

TITLE V MINOR MODIFICATION (with construction) APPLICATION REVIEW

Facility Name: TRW Warrenton Foundry

City: Warrenton

County: Warren

AIRS #: 04-13-301-00012

Application #: 18107

Date SIP Application Received: April 8, 2008

Date Title V Application Received: April 8, 2008

Permit No: 3321-301-0012-V-03-3

Program	Review Engineers	Review Managers
SSPP	Manny Patel	David Matos
SSCP	Dan McCain	DeAnna Oser
ISMP	Bob Shih	Douglas Waldron
TOXICS	Don Holder	Karen Hays

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the proposed permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the EPA review process will be described in an addendum to this narrative

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments and minor and significant modifications and 502(b)(10) changes. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
3321-301-0012-V-03-0	April 5, 2007	X	
3321-301-0012-V-03-1	October 4, 2007	X	
3321-301-0012-V-03-2	November 13, 2007	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
3321-301-0012-V-03-0	Title V Renewal
3321-301-0012-V-03-1	Installation of fourth furnace and incorporate Foundry MACT
3321-301-0012-V-03-2	Change initial testing requirement to 180 days to be consistent with MACT standards and correct typographical errors in Condition 4.2.3 and 4.2.5

B. Regulatory Status

1. PSD/NSR/RACT

TRW Warrenton Foundry is classified as one of the 28 named source categories in the PSD regulations because it is a secondary metal production facility. The foundry is a major source because it has the potential to emit more than 100 tons per year of at least one pollutant regulated by the PSD regulations

2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Yes			X
PM ₁₀	Yes			X
SO ₂	Yes			X
VOC	Yes	X		
NO _x	Yes			X
CO	Yes	X		

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
TRS	No			
H ₂ S	No			
Individual HAP	Yes			X
Total HAPs	Yes	X		

II. Proposed Modification

A. Description of Modification

TRW Warrenton Foundry is proposing to install bin vents (control codes 820A, 821A, 840A, 841A, 880, 881, 882 and 883) on the sand silos (source code 020, 021, 040 and 041) and day storage bins (source code 600, 601, 602 and 603). These sources are currently controlled by existing baghouses TRW is installing bin vents instead of using a baghouse to control emissions. TRW is also rerouting the shot blast units (source code 270 and 370) to existing finishing baghouse (Source Code 830).

TRW is also requesting to modify the condition 6.2.1 to remove specific reference to Isocure I and Isocure II which are vendor trademarks and to replace them with general terms PUCB Binders (polyurethane binders) that would allow the facility to use equivalent material from others vendors

B. Emissions Change

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	Yes	0	0
PM ₁₀	Yes	0	0
SO ₂	No		
VOC	No		
NO _x	No		
CO	No		
TRS	No		
H ₂ S	No		
Individual HAP	No		
Total HAPs	No		

C. PSD/NSR Applicability

The facility is a PSD major source hence any modification to the facility has to be evaluated for PSD applicability. All of these sources are currently controlled. The particulate removal efficiency of the bin vent is similar to the baghouse and hence no increase in emissions is expected as a result of these changes.

III. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable

B. Applicable Rules and Regulations

The facility is subject to 40 CFR Part 63, Subpart EEEEE “National Emission Standards for Hazardous Air Pollutants for Iron and Steel foundries”

C. Compliance Status

This facility is operating in compliance with its air quality permit.

D. Operational Flexibility

None applicable.

E. Permit Conditions

None applicable.

IV. Regulated Equipment Requirements

A. Brief Process Description

No Changes in the process at the foundry as a result of the proposed changes.

