sand Handling System

Raw Material/Fuel: Sand

Rated Capacity: 33 tons per hour

<u>Note</u>: At the time of the Title V permit issuance, construction has not yet been completed on the physical changes described in DNR Construction Permit 13-A-191-P1. The facility is still considered in compliance with Construction Permit Condition 10A. Construction must be completed by 04/30/2024.

## **Applicable Requirements**

## Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

#### **BACT Emission Limits**

Pollutant: Opacity Emission Limit: 0%

Authority for Requirement: DNR Construction Permit 13-A-191-P1

Pollutant: PM<sub>2.5</sub>

Emission Limit: 0.004 gr/dscf<sup>(1)</sup>

Authority for Requirement: DNR Construction Permit 13-A-191-P1

Pollutant: PM<sub>10</sub>

Emission Limit: 0.004 gr/dscf (1)

Authority for Requirement: DNR Construction Permit 13-A-191-P1

Pollutant: Particulate Matter Emission Limit: 0.004 gr/dscf (1)

Authority for Requirement: DNR Construction Permit 13-A-191-P1

(1) Standard applies during startup, shutdown, and malfunction.

#### **Other Emission Limits**

Pollutant: Opacity Emission Limit: 40% (2)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 13-A-191-P1

(2) An exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM<sub>2.5</sub>

Emission Limit: 0.56 lb/hr

Authority for Requirement: DNR Construction Permit 13-A-191-P1

Pollutant: PM<sub>10</sub>

Emission Limit: 0.75 lb/hr

Authority for Requirement: DNR Construction Permit 13-A-191-P1

Pollutant: Particulate Matter Emission Limit: 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

DNR Construction Permit 13-A-191-P1

#### Operating Requirements with Associated Monitoring and Recordkeeping

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- 1. The owner or operator shall install and continuously operate a bag leak detection system according to the following requirements:
  - a. The bag leak detection system sensor must provide output of relative particulate matter loadings and the owner or operator shall continuously record the output from the bag leak detection system using electronic or other means
  - b. The system must be equipped with an alarm that will be triggered when an increase in relative particulate loadings is detected over the alarm notification set point established in the site-specific monitoring plan, with the alarm notification sent to the appropriate plant personnel.
  - c. Initial adjustment of the system to establish a baseline output shall be determined within an initial setup period that is sufficient to capture fluctuations in the normal baseline as well as capturing cleaning signal spikes. A dye leak test (ultraviolet or equivalent) shall be used prior to and following the conclusion of the setup period to demonstrate no control system leakage during the monitoring system setup period.
  - d. Following the initial setup, the owner or operator shall not adjust the sensitivity, range, averaging period, alarm set point, or alarm delay time without following the procedures outlined in Condition c above.

- 2. The owner or operator shall develop a site-specific bag leak detection system monitoring plan, including operation and maintenance procedures, consistent with the recommendations contained in the U.S. Environmental Protection Agency guidance document "Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015) and comparable bag leak detection industry quality control standards. The owner or operator shall operate and maintain the bag leak detection system according to the site-specific monitoring plan at all times.
- 3. The owner or operator shall develop an operating and maintenance plan for the baghouse. The plan shall include a preventative maintenance schedule for routine and long-term maintenance consistent with good air pollution control practice and comparable baghouse industry quality control standards. The owner or operator shall operate and maintain the baghouse according to the plan at all times.
- 4. The owner or operator shall develop a corrective action plan for the baghouse. The plan must include the requirement that, in the event a bag leak detection system alarm notification is triggered, the facility shall determine the cause of the alarm notification, initiate corrective action to correct the cause of the alarm notification, and complete corrective action(s) as prescribed in the plan.
- 5. The owner or operator shall maintain a record of all bag leak detection alarm notifications, baghouse inspections and maintenance, and any actions resulting from bag leak detection alarm notification occurrences, inspections, and maintenance of the baghouse.
- 6. The owner or operator shall send the initial site-specific monitoring plan for the bag leak detection system, and any updates to the inspection or quality control standard section within the plan, to the Department for review.

Authority for Requirement: DNR Construction Permit 13-A-191-P1

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height (feet from ground): 70 Stack Opening, (inches, dia.): 30 Exhaust Flow Rate (scfm): 17,500 Exhaust Temperature (°F): Ambient Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 13-A-191-P1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

#### **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🔀
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🔀
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🛛 No 🗌
A .1. '. C. D. '	

Authority for Requirement: 567 IAC 22.108(3)

#### **CAM Plan for CE 076 Baghouse**

See Section IV Compliance Assurance Monitoring (CAM)

## **Emission Point ID Number: EP 082 and EP 083**

## **Associated Equipment**

Associated Emission Unit ID Number: See Table: PUCB Line Emissions Control Equipment ID Number: See Table: PUCB Line Emissions Control Equipment Description: See Table: PUCB Line

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## **Table: PUCB Line**

Emission Point Number	Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity	Control Equipment	Construction Permit #
082	P-082	Phenolic Urethane	DMEA	Sand: 30,600 tons/hr Resin: 459 lb/hr Catalyst: 220 gallons	CE 082: Packed Bed Scrubbers	95-A-002-P6
083		Cold Box Core Making Line	king Sand/Resin	Sand: 60,000 tons/hr Resin: 900 lb/hr Catalyst: 220 gallons	CE 083: Packed Bed Scrubbers	13-A-192-P2

# **Applicable Requirements**

## Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

#### **BACT Emission Limits**

Emission Point Number	Emission Unit Number	Particulate Matter (PM)	PM <sub>10</sub>	PM <sub>2.5</sub>	Opacity	Volatile Organic Compounds
082	P-082	0.6 lb/hr	0.2 lb/hr	0.10 lb/hr	0%	99% Reduction or 1 ppmv
		0.003 gr/scf	0.001 gr/scf	0.0005 gr/scf		250 TPY <sup>(1)</sup>
083		0.6 lb/hr	0.2 lb/hr	0.10 lb/hr	0%	99% Reduction or 1 ppmv
		0.004 gr/scf	0.001 gr/scf	0.0006 gr/scf	. 370	250 TPY <sup>(1)</sup>

Standard includes fugitive emissions, and is established for the core making processes (EU P-082, EP-83 and EU P-91). See Operating Limits section for details. Note: This does not include VOC emissions due to natural gas combustion in the core ovens.

Authority for Requirement: DNR Construction Permit See Table: PUCB Line

#### **Other Emission Limits**

Pollutant: Opacity Emission Limit: 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit See Table: PUCB Line

(1) An exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM)

Emission Limit: 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

DNR Construction Permit See Table: PUCB Line

Pollutant: Single HAP

Emission Limit: 99% Reduction or 1 ppmv<sup>(2)</sup> Authority for Requirement: 567 IAC 23.1(4)"de"

DNR Construction Permit See Table: PUCB Line

<sup>(2)</sup> Applies only if the facility starts using triethylamine (TEA) in the core making process.