B. Equipment List for the Process

The following is the updated equipment list

Emission Units			Specific Limitations/Requirements		Air Pollution Control Devices		Stack ID
ID No.	Description	Process Group	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description	ID No.
020	Core Sand Bulk Storage Silo	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.4.1, 3.4.2	820A	Bin Vent Filter	920A
021	Core Sand Bulk Storage Silo	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.4.1, 3.4.2	821A	Bin Vent Filter	921A
040	New Sand Storage Silo	RAW	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.4.1, 3.4.2	840A	Bin Vent Filter	940A
041	New Sand Storage Silo	RAW	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.4.1, 3.4.2	841A	Bin Vent Filter	941A
045	New Sand Day Storage Silo	SAN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7	820	Sand Baghouse	920
051	Miscellaneous Bulk Materials Storage Silo	RAW	391-3-1-.02(2)(b), 391-3-1-.02(2)(e).	3.4.1, 3.4.2	851	Bin Vent Filter	951
052	Miscellaneous Bulk Materials Storage Silo	RAW	391-3-1-.02(2)(b), 391-3-1-.02(2)(e).	3.4.1, 3.4.2	852	Bin Vent Filter	952
053	Premix Storage Silo	RAW	391-3-1-.02(2)(b), 391-3-1-.02(2)(e).	3.4.1, 3.4.2	853	Bin Vent Filter	953
060	Miscellaneous Bulk Materials Storage Silo	RAW	391-3-1-.02(2)(b), 391-3-1-.02(2)(e).	3.4.1, 3.4.2	860	Bin Vent Filter	960
061	Miscellaneous Bulk Materials Storage Silo	RAW	391-3-1-.02(2)(b), 391-3-1-.02(2)(e).	3.4.1, 3.4.2	861	Bin Vent Filter	961
062	Premix Storage Silo	RAW	391-3-1-.02(2)(b), 391-3-1-.02(2)(e).	3.4.1, 3.4.2	862	Bin Vent Filter	962
063	Miscellaneous Bulk Materials Storage Silo	RAW	391-3-1-.02(2)(b), 391-3-1-.02(2)(e).	3.4.1, 3.4.2	863	Bin Vent Filter	963
064	Miscellaneous Bulk Materials Storage Silo	RAW	391-3-1-.02(2)(b), 391-3-1-.02(2)(e).	3.4.1, 3.4.2	864	Bin Vent Filter	964

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Emission Units			Specific Limitations/Requirements		Air Pollution Control Devices		Stack ID
ID No.	Description	Process Group	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description	ID No.
070	Railcar Unloading Dump Pit	RAW	391-3-1-.02(2)(b), 391-3-1-.02(2)(e).	3.4.1, 3.4.2	870	Bag Filter	970
071	Railcar Unloading Dump Pit	RAW	391-3-1-.02(2)(b), 391-3-1-.02(2)(e).	3.4.1, 3.4.2	870	Bag Filter	970
072	Pneumatic Conveying Equipment	RAW	391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.4.1, 3.4.2	870	Bag Filter	970
073	Pneumatic Conveying Equipment	CSA	391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.4.1, 3.4.2	871	Bag Filter	971
110	Vibrating Pan	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 5.2.1,5.2.5, 6.1.7	810	Main Baghouse	910
111	Coreless Induction Furnace	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e) 40CFR Part 63 Subpart EEEEE	2.2.1, 3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.5, 6.1.7, 6.2.4, 6.2.5	810	Main Baghouse	910
120	Vibrating Pan	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.5, 6.1.7	810	Main Baghouse	910
121	Coreless Induction Furnace	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e) 40CFR Part 63 Subpart EEEEE	2.2.1, 3.2.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.5, 6.1.7, 6.2.4, 6.2.5	810	Main Baghouse	910
130	Vibrating Pan	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.2, 3.3.3, 4.2.1, 5.2.1, 5.2.5, 6.1.7	810	Main Baghouse	910
131	Coreless Induction Furnace	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e) 40CFR Part 63 Subpart EEEEE	2.2.1, 3.2.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 6.1.7, 6.2.4, 6.2.5	810	Main Baghouse	910
200	Channel Pouring Furnace	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e) 40CFR Part 63 Subpart EEEEE	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 4.2.3, 5.2.1, 5.2.5, 6.1.7, 6.2.4, 6.2.5	840	Casting Cooling Baghouse	940
140	Vibrating Pan	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.2, 3.3.3, 4.2.1, 5.2.1, 5.2.5, 6.1.7	810	Main Baghouse	910
141	Coreless Induction Furnace	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e) 40CFR Part 63 Subpart EEEEE	2.2.1, 3.2.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.2, 5.2.5, 6.1.7, 6.2.4, 6.2.5	810	Main Baghouse	910

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Emission Units			Specific Limitations/Requirements		Air Pollution Control Devices		Stack ID
ID No.	Description	Process Group	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description	ID No.
201	Ladles	MPCS	391-3-1-.02(2)(e)	3.3.5, 3.4.1	N/A	None	N/A
210	Mold Machine	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.5, 6.1.7, 6.2.1	840	Casting Cooling Baghouse	940
220	Pouring	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e) 40CFR Part 63 Subpart EEEEE	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 4.2.3, 5.2.1, 5.2.5, 6.1.7	840	Casting Cooling Baghouse	940
230	In-Mold Cooling	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.2.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 4.2.3, 5.2.1, 5.2.5, 6.1.7	840	Casting Cooling Baghouse	940
240	Sand Shake- out	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.2.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 4.2.3, 5.2.1, 5.2.5, 6.1.7	840	Casting Cooling Baghouse	940
250	Casting Cooling	FIN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e),	2.2.1, 3.3.2, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.5, 6.1.7	830	Finish Baghouse	930
260	Desprue	FIN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.2, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.5, 6.1.7	830	Finish Baghouse	930
270	Shot Blast Machine	FIN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.2, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.5, 6.1.7	830	Finish Baghouse	930
280	Grinding Unit	FIN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.2, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.5, 6.1.7	830	Finish Baghouse	930
281	Grinding Unit	FIN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.2, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.5, 6.1.7	830	Finish Baghouse	930
282	Grinding Unit	FIN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.2, 3.4.1, 3.4.2, 4.2.1, 5.2.1,5.2.5, 6.1.7	830	Finish Baghouse	930
300	Channel Pouring Furnace	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 40CFR Part 63 Subpart EEEEE	2.2.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 4.2.3, 5.2.1, 5.2.5, 6.1.7	840	Casting Cooling Baghouse	940
310	Mold Machine	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.2.1, 3.3.1, 3.3.2, 3.3.3,, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 4.2.3, 5.2.1, 5.2.5, 6.1.7, 6.2.1	840	Casting Cooling Baghouse	940
320	Pouring	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 40CFR Part 63 Subpart EEEEE	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 4.2.3, 5.2.1, 5.2.5, 6.1.7	840	Casting Cooling Baghouse	940

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Emission Units			Specific Limitations/Requirements		Air Pollution Control Devices		Stack ID
ID No.	Description	Process Group	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description	ID No.
330	In-Mold Cooling	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.2.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 4.2.3, 5.2.1, 5.2.5, 6.1.7	840	Casting Cooling Baghouse	940
340	Sand Shake- out	MPCS	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.2.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 4.2.3, 5.2.1, 5.2.5, 6.1.7	840	Casting Cooling Baghouse	940
350	Casting Cooling	FIN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.2.1, 3.3.2, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.5, 6.1.7	830	Finish Baghouse	930
360	Desprue	FIN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.2, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.5, 6.1.7	830	Finish Baghouse	930
370	Shot Blast Machine	FIN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.2, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.5, 6.1.7	830	Finish Baghouse	930
380	Grinding Unit	FIN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.2, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.5, 6.1.7	830	Finish Baghouse	930
381	Grinding Unit	FIN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.2, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.5, 6.1.7	830	Finish Baghouse	930
382	Grinding Unit	FIN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.2, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.5, 6.1.7	830	Finish Baghouse	930
388	Rust Inhibitor Application	FIN	391-3-1-.02(2)(e)	3.4.1, 6.2.1	None.	None.	None.
389	Rust Inhibitor Application	FIN	391-3-1-.02(2)(e)	3.4.1, 6.2.1	None.	None.	None.
600	Day Storage #1	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.4.1, 3.4.2	880	Bin Vent Filter	980
601	Day Storage #2	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.4.1, 3.4.2	881	Bin Vent Filter	981
602	Day Storage #3	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.4.1, 3.4.2	882	Bin Vent Filter	982
603	Day Storage #4	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.4.1, 3.4.2	883	Bin Vent Filter	983
610	Fluidized Bed Sand Classifier #1	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7	820	Sand Baghouse	920
611	Fluidized Bed Sand Classifier #2	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7	820	Sand Baghouse	920

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Emission Units			Specific Limitations/Requirements		Air Pollution Control Devices		Stack ID
ID No.	Description	Process Group	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description	ID No.
612	Fluidized Bed Sand Classifier #3	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 6.1.7	820	Sand Baghouse	920
613	Fluidized Bed Sand Classifier #4	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7	820	Sand Baghouse	920
620	Weigh Hopper #1	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7, 6.2.1	820	Sand Baghouse	920
621	Weigh Hopper #2	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7, 6.2.1	820	Sand Baghouse	920
622	Weigh Hopper #3	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7, 6.2.1	820	Sand Baghouse	920
623	Weigh Hopper #4	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7, 6.2.1	820	Sand Baghouse	920
630	Batch Mixer #1	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7	820	Sand Baghouse	920
631	Batch Mixer #2	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7	820	Sand Baghouse	920
632	Batch Mixer #2	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7	820	Sand Baghouse	920
633	Batch Mixer #4	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7	820	Sand Baghouse	920
640	Core Machine #1	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.2.1, 3.3.1, 3.3.4, 3.4.1, 3.4.2, 6.2.1	821, 824	Core Room Scrubber, Core Machine Cyclone	921
641	Core Machine #2	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.2.1, 3.3.1, 3.3.4, 3.4.1, 3.4.2, 4.2.3, 5.2.3, 6.1.7, 6.2.1	821, 824	Core Room Scrubber, Core Machine Cyclone	921