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Operating limits for this emission unit shall be:

- 1. The exhaust from the phenolic urethane cold box (PUCB) core making operation shall be connected to a scrubber(s) to control catalyst emissions whenever in operation.
- 2. Total VOC emissions from all core making operations at this facility shall not exceed 250.0 tons per daily rolling 365-day period. All VOC-containing materials used in the core making operations shall be included in the emissions calculations.
- 3. The scrubber flowrate for scrubber, CE082, shall be maintained at or above the minimum flowrate of 200 gallons per minute.
- 4. The scrubbant pH for CE082 shall not exceed 4.5 at any time.
- 5. The pressure drop differential for scrubber CE082, shall be maintained within a range of 0.1 to 6 inches of water
- 6. An alarm shall be installed which will alert the operator should any of the required pressure drop differentials, liquid flowrate, or pH level limits for the scrubber go out of compliance.
- 7. The owner or operator will take actions to make the PUCB line more efficient and minimize emissions, these include:
  - a. The facility shall maximize the use of the enclosed core machines, (Fritz Hansberg H350 LA51, Fritz Hansberg H350 LA52 and/or Laempe LFB25's) in preference to the other core machines in the line to the extent practicable.
  - b. The facility shall implement a continual process improvement program to minimize VOC and CO emissions. This program shall include methods for evaluating materials that will minimize the amount of VOC in the core making process and reduce the amount of VOC used.

### Reporting and Record Keeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- 1. The owner or operator shall maintain the following daily records:
  - a. The identification of each VOC-containing material used in the core making operations.
  - b. The VOC emission factors used for each material used in the core making operations.
  - c. The amount of each VOC-containing material used in the core making operations. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.
- 2. The owner or operator shall maintain the following monthly records:
  - a. The identification of each VOC-containing material used in the core making operations.
  - b. The VOC emission factors used for each material used in the core making operations.
  - c. The amount of each VOC-containing material used in the core making operations. For the purposes of calculating emissions, all VOC or HAP may be considered emitted on the day the materials are delivered to the facility or to the production line.
  - d. The amount of VOC emissions from the core making operations, in tons.
  - e. The 12-month rolling total of the amount of VOC emissions from the core making operations, in tons.
- 3. If the 12-month rolling total of the VOC emissions exceeds 200.0 tons, the owner or operator shall immediately begin keeping the following daily records:
  - a. The amount of VOC emissions from the core making operations, in tons.
  - b. The 365-day rolling total of the amount of VOC emissions from the core making operations, in tons.
  - c. Daily calculations for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from the core making operations drops below 200.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculation of VOC emissions will cease per Operating Limit condition 3 above. If the emissions once again exceed 200.0 tons, daily recordkeeping will be required per Operating Limit condition 3 above.
- 4. The owner or operator may take credit for any waste catalyst VOC shipped off-site. The owner or operator shall record the amount of the waste shipped off-site with each shipment, and analyze the catalyst content of the waste for each shipment. The sample analyzed shall be taken as a representative sample (as defined in 40 CFR §260.10) of the waste sent off-site for that shipment. The credit (calculated from the most current analysis and the amount shipped off-site) may be subtracted from the VOC rolling totals as of the date the waste is shipped off-site.
- 5. Retain Material Safety Data Sheets (MSDS) for all VOC containing materials used in the core making operations.
- 6. Record the amount of catalyst used in all PUCB core making operations, in pounds. Calculate and record monthly and 12 month rolling totals.
- 7. Maintain records of any maintenance performed on the scrubber.
- 8. Record the amount of catalyst recovered from the scrubber and shipped off-site on a rolling 12-month basis.
- 9. The owner or operator shall properly operate and maintain equipment to continuously monitor the scrubbant flowrate for each scrubber and trigger an operator alarm whenever the flowrate is below the minimum specified flowrate. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan.

- This requirement shall not apply on the days the equipment the scrubber controls is not in operation. The owner or operator shall record each time the alarm is triggered, and the time and methods taken to get the control equipment back into proper operations.
- 10. The owner or operator shall properly operate and maintain equipment to periodically monitor the scrubbant pH for each scrubber and trigger an operator alarm whenever the pH is above the maximum specified pH. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan. This requirement shall not apply on the days the equipment the scrubber controls is not in operation. The owner or operator shall record each time the alarm is triggered, and the time and methods taken to get the control equipment back into proper operations.
- 11. The owner or operator shall properly operate and maintain equipment to continuously monitor the scrubber pressure drop differential for each scrubber and trigger an operator alarm whenever the pressure drop differential is outside the maximum specified pressure differential range. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals or per written facility specific operation and maintenance plan. This requirement shall not apply on the days the equipment the scrubber controls is not in operation. The owner or operator shall record each time the alarm is triggered, and the time and methods taken to get the control equipment back into proper operations.
- 12. The facility shall maintain all records regarding the continual process improvement program for the PUCB core making line.

Authority for Requirement: DNR Construction Permit See Table: PUCB Line

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Emission	Emission	Stack Height	Stack	Exhaust	Exhaust	Discharge Style
Point	Unit	(feet from	Opening	Flow Rate	Temp.	
Number	Number	ground)	(inches, dia)	(scfm)	(°F)	
082	D 002	60	42	19,600	Ambient	Vertical Unobstructed
083	P-082	60	48	25,000	Ambient	Vertical Unobstructed

Authority for Requirement: DNR Construction Permit See Table: PUCB Line

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

## **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

 Agency Approved Operation & Maintenance Plan Required?
 Yes □ No ⋈

 Facility Maintained Operation & Maintenance Plan Required?
 Yes □ No ⋈

 Compliance Assurance Monitoring (CAM) Plan Required?
 Yes ⋈ No □

Authority for Requirement: 567 IAC 22.108(3)

## CAM Plan for CE 082 and CE 083 Scrubbers

See Section IV Compliance Assurance Monitoring (CAM)

# Clean

**Emission Point ID Number: IIBH1E** 

Associated Equipment

Emissions Control Equipment ID Number: CE IIBH1E

Emissions Control Equipment Description: Tumblast Baghouse

Emission Unit vented through this Emission Point: 855TB Emission Unit Description: 855 Tumblast (Machines 5 & 6)

Raw Material/Fuel: Metal

Rated Capacity: 4 cycles/hr per machine

Note: At the time of the Title V permit issuance, construction has not yet been completed on the physical changes described in DNR Construction Permit 77-A-120-S9. The facility is still considered in compliance with Construction Permit Condition 10A. Construction must be completed by 04/30/2024.

## **Applicable Requirements**

## Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 77-A-120-S9

(1) An exceedance of the indicator opacity of "no visible emissions" will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM<sub>10</sub>

Emission Limit(s): 1.0 lb/hr

Authority for Requirement: DNR Construction Permit 77-A-120-S9

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

DNR Construction Permit 77-A-120-S9

### Operational Requirements with Associated Monitoring and Recordkeeping

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- 1. The owner or operator shall install and continuously operate a bag leak detection system according to the following requirements:
  - a. The bag leak detection system sensor must provide output of relative particulate matter loadings and the owner or operator shall continuously record the output from the bag leak detection system using electronic or other means
  - b. The system must be equipped with an alarm that will be triggered when an increase in relative particulate loadings is detected over the alarm notification set point established in the site-specific monitoring plan, with the alarm notification sent to the appropriate plant personnel.
  - c. Initial adjustment of the system to establish a baseline output shall be determined within an initial setup period that is sufficient to capture fluctuations in the normal baseline as well as capturing cleaning signal spikes. A dye leak test (ultraviolet or equivalent) shall be used prior to and following the conclusion of the setup period to demonstrate no control system leakage during the monitoring system setup period.
  - d. Following the initial setup, the owner or operator shall not adjust the sensitivity, range, averaging period, alarm set point, or alarm delay time without following the procedures outlined in Construction Permit Condition c above.
- 2. The owner or operator shall develop a site-specific bag leak detection system monitoring plan, including operation and maintenance procedures, consistent with the recommendations contained in the U.S. Environmental Protection Agency guidance document "Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015) and comparable bag leak detection industry quality control standards. The owner or operator shall operate and maintain the bag leak detection system according to the site-specific monitoring plan at all times.
- 3. The owner or operator shall develop an operating and maintenance plan for the baghouse. The plan shall include a preventative maintenance schedule for routine and long-term maintenance consistent with good air pollution control practice and comparable baghouse industry quality control standards. The owner or operator shall operate and maintain the baghouse according to the plan at all times.
- 4. The owner or operator shall develop a corrective action plan for the baghouse. The plan must include the requirement that, in the event a bag leak detection system alarm notification is triggered, the facility shall determine the cause of the alarm notification, initiate corrective action to correct the cause of the alarm notification, and complete corrective action(s) as prescribed in the plan.
- 5. The owner or operator shall maintain a record of all bag leak detection alarm notifications, baghouse inspections and maintenance, and any actions resulting from bag leak detection alarm notification occurrences, inspections, and maintenance of the baghouse.
- 6. The owner or operator shall send the initial site-specific monitoring plan for the bag leak detection system, and any updates to the inspection or quality control standard section within the plan, to the Department for review.

ZLP 85 02-TV-012R3, 03/24/23

- 7. The owner or operator shall calculate the annual emissions of PM, PM<sub>10</sub>, and PM<sub>2.5</sub> in tons per year on a calendar basis, for a period of five years following resumption of regular operations and maintain a record of regular operations after the change, as required in IAC 567-33.3(18)"f"(4). This information shall be retained by the owner or operator for a period of ten years after project 17-199 is completed. This record of regular operations after the change shall be a documentation of emissions from all emission units named in project 17-199 as part of the Phase 1 and Phase 2 projects for complying with the new OSHA requirements for silica exposure. "Resumption of regular operations" shall be defined for project 17-199 as having completed all allowed construction associated with the Phase 1 and Phase 2 projects for complying with the new OSHA requirements for silica exposure.
- 8. The owner or operator shall submit a report to the Department if the annual emissions, in tons per year, from the units named in project 17-199 as part of the Phase 1 and Phase 2 projects for complying with the new OSHA requirements for silica exposure, exceed the baseline actual emissions by an amount that is "significant" as defined in IAC 567-33.3(1) for that pollutant. The baseline actual emissions are set at 46.55 tons for PM and PM<sub>10</sub> and 46.50 tons for PM<sub>2.5</sub>

Authority for Requirement: DNR Construction Permit 77-A-120-S9

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Emission Point Number	Emission Unit Number	Stack Height, (ft, from ground)	Stack Opening (inches, dia.)	Exhaust Flowrate (scfm)	Exhaust Temp. (°F)	Discharge Style
IIBH1E	855TB	80.5	47	35,450	Ambient	Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 77-A-120-S9

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

# Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes No 🖂

Compliance Assurance Monitoring (CAM) Plan Required?

Yes No

Authority for Requirement: 567 IAC 22.108(3)

## **CAM Plan for CE IIBH1E**

See Section IV Compliance Assurance Monitoring (CAM)

# **Emission Point ID Number: EP 804CR (Internally vented)**

## Associated Equipment

Associated Emission Unit ID Numbers: EU 804BC1, 804BC2, 804SBB1, 804SBB2, 804SBB3,

804SBB4

Emissions Control Equipment ID Number: CE 804CR

Emissions Control Equipment Description: 804 Cleaning Room Baghouse

## **Emission Unit Description**

## Table: 804CR

Emission Unit Description	Raw Material/Fuel	Rated capacity
804 Blast Cabinet 1 (EU 804BC1)		88 carries per hour
804 Blast Cabinet 2 (EU 804BC2)		
804 Spot Blast Booth 1 (EU 804sbb1)	M-4-1	30 carries per hour
804 Spot Blast Booth 2 (EU 804sbb2)	Metal	
804 Spot Blast Booth 3 (EU 804sbb3)		
804 Spot Blast Booth 4 (EU 804sbb4)		

<u>Note</u>: At the time of the Title V permit issuance, construction has not yet been completed on the physical changes described in DNR Construction Permit 11-A-597-S2. The facility is still considered in compliance with Construction Permit Condition 10A. Construction must be completed by 04/30/2024.

# **Applicable Requirements**

# Emission Limits For Internally Vented Sources (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from the emission points identified in Table 804CR shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit: 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 11-A-597-S2

(1) If visible emissions are observed the owner/operator is required to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM<sub>10</sub>

Emission Limit: 0.4 lb/hr

Authority for Requirement: DNR Construction Permit 11-A-597-S2

Pollutant: Particulate Matter (PM) Emission Limit: 3.90 lb/hr, 0.05 gr/dscf Authority for Requirement: 567 IAC 23.4(6)

DNR Construction Permit 11-A-597-S2

### Operational Requirements with Associated Monitoring and Recordkeeping

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- 1. The owner or operator shall install and continuously operate a bag leak detection system according to the following requirements:
  - a. The bag leak detection system sensor must provide output of relative particulate matter loadings and the owner or operator shall continuously record the output from the bag leak detection system using electronic or other means
  - b. The system must be equipped with an alarm that will be triggered when an increase in relative particulate loadings is detected over the alarm notification set point established in the site-specific monitoring plan, with the alarm notification sent to the appropriate plant personnel.
  - c. Initial adjustment of the system to establish a baseline output shall be determined within an initial setup period that is sufficient to capture fluctuations in the normal baseline as well as capturing cleaning signal spikes. A dye leak test (ultraviolet or equivalent) shall be used prior to and following the conclusion of the setup period to demonstrate no control system leakage during the monitoring system setup period.
  - d. Following the initial setup, the owner or operator shall not adjust the sensitivity, range, averaging period, alarm set point, or alarm delay time without following the procedures outlined in Construction Permit Condition c above.
- 2. The owner or operator shall develop a site-specific bag leak detection system monitoring plan, including operation and maintenance procedures, consistent with the recommendations contained in the U.S. Environmental Protection Agency guidance document "Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015) and comparable bag leak detection industry quality control standards. The owner or operator shall operate and maintain the bag leak detection system according to the site-specific monitoring plan at all times.
- 3. The owner or operator shall develop an operating and maintenance plan for the baghouse. The plan shall include a preventative maintenance schedule for routine and long-term maintenance consistent with good air pollution control practice and comparable baghouse industry quality control standards. The owner or operator shall operate and maintain the baghouse according to the plan at all times.
- 4. The owner or operator shall develop a corrective action plan for the baghouse. The plan must include the requirement that, in the event a bag leak detection system alarm notification is triggered, the facility shall determine the cause of the alarm notification, initiate corrective action to correct the cause of the alarm notification, and complete corrective action(s) as prescribed in the plan.
- 5. The owner or operator shall maintain a record of all bag leak detection alarm notifications, baghouse inspections and maintenance, and any actions resulting from bag leak detection alarm notification occurrences, inspections, and maintenance of the baghouse.
- 6. The owner or operator shall send the initial site-specific monitoring plan for the bag leak detection system, and any updates to the inspection or quality control standard section within the plan, to the Department for review.
- 7. The owner or operator shall calculate the annual emissions of PM, PM<sub>10</sub>, and PM<sub>2.5</sub> in tons

- per year on a calendar year basis, for a period of five years following resumption of regular operations and maintain a record of regular operations after the change, as required in IAC 567-33.3(18)"f"(4). This information shall be retained by the owner or operator for a period of ten years after project 15-316 is completed. This calculation shall include the emissions from all casting line sources at the facility (i.e. the 801, 802 and 804 casting line emission sources, and including EP 012, EP CLRBH4, EP 109 and EP 023). "Regular operations" shall be defined for project 15-316 as having completed all allowed construction.
- 8. The owner or operator shall submit a report to the department if the annual emissions, in tons per year, from project 15-316 exceed the baseline actual emissions by an amount that is "significant" as defined in IAC 567-33.3(1) for that pollutant. The baseline actual emissions are set at 87.9 tons per year for PM and PM<sub>10</sub>, and 87.5 tons per year for PM<sub>2.5</sub>.