TITLE V MINOR MODIFICATION (with construction) APPLICATION REVIEW

Emission Units			Specific Limitations/Requirements		Air Pollution Control Devices		Stack ID
ID No.	Description	Process Group	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description	ID No.
642	Core Machine #3	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e),	2.2..1, 3.3.1, 3.3.4, 3.4.1, 3.4.2, 4.2.3, 5.2.3, 6.1.7, 6.2.1	821, 824	Core Room Scrubber, Core Machine Cyclone	921
643	Core Machine #4	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e),	2.2..1, 3.3.1, 3.3.4, 3.4.1, 3.4.2, 4.2.3, 5.2.3, 6.1.7, 6.2.1	821, 824	Core Room Scrubber, Core Machine Cyclone	921
680	Dryer #1	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g)	3.3.1, 3.4.1, 3.4.2, 3.4.3	None.	None.	980, 985
681	Dryer #2	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g)	3.3.1, 3.4.1, 3.4.2, 3.4.3	None.	None.	981, 986
682	Dryer #3	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g)	3.3.1, 3.4.1, 3.4.2, 3.4.3	None.	None.	982, 987
683	Dryer #4	CSA	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g)	3.3.1, 3.4.1, 3.4.2, 3.4.3	None.	None.	983, 988
700	Weigh Hoppers	SAN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7, 6.2.1	820	Sand Baghouse	920
710	Sand Cooler	SAN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7	820	Sand Baghouse	920
711	Blender/Conveying	SAN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7	820	Sand Baghouse	920
715	Returned System Sand Storage Bin	SAN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7	820	Sand Baghouse	920
716	Returned System Sand Storage Bin	SAN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7	820	Sand Baghouse	920
730	Sand Mixer	SAN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7	820	Sand Baghouse	920
731	Sand Mixer	SAN	40 CFR 52.21, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.5, 6.1.7	820	Sand Baghouse	920

* Generally Applicable Requirements contained in this permit may apply also to emission units listed above.

C. Equipment & Rule Applicability

Rule (b) states that visible emissions from any source are not to equal or exceed 40 percent opacity. All the bin vents will be subject to Rule b.

D. Compliance Status

This facility is operating in compliance with its air quality permit.

E. Operational Flexibility

None

F. Permit Conditions

Condition 3.4.2 was modified to include the bin vents exhaust for Rule b applicability

Condition 6.2.1 was modified to remove trademark reference of Isocure and replace it with PUCB (polyurethane core binder)

V. Testing Requirements (with Associated Record Keeping and Reporting)

The recent test report for MACT compliance demonstrates that the PM emissions from the baghouses are 20 % of the standards. Furthermore, removing the sources from the baghouse and venting it to bin vents would decrease the emissions from the baghouses. Hence, no new testing is required for the proposed changes.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

Permit Condition 5.2.1 was modified to include daily VE checks for the bin vents.

VI. Other Record Keeping and Reporting Requirements

Not applicable

VII. Specific Requirements

- A. Operational Flexibility: Not Applicable
- B. Alternative Requirements: Not applicable.
- C. Insignificant Activities: Not applicable.
- D. Temporary Sources: Not applicable.
- E. Short-Term Activities: Not applicable.

F. Compliance Schedule/Progress Reports:

The facility is operating in compliance with all applicable air quality rules and regulations.

G. Emissions Trading: Not applicable.

H. Acid Rain Requirements: Not applicable.

I. Prevention of Accidental Releases: Not applicable.

J. Stratospheric Ozone Protection Requirements: Not applicable.

K. Pollution Prevention: Not applicable.

L. Specific Conditions: Not applicable.

Addendum to Narrative

The 45-day EPA review started on June 19, 2008 and ended on August 3, 2008. No Comments were received from the EPA or the company by the Division.