Authority for Requirement: DNR Construction Permit 11-A-597-S2

## **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?

Yes □ No ☒

Facility Maintained Operation & Maintenance Plan Required?

Yes □ No ☒

Compliance Assurance Monitoring (CAM) Plan Required?

Yes ☒ No □

Authority for Requirement: 567 IAC 22.108(3)

#### **CAM Plan for CE 804CR Baghouse**

See Section IV Compliance Assurance Monitoring (CAM)

## **Emission Point ID Number: EP CLRBH-4**

## Associated Equipment

Associated Emission Unit ID Numbers: EU P-009, P-010, P-011A, P-017

Emissions Control Equipment ID Number: CE CLRBH-4

Emissions Control Equipment Description: Blast Cabinet Baghouse

## **Emission Unit Description**

**Table: CLRBH-4** 

EU ID	Description	Raw Material/Fuel	Maximum Rated Capacity
P-009	D853 Primary Blast Cabinet		
P-010	D850 Reblast and Core Knockout	Metal	82 units/hr
F-010	Cabinet	Metai	62 umts/m
P-011A	850 Spotblast		
P-017	853 Primary Blast Cabinet		72 units/hr

Note: At the time of the Title V permit issuance, construction has not yet been completed on the physical changes described in DNR Construction Permit 09-A-325-S2. The facility is still considered in compliance with Construction Permit Condition 10A. Construction must be completed by 04/30/2024.

# **Applicable Requirements**

#### Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below

Pollutant: Opacity Emission Limit: 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permit 09-A-325-S2

(1) If visible emissions are observed the owner/operator is required to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM<sub>10</sub>

Emission Limit: 12.4 lb/hr

Authority for Requirement: DNR Construction Permit 09-A-325-S2

Pollutant: Particulate Matter (PM) Emission Limit: 14.7 lb/hr, 0.05 gr/dscf Authority for Requirement: 567 IAC 23.4(6)

DNR Construction Permit 09-A-325-S2

### Operating Requirements with Associated Monitoring and Recordkeeping

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- 1. The owner or operator shall install and continuously operate a bag leak detection system according to the following requirements:
  - a. The bag leak detection system sensor must provide output of relative particulate matter loadings and the owner or operator shall continuously record the output from the bag leak detection system using electronic or other means
  - b. The system must be equipped with an alarm that will be triggered when an increase in relative particulate loadings is detected over the alarm notification set point established in the site-specific monitoring plan, with the alarm notification sent to the appropriate plant personnel.
  - c. Initial adjustment of the system to establish a baseline output shall be determined within an initial setup period that is sufficient to capture fluctuations in the normal baseline as well as capturing cleaning signal spikes. A dye leak test (ultraviolet or equivalent) shall be used prior to and following the conclusion of the setup period to demonstrate no control system leakage during the monitoring system setup period.
  - d. Following the initial setup, the owner or operator shall not adjust the sensitivity, range, averaging period, alarm set point, or alarm delay time without following the procedures outlined in Condition c above.
- 2. The owner or operator shall develop a site-specific bag leak detection system monitoring plan, including operation and maintenance procedures, consistent with the recommendations contained in the U.S. Environmental Protection Agency guidance document "Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015) and comparable bag leak detection industry quality control standards. The owner or operator shall operate and maintain the bag leak detection system according to the site-specific monitoring plan at all times.
- 3. The owner or operator shall develop an operating and maintenance plan for the baghouse. The plan shall include a preventative maintenance schedule for routine and long-term maintenance consistent with good air pollution control practice and comparable baghouse industry quality control standards. The owner or operator shall operate and maintain the baghouse according to the plan at all times.
- 4. The owner or operator shall develop a corrective action plan for the baghouse. The plan must include the requirement that, in the event a bag leak detection system alarm notification is triggered, the facility shall determine the cause of the alarm notification, initiate corrective action to correct the cause of the alarm notification, and complete corrective action(s) as prescribed in the plan.
- 5. The owner or operator shall maintain a record of all bag leak detection alarm notifications, baghouse inspections and maintenance, and any actions resulting from bag leak detection alarm notification occurrences, inspections, and maintenance of the baghouse.
- 6. The owner or operator shall send the initial site-specific monitoring plan for the bag leak detection system, and any updates to the inspection or quality control standard section within the plan, to the Department for review.

Authority for Requirement: DNR Construction Permit 09-A-325-S2

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height (feet from ground): 80.2 Stack Opening, (inches, dia.): 104 Exhaust Flow Rate (scfm): 222,410 Exhaust Temperature (°F): 100

Discharge Style: Vertical Unobstructed

Authority for Requirement: DNR Construction Permit 09-A-325-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

## **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes No No
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes No

Authority for Requirement: 567 IAC 22.108(3)

## **CAM Plan for CE CLRBH-4 Baghouse**

See Section IV Compliance Assurance Monitoring (CAM)

# **Jobbing Floor**

**Emission Point ID Number: EP 091 (Internally vented)** 

Associated Equipment

Associated Emission Unit ID Number: P-091

Emission Unit vented through this Emission Point: P-091

Emission Unit Description: Mold Line-Phenolic Urethane No-Bake Core Making

Raw Material/Fuel: Sand Rated Capacity: 33 ton/hr

## **Applicable Requirements**

# Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

#### **BACT Emission Limits**

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit: 250 tons/yr (1)

Authority for Requirement: DNR Construction Permit 95-A-005-P4

(1) Standard includes fugitive emissions, and is established for the core making processes permitted under permits 95-A-002-P4, 95-A-005-P4 and 13-A-192-P. Note: This does not include VOC emissions due to natural gas combustion in the core ovens.

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Operating limits for this emission unit shall be:

- 1. Total VOC emissions from all core making operations at this facility shall not exceed 250.0 tons per daily rolling 365-day period. All VOC-containing materials used in the core making operations shall be included in the emissions calculations.
- 2. The owner or operator will take actions to make the line more efficient and minimize emissions, these include:
  - a. The facility shall implement a continual process improvement program to minimize VOC and CO emissions. This program shall include methods for evaluating materials that will minimize the amount of VOC in the core making process and reduce the amount of VOC used.

### Reporting and Record Keeping

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. These records shall show the following:

- 1. The owner or operator shall maintain the following daily records:
  - a. The identification of each VOC-containing material used in the core making operations.
  - b. The VOC emission factors used for each material used in the core making operations.
  - c. The amount of each VOC-containing material used in the core making operations. For the purposes of calculating emissions, all VOC may be considered emitted on the day the materials are delivered to the facility or to the production line.
- 2. The owner or operator shall maintain the following monthly records:
  - a. The identification of each VOC-containing material used in the core making operations.
  - b. The VOC emission factors used for each material used in the core making operations.
  - c. The amount of each VOC-containing material used in the core making operations. For the purposes of calculating emissions, all VOC or HAP may be considered emitted on the day the materials are delivered to the facility or to the production line.
  - d. The amount of VOC emissions from the core making operations, in tons.
  - e. The 12-month rolling total of the amount of VOC emissions from the core making operations, in tons.
- 3. If the 12-month rolling total of the VOC emissions exceeds 200.0 tons, the owner or operator shall immediately begin keeping the following daily records:
  - a. The amount of VOC emissions from the core making operations, in tons.
  - b. The 365-day rolling total of the amount of VOC emissions from the core making operations, in tons.
  - Daily calculations for VOC emissions shall continue until the 365-day rolling total of the amount of VOC emissions from the core making operations drops below 200.0 tons for the remainder of the current calendar month plus one additional calendar month. At that time, rolling daily calculation of VOC emissions will cease per Section 15.C of this permit. If the emissions once again exceed 200.0 tons, daily recordkeeping will be required per Section 15.C of this permit.
- 4. The owner or operator may take credit for any waste VOC shipped off-site. The owner or operator shall record the amount of the waste shipped off-site each day, and analyze the VOC content of the waste once every calendar quarter. The sample analyzed shall be taken as a representative sample (as defined in 40 CFR §260.10) of the waste sent off-site for that quarter and shall be used as representative until the subsequent quarter's analysis is received. The credit (calculated from the most current analysis and the amount shipped off-site) may be subtracted from the VOC rolling totals as of the date the waste is shipped off-site.
- 5. Retain Material Safety Data Sheets (MSDS) for all VOC containing materials used in the core making operations.
- 6. The facility shall maintain all records regarding the continual process improvement program for the core making line.

Authority for Requirement: DNR Construction Permit 95-A-005-P4

<u>Monitoring Requirements</u> The owner/operator of this equipment shall comply with the monitoring	a requirements listed helow
The owner/operator of this equipment shall comply with the monitoring	g requirements tisted below
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)	

ZLP 96 02-TV-012R3, 03/24/23

# **Emission Point ID Number: EP 301** Associated Equipment Associated Emission Unit ID Number: P-301 Emission Unit vented through this Emission Point: P-301 Emission Unit Description: Jobbing Floor Pouring and Cooling Raw Material/Fuel: Sand Rated Capacity: 7.5 tons/hr **Applicable Requirements** Emission Limits For Internally Vented Sources (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.) The emissions from each emission point identified in Table Internally Vented & Fugitives shall not exceed the levels specified below. Pollutant: Opacity Emission Limits: 40 % Authority for Requirement: 567 IAC 23.3(2)"d" Pollutant: Particulate Matter (PM) Emission Limits: 0.1gr/dscf Authority for Requirement: 567 IAC 23.3(2)"a" Emission Limits For Fugitive Sources (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.) The emissions from each emission point identified in Table Internally Vented & Fugitives shall not exceed the levels specified below. Pollutant: Fugitive Dust Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. Authority for Requirement: 567 IAC 23.3(2)"c" **Monitoring Requirements** The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Compliance Assurance Monitoring (CAM) Plan Required?

Agency Approved Operation & Maintenance Plan Required?

Facility Maintained Operation & Maintenance Plan Required?

Yes 🗌 No 🖂

Yes No No

Yes No No

Authority for Requirement: 567 IAC 22.108(3)

## **Emission Point ID Number: IIBH3 and IIBH4W**

## **Associated Equipment**

**Table JFBH** 

	Emission Point Number	Control Equipment Description/ Number	Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity (ton/hr)	DNR Construction Permit
-			JFSO	Shakeout Pan			
	ПВН3	Baghouse CE IIBH3	JFSS	Manual Bunker Overband Magnet Tramp Metal Incline Conveyor Attrition MIll Vibratory Feeder to Didion 4' Diameter Didion Drum Magnetic Drum and Tramp Metal Tubs Bucket Elevator Surge Hopper Discharge Belt	Sand/Metal	24 tons/hr iron;7.5 tons/hr sand	77-A-122-S10
			JFSO	Shakeout Pan Manual Bunker			
	IIBH4W	Baghouse CE IIBH4W	JFSS	Overband Magnet Tramp Metal Incline Conveyor Attrition MIll Vibratory Feeder to Didion 4' Diameter Didion Drum Magnetic Drum and Tramp Metal Tubs Bucket Elevator Surge Hopper Discharge Belt	Sand/Metal	24 tons/hr iron; 7.5 tons/hr sand	77-A-123-S10

Note: At the time of the Title V permit issuance, construction has not yet been completed on the physical changes described in DNR Construction Permits 77-A-122-S10 and 77-A-123-S10. The facility is still considered in compliance with Construction Permit Condition 10A. Construction must be completed by 04/30/2024.

## **Applicable Requirements**

## Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d"

DNR Construction Permits in Table JFBH

(1) An exceedance of the indicator opacity of "no visible emissions" will require the owner or operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the Department may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM<sub>10</sub>

Emission Limit(s): 1.0 lb/hr

Authority for Requirement: DNR Construction Permits in Table JFBH

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.05 gr/dscf

Authority for Requirement: 567 IAC 23.4(6)

DNR Construction Permits in Table JFBH

## Operational Requirements with Associated Monitoring and Recordkeeping

The owner/operator of this equipment shall comply with the operational limits and requirements listed helow.

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner. The operating requirements and associated recordkeeping for this permit shall be:

- 1. The owner or operator shall install and continuously operate a bag leak detection system according to the following requirements:
  - a. The bag leak detection system sensor must provide output of relative particulate matter loadings and the owner or operator shall continuously record the output from the bag leak detection system using electronic or other means
  - b. The system must be equipped with an alarm that will be triggered when an increase in relative particulate loadings is detected over the alarm notification set point established in the site-specific monitoring plan, with the alarm notification sent to the appropriate plant personnel.
  - c. Initial adjustment of the system to establish a baseline output shall be determined within an initial setup period that is sufficient to capture fluctuations in the normal baseline as well as capturing cleaning signal spikes. A dye leak test (ultraviolet or equivalent) shall be used prior to and following the conclusion of the setup period to demonstrate no control system leakage during the monitoring system setup period.
  - d. Following the initial setup, the owner or operator shall not adjust the sensitivity, range, averaging period, alarm set point, or alarm delay time without following the procedures outlined in Construction Permit Condition c above.

- 2. The owner or operator shall develop a site-specific bag leak detection system monitoring plan, including operation and maintenance procedures, consistent with the recommendations contained in the U.S. Environmental Protection Agency guidance document "Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015) and comparable bag leak detection industry quality control standards. The owner or operator shall operate and maintain the bag leak detection system according to the site-specific monitoring plan at all times.
- 3. The owner or operator shall develop an operating and maintenance plan for the baghouse. The plan shall include a preventative maintenance schedule for routine and long-term maintenance consistent with good air pollution control practice and comparable baghouse industry quality control standards. The owner or operator shall operate and maintain the baghouse according to the plan at all times.
- 4. The owner or operator shall develop a corrective action plan for the baghouse. The plan must include the requirement that, in the event a bag leak detection system alarm notification is triggered, the facility shall determine the cause of the alarm notification, initiate corrective action to correct the cause of the alarm notification, and complete corrective action(s) as prescribed in the plan.
- 5. The owner or operator shall maintain a record of all bag leak detection alarm notifications, baghouse inspections and maintenance, and any actions resulting from bag leak detection alarm notification occurrences, inspections, and maintenance of the baghouse.
- 6. The owner or operator shall send the initial site-specific monitoring plan for the bag leak detection system, and any updates to the inspection or quality control standard section within the plan, to the Department for review.
- 7. The owner or operator shall calculate the annual emissions of PM, PM<sub>10</sub>, and PM<sub>2.5</sub> in tons per year on a calendar basis, for a period of five years following resumption of regular operations and maintain a record of regular operations after the change, as required in IAC 567-33.3(18)"f"(4). This information shall be retained by the owner or operator for a period of ten years after project 17-199 is completed. This record of regular operations after the change shall be a documentation of emissions from all emission units named in project 17-199 as part of the Phase 1 and Phase 2 projects for complying with the new OSHA requirements for silica exposure. "Resumption of regular operations" shall be defined for project 17-199 as having completed all allowed construction associated with the Phase 1 and Phase 2 projects for complying with the new OSHA requirements for silica exposure.
- 8. The owner or operator shall submit a report to the Department if the annual emissions, in tons per year, from the units named in project 17-199 as part of the Phase 1 and Phase 2 projects for complying with the new OSHA requirements for silica exposure, exceed the baseline actual emissions by an amount that is "significant" as defined in IAC 567-33.3(1) for that pollutant. The baseline actual emissions are set at 46.55 tons for PM and PM<sub>10</sub> and 46.50 tons for PM<sub>2.5</sub>

Authority for Requirement: DNR Construction Permits in Table JFBH

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Emission Point Number	Emission Unit Number	Stack Height, (ft, from ground)	Stack Opening (inches, dia.)	Exhaust Flowrate (scfm)	Exhaust Temp. (°F)	Discharge Style
IIBH3	JFSO & JFSS	80.5	47	35,500	Ambient <sup>(1)</sup>	Vertical Unobstructed
IIBH4W	JFSO & JFSS	80.5	47	35,500	Ambient <sup>(1)</sup>	Vertical Unobstructed

<sup>(1)</sup> Ambient conditions may be supplemented during colder periods of the year.

Authority for Requirement: DNR Construction Permits in Table JFBH

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

## **Monitoring Requirements**

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🛛 No 🗌

Authority for Requirement: 567 IAC 22.108(3)

#### CAM Plan for CE IIBH3 and IIBH4W

See Section IV Compliance Assurance Monitoring (CAM)

ZLP 101 02-TV-012R3, 03/24/23

# IV. Compliance Assurance Monitoring (CAM)

Facility Name: John Deere Foundry Waterloo

Permit Number: 02-TV-012R3

# **CAM Plan for Baghouse-Controlled Sources**

# **Table CAM-BH1**

Emission Point Number	Emission Unit Number(s)	Emission Unit Description	Control Equipment Number	Type of Bag Leak Detection System <sup>(1)</sup>	IDNR Construction Permit Number <sup>(2)</sup>
AlloyBH	P-120B-IF	Alloy Addition System	AlloyBH	DynaCHARGE PM100 PRO	99-A-349
IFBH	P-003-IF P-004-IF			DynaCHARGE PM100 PRO	98-A-957-S5
IFBH2	P-001-IF P-002-IF	Induction Furnaces 1 & 2	IFBH	DynaCHARGE PM100 PRO	11-A-753-S1
249	P-031 P-034 802M 802 Sand Cooler	802 Sand System	802BH	DynaCHARGE PM100 PRO	97-A-138-S6
IIBH1E	855TB	855 Tumblast	IIBH1E	DynaCHARGE PM100 PRO	77-A-120-S9
IIBH2	808SB 804SH	808 Sand Belts 804 Sand Hopper	IIBH2	DynaCHARGE PM100 PRO	77-A-121- S11
IIBH3	JFSO,	Jobbing Floor Shakeout Pan	IIBH3	DynaCHARGE PM100 PRO	77-A-122- S10
IIBH4W	JFSS	Jobbing Floor Shakeout Separator	IIBH4W	DynaCHARGE PM100 PRO	77-A-123- S10
	804LB1		804BH	DynaCHARGE PM100 PRO	11-A-437-P4 11-A-438-P4
	804LB2				
804SS1	804PO				
001551	804POUR				
	804SC1				
	804SC2				
	804SO1	804 Sand System			
	804SO2				
	804MIX1				
804SS2	804MIX2				
	804MIX3				
	804CY1				
	804CY2				

075	P-075	Sand Handling System	075	DynaCHARGE PM100 PRO	13-A-190-P3
076	P-076	Sand Handling System	076	DynaCHARGE PM100 PRO	13-A-191-P1
804MT1	804MT1	804 Magnesium Treatment	804MTBH	DynaCHARGE PM100 PRO	11-A-606-S3
SDSABH	P-162	New Sand Delivery and Storage	162	DynaCHARGE PM100 PRO	72-A-040-S3
249	808RS	808 Reclaim Shed	248	DynaCHARGE	97-A-139-S4
248	808SS	808 Sand Supply		PM100 PRO	
	804BC1	Mold Line 804 Cleaning	804CR	DynaCHARGE PM100 PRO	11-A-597-S2
	804BC2				
804CR	804SBB1				
004CK	804SBB2	Wiold Line 804 Cleaning			
	804SBB3				
	804SBB4				
CLRBH-	P-009		CLRBH-4	DynaCHARGE PM100 PRO	09-A-325-S2
	P-010	Cleaning Cabinets			
	P-011A				
	P-017				
00.43.4	804M	804 Attrition Mill	804MBH DynaCHARGE PM100 PRO	DynaCHARGE	15 4 510 62
804M	804SP	804 Shaker Pan			17-A-718-S2

<sup>(1)</sup>DynaCHARGE PM100 Pro monitor is a triboelectric bag leak detection indicator. Pollutant Controlled: Opacity, Particulate Matter (PM), PM-10, and PM-2.5

#### Applicable Requirements

See DNR Construction Permits listed in Table CAM-BH1

## **Monitoring Approach**

The key elements of the monitoring approach for the sources controlled by baghouses equipped with bag leak detection systems, including the indicators to be monitored, indicator ranges, and performance criteria, are presented in Table CAM-BH2.

<sup>(2)</sup> At the time of the Title V permit issuance, construction has not yet been completed on the physical changes described in DNR Construction Permits referenced in Table CAM-BH1. The facility is still considered in compliance with Construction Permit Condition 10A. Construction must be completed by 04/30/2024.

Table CAM-BH2. Bag Leak Detection System Monitoring Approach

I.	Indicator	Bag leak detection system (triboelectric).
	A. Measurement Approach	Continuously monitor analog system output indicating the relative change in PM loadings on the probe (% of the system scale) in the clean
		side of each baghouse compartment when the controlled process is in operation.
II.	Indicator Range	An excursion is defined as a measured % of the system scale that exceeds the "alarm notification level" described in the site-specific bag leak detection monitoring plans (required by construction permits) for each baghouse. The "alarm notification level" is the only notification level requiring corrective action as opposed to other warning notification levels described in the site-specific bag leak detection monitoring plan. Excursions trigger an alarm and corrective action. The corrective action plan is included in the site-specific bag leak detection monitoring plan for each baghouse. An excursion does not necessarily indicate a deviation of violation of applicable permit terms, conditions, and/or requirements when the corrective action plan is executed appropriately (e.g. timeframe and actions).
III.	Performance Criteria	actions).
	A. Data Representativeness	Certified to detect particulate concentration levels of 1 mg/m <sup>3</sup> or less.
	B. Verification of Operational Status	Analog output data is stored for a minimum of five (5) years.
	C. QA/QC Practices	See Appendix A of the site specific bag leak detection monitoring plans for each baghouse.
	D. Monitoring Frequency Data Collection Procedure Averaging Period	Measured continuously. Data is stored in facility database each hour. NA

Authority for Requirement: 567 IAC 22.108(3)

## CAM Plan for CE 082 and CE 083

Background

**Emission Unit** 

Description: Phenolic Urethane Cold Box Core Making Line

Identification: P-082

Facility: John Deere Waterloo Foundry

Applicable Regulation, Emission Limits and Monitoring Requirements

Regulation No.: Construction Permits 13-A-192-P2 & 95-A-002-P6

Regulated pollutant (PSEU): VOC (amine catalyst)

Emission Limit: 99% catalyst reduction, or 1 ppmv catalyst

Monitoring Requirements: Continuously monitor scrubbing liquid flow rate, pH, and

differential pressure

Control Technology: Packed bed scrubbers

**Monitoring Approach** 

The key elements of the monitoring approach for VOC, including the indicators to be monitored, indicator ranges, and performance criteria, are presented in Tables A, B, and C.

**Table A. Flow Rate Monitoring Approach** 

I.	Indicator	Scrubbing liquid flow rate.
	Measurement Approach	The scrubbing liquid flow rate is monitored with
		an electromagnetic flow meter.
II.	Indicator Range	An excursion is defined as a scrubber water flow rate measured at a value of less than 200 gal/min for more than 15 minutes. Excursions trigger an inspection and corrective action. An excursion does not necessarily indicate a deviation of violation of applicable permit terms, conditions, and/or requirements when the corrective action plan is executed appropriately (e.g. timeframe and actions).
III.	Performance Criteria	
	A. Data Representativeness	The flow meter is installed in the scrubbing liquid inlet line. The accuracy is $\pm$ 0.5% of the measured value.
	B. Verification of Operational Status	In operation prior to CAM requirement.
	C. QA/QC Practices	Calibration as recommended by manufacturer
	D. Monitoring Frequency	Measured continuously.
	Data Collection Procedure	Recorded once per day.
	Averaging Period	NA

Table B. pH Monitoring Approach

	<u> </u>	
I.	Indicator	Scrubbing liquid pH.
	Measurement Approach	The scrubbing liquid pH is monitored with an
		electrode glass sensor pH meter.

II.	Indicator Range	An excursion is defined as a daily monitored
		scrubber water pH measured at a value above
		4.5. Excursions trigger an inspection and
		corrective action. An excursion does not
		necessarily indicate a deviation of violation of
		applicable permit terms, conditions, and/or
		requirements.
III.	Performance Criteria	
	A. Data Representativeness	The pH meter is installed submerged in the
		scrubbing liquid reservoir near the recirculation
		inlet.
	B. Verification of Operational Status	In operation prior to CAM requirement.
	C. QA/QC Practices	Calibration as recommended by manufacturer
	D. Monitoring Frequency	Measured continuously.
	Data Collection Procedure	Recorded daily.
	Averaging Period	NA

**Table C. Differential Pressure Monitoring Approach** 

ed bed pressure differential.
packed bed differential pressure is
tored with a magnetic diaphragm
rential pressure transmitter.
excursion is defined as a differential pressure sured at a value below 0.5 or above 5.5 es of water column. Excursions trigger an ection and corrective action. An excursion not necessarily indicate a deviation of tion of applicable permit terms, conditions, or requirements when the corrective action is executed appropriately (e.g. timeframe
actions).
,
differential pressure transmitter is installed e packed bed scrubber. The minimum racy is $\pm 1\%$ .
peration prior to CAM requirement.
oration as recommended by manufacturer
sured continuously.
orded once daily.

Authority for Requirement: 567 IAC 22.108(3)

## V. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

## **G1.** Duty to Comply

- 1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. 567 IAC 22.108(9)"a"
- 2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. 567 IAC 22.105 (2)"h"(3)
- 3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. 567 IAC 22.108 (1)"b"
- 4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. 567 IAC 22.108 (14)
- 5. It shall not be a defense for a 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 conditions of the permit. 567 IAC 22.108 (9)"b"
- 6. For applicable requirements with which the permittee is in compliance, the permittee shall continue to comply with such requirements. For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis. 567 IAC 22.108(15)"c"

#### **G2.** Permit Expiration

- 1. Except as provided in rule 567—22.104(455B), permit expiration terminates a source's right to operate unless a timely and complete application for renewal has been submitted in accordance with rule 567—22.105(455B). 567 IAC 22.116(2)
- 2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall submit on forms or electronic format specified by the Department to the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, Wallace State Office Building, 502 E 9th St., Des Moines, IA 50319-0034, two copies (three if your facility is located in Linn or Polk county) of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. An additional copy must also be sent to U.S. EPA Region VII, Attention: Chief of Air Permitting & Standards Branch, 11201 Renner Blvd., Lenexa, KS 66219. Additional copies to local programs or EPA are not required for application materials submitted through the electronic format specified by the Department. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 22.105(2). 567 IAC 22.105

## G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. 567 IAC 22.107 (4)

#### **G4.** Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. 567 IAC 22.108 (15)"e"

## **G5. Semi-Annual Monitoring Report**

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. 567 IAC 22.108 (5)

#### **G6.** Annual Fee

- 1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
- 2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
- 3. The emissions inventory shall be submitted annually by March 31 with forms specified by the department documenting actual emissions for the previous calendar year.
- 4. The fee shall be submitted annually by July 1 with forms specified by the department.
- 5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
- 6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
- 7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
- 8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

## G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

- 1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- 3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- 4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. 567 IAC 22.108 (15)"b"

#### **G8.** Duty to Provide Information

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. 567 IAC 22.108 (9)"e"

#### **G9.** General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

- 1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
- 2. Remedy any cause of excess emissions in an expeditious manner.
- 3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
- 4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. 567 IAC 24.2(1)

#### G10. Recordkeeping Requirements for Compliance Monitoring

- 1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:
  - a. The date, place and time of sampling or measurements
  - b. The date the analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses; and
  - f. The operating conditions as existing at the time of sampling or measurement.
  - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
- 2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.
- 3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
  - a. Comply with all terms and conditions of this permit specific to each alternative scenario.
  - b. Maintain a log at the permitted facility of the scenario under which it is operating.

c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. 567 IAC 22.108(4), 567 IAC 22.108(12)

### G11. Evidence used in establishing that a violation has or is occurring.

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

- 1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:
  - a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
  - b. Compliance test methods specified in 567 Chapter 25; or
  - c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.
- 2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a. Any monitoring or testing methods provided in these rules; or
  - b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. 567 IAC 21.5(1)-567 IAC 21.5(2)

# **G12.** Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. 567 IAC 22.108(6)

#### G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 725-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). 567 IAC Chapter 131-State Only

#### G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall

be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. A variance from this subrule may be available as provided for in Iowa Code section 455B.143. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

- 2. Excess Emissions Reporting
  - a. Initial Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An initial report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The initial report may be made by electronic mail (E-mail), in person, or by telephone and shall include as a minimum the following:
    - i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
    - ii. The estimated quantity of the excess emission.
    - iii. The time and expected duration of the excess emission.
    - iv. The cause of the excess emission.
    - v. The steps being taken to remedy the excess emission.
    - vi. The steps being taken to limit the excess emission in the interim period.
  - b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required initial reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:
    - i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
    - ii. The estimated quantity of the excess emission.
    - iii. The time and duration of the excess emission.
    - iv. The cause of the excess emission.
    - v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
    - vi. The steps that were taken to limit the excess emission.
    - vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. 567 IAC 24.1(1)-567 IAC 24.1(4)
- 3. Emergency Defense for Excess Emissions. For the purposes of this permit, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control

of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The facility at the time was being properly operated;
- c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
- d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice fulfills the requirement of paragraph 22.108(5)"b." See G15. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement. 567 IAC 22.108(16)

#### **G15. Permit Deviation Reporting Requirements**

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). 567 IAC 22.108(5)"b"

# **G16.** Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. 567 IAC 23.1(2), 567 IAC 23.1(4)

# G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

- 1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
  - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
  - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);

- c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
- d. The changes are not subject to any requirement under Title IV of the Act (revisions affecting Title IV permitting are addressed in rules 567—22.140(455B) through 567 22.144(455B));
- e. The changes comply with all applicable requirements.
- f. For each such change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:
  - i. A brief description of the change within the permitted facility,
  - ii. The date on which the change will occur,
  - iii. Any change in emission as a result of that change,
  - iv. The pollutants emitted subject to the emissions trade
  - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
  - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
  - vii. Any permit term or condition no longer applicable as a result of the change. 567 IAC 22.110(1)
- 2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. 567 IAC 22.110(2)
- 3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). 567 IAC 22.110(3)
- 4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. 567 IAC 22.110(4)
- 5. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. 567 IAC 22.108(11)

#### G18. Duty to Modify a Title V Permit

- 1. Administrative Amendment.
  - a. An administrative permit amendment is a permit revision that does any of the following:
    - i. Correct typographical errors
    - ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
    - iii. Require more frequent monitoring or reporting by the permittee; or

- iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.
- b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.
- c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.
- 2. Minor Title V Permit Modification.
  - a. Minor Title V permit modification procedures may be used only for those permit modifications that satisfy all of the following:
    - i. Do not violate any applicable requirement;
    - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit;
    - iii. Do not require or change a case by case determination of an emission limitation or other standard, or an increment analysis;
    - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act;
    - v. Are not modifications under any provision of Title I of the Act; and vi. Are not required to be processed as significant modification under rule 567 22.113(455B).
  - b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
    - i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
    - ii. The permittee's suggested draft permit;
    - iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
    - iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).
  - c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions

during this time period, the existing permit terms and conditions it seeks to modify may be enforced against the facility.

#### 3. Significant Title V Permit Modification.

Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, as those requirements that apply to Title V issuance and renewal.

The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. 567 IAC 22.111-567 IAC 22.113

#### **G19. Duty to Obtain Construction Permits**

Unless exempted in 567 IAC 22.1(2) or to meet the parameters established in 567 IAC 22.1(1)"c", the permittee shall not construct, install, reconstruct or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, or conditional permit, or permit pursuant to rule 567 IAC 22.8, or permits required pursuant to rules 567 IAC 22.4, 567 IAC 22.5, 567 IAC 31.3, and 567 IAC 33.3 as required in 567 IAC 22.1(1). A permit shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source or anaerobic lagoon. 567 IAC 22.1(1)

#### G20. Asbestos

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when activities involve asbestos mills, surfacing of roadways, manufacturing operations, fabricating, insulating, waste disposal, spraying applications, demolition and renovation operations (567 IAC 23.1(3)"a"); training fires and controlled burning of a demolished building (567 IAC 23.2).

## G21. Open Burning

The permittee is prohibited from conducting open burning, except as provided in 567 IAC 23.2. 567 IAC 23.2 except 23.2(3)"j"; 567 IAC 23.2(3)"j" - State Only

## G22. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. 567 IAC 22.108(7)

#### G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements

- 1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
  - c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
- 2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
  - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must

- comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
- e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
- f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
- 3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
- 5. The permittee shall be allowed to switch from any ozone-depleting or greenhouse gas generating substances to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. 40 CFR part 82

### **G24. Permit Reopenings**

- 1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. 567 IAC 22.108(9)"c"
- 2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.
  - a. Reopening and revision on this ground is <u>not</u> required if the permit has a remaining term of less than three years;
  - b. Reopening and revision on this ground is <u>not</u> required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to May 15, 2001.
  - c. Reopening and revision on this ground is <u>not</u> required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. 567 IAC 22.108(17)"a", 567 IAC 22.108(17)"b"
- 3. A permit shall be reopened and revised under any of the following circumstances:
  - a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to July 21, 1992, provided that the reopening may be stayed pending judicial review of that determination; b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions

standards or other terms or conditions of the Title V permit;

- c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.
- d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
- e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. 567 IAC 22.114(1)
- 4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. 567 IAC 22.114(2)
- 5. A notice of intent shall be provided to the Title V source at least 30 days in advance of the date the permit is to be reopened, except that the director may provide a shorter time period in the case of an emergency. 567 IAC 22.114(3)

#### **G25. Permit Shield**

- 1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
  - a. Such applicable requirements are included and are specifically identified in the permit; or
  - b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- 2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.
- 3. A permit shield shall not alter or affect the following:
  - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;
  - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act;
  - d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. 567 IAC 22.108 (18)

#### **G26.** Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. 567 IAC 22.108 (8)

#### **G27. Property Rights**

The permit does not convey any property rights of any sort, or any exclusive privilege. 567 IAC 22.108 (9)"d"

# **G28.** Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought consistent with the requirements of 567 IAC 22.111(1). 567 IAC 22.111 (1)"d"

#### G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. 567 IAC 22.3(3)"c"

G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with applicable requirements of 567 – Chapter 23 or a permit condition. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. If the owner or operator does not provide timely notice to the department, the department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with applicable rules or permit conditions. Upon written request, the department may allow a notification period of less than 30 days. At the department's request, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. A testing protocol shall be submitted to the department no later than 15 days before the owner or operator conducts the compliance demonstration. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator Iowa DNR, Air Quality Bureau Wallace State Office Building 502 E 9<sup>th</sup> St.
Des Moines, IA 50319-0034 (515) 725-9545

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program. 567 IAC 25.1(7)"a", 567 IAC 25.1(9)

#### G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. 567 IAC 26.1(1)

#### **G32.** Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Iowa Compliance Officer

Air Branch

Enforcement and Compliance Assurance Division

U.S. EPA Region 7

11201 Renner Blvd.

Lenexa, KS 66219

(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau

Iowa Department of Natural Resources

Wallace State Office Building

502 E 9<sup>th</sup> St.

Des Moines, IA 50319-0034

(515) 725-8200

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

#### Field Office 1

1101 Commercial Court, Suite 10 Manchester, IA 52057 (563) 927-2640

#### Field Office 3

1900 N. Grand Ave. Spencer, IA 51301 (712) 262-4177

#### Field Office 5

Wallace State Office Building 502 E 9<sup>th</sup> St. Des Moines, IA 50319-0034 (515) 725-0268

#### **Polk County Public Works Dept.**

Air Quality Division 5885 NE 14th St. Des Moines, IA 50313 (515) 286-3351

#### Field Office 2

2300-15th St., SW Mason City, IA 50401 (641) 424-4073

#### Field Office 4

1401 Sunnyside Lane Atlantic, IA 50022 (712) 243-1934

#### Field Office 6

1023 West Madison Street Washington, IA 52353-1623 (319) 653-2135

#### **Linn County Public Health**

Air Quality Branch 1020 6<sup>th</sup> Street SE Cedar Rapids, IA 52401 (319) 892-6000

# VI. Appendix A: NESHAP

1. Subpart EEEEE—National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries

http://www.ecfr.gov/cgi-bin/text-

idx?SID=f12aac25117bae39e8e9aa5751e382cc&node=sp40.14.63.eeeee&rgn=div6