

**Washington State Department of Ecology
Eastern Region Office
4601 N. Monroe Street
Spokane, Washington 99205-1295**

In the matter of compliance by D&L FOUNDRY)	Air Operating Permit No.: DRAFT
Located in Moses Lake, Washington with Section)	AQPID: A0250117
70A.15.2260 RCW, Operating Permits for Air)	
Contaminant Sources, and the applicable rules)	
and regulations of the Department of Ecology)	

To: D&L Foundry
12970 Wheeler Road
Moses Lake, WA 98837

Issuance Date:	DATE
Effective Date:	DATE
Expiration Date:	DATE

Responsible Official: Jason McGowan

Legal Authority: This Air Operating Permit is issued under the authority and provisions of the Federal Clean Air Act (FCAA), (42 U.S.C. 7401, et seq.), the Washington Clean Air Act, Chapter 70A.15 Revised Code of Washington (RCW) and the Operating Permit Regulation, Chapter 173-401 Washington Administrative Code (WAC).

Hereinafter, D&L Foundry is called the Permittee. The permittee is required to comply with the provisions contained within this permit.

This Air Operating Permit DATED at Spokane, Washington, this **X** day of **MONTH** 2025.

Prepared By:

Approved By:

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Commercial/Industrial Unit
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List of Abbreviations

AOP	Air Operating Permit
BACT	Best Available Control Technology
BTU	British Thermal Units
°C	Degrees Celsius
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
dscf	Dry Standard Cubic Foot
dscf/m	Dry Standard Cubic Foot per minute
Ecology	Washington State Department of Ecology
E.I.T.	Engineer in Training
EPA	United States Environmental Protection Agency
°F	Degrees Fahrenheit
FAAA	Federal Clean Air Act
FDCP	Fugitive Dust Control Plan
ft ³	Cubic foot
gr/dscf	Grain per dry standard cubic foot
hr	Hour
MMBtu	Million British Thermal Units
MRRR	Monitoring, Recordkeeping, and Reporting Requirement
MVAC	Motor Vehicle Air Conditioner
N ₂	Nitrogen gas
NOC	Notice of Construction
NO _x	Oxides of Nitrogen
NSPS	New Source Performance Standard
O ₂	Oxygen
O&M	Operation & Maintenance
P.E.	Professional Engineer
PM	Particulate Matter
PM-10	Particulate Matter with aerodynamic diameter ≤ 10 micrometers
ppm	Parts per million
QIP	Quality Improvement Plan
PSD	Prevention of Significant Deterioration
RACT	Reasonably Available Control Technology
RCW	Revised Code of Washington
RM	EPA Reference Method from 40 CFR Part 60, Appendix A
scfm	Standard Cubic Feet per Minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TAP	Toxic Air Pollutant (per WAC 173-460)
TPD	Tons Per Day
TPY	Tons Per Year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound
WAC	Washington Administrative Code

All submittals required by this permit to be submitted to the Department of Ecology, the Environmental Protection Agency (EPA), or both as specified by the applicable requirement, will be submitted to the following addresses.

Washington Department of Ecology
Air Quality Program
4601 N. Monroe Street
Spokane, WA 99205-1295

U.S. EPA Region 10 Administrator
Air Permits, MS OAQ-108
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

Standard Conditions

1) Permit Conditions

a) Permit Shield

- i) Compliance with the terms and conditions of this permit will be deemed compliance with those applicable requirements that are specifically included and identified in this permit as of the date of permit issuance.
- ii) The permit shield will not apply to any insignificant emissions unit or activity designated under WAC 173-401-530.

[WAC 173-401-530(3), WAC 173-401-640(1)]

b) Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

c) Severability

If any provision of this permit is held to be invalid, all unaffected provisions of the permit will remain in effect and be enforceable. [WAC 173-401-620(2)(h), RCW 70A.15.9004]

d) Enforceability

All terms and conditions of the permit, including any provisions designed to limit a source's potential to emit, are enforceable by the EPA and citizens unless specifically designated as state-only enforceable. [WAC 173-401-625]

e) General Obligation

Nothing in this permit will alter or affect the following:

- i) Provisions of Section 303 of the FCAA (emergency orders), including the authority of EPA under that section.
- ii) 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.
- iii) The applicable requirements of the acid rain program, consistent with Section 408(a) of the FCAA.

- iv) The ability of EPA to obtain information from a source pursuant to Section 114 of the FCAA.
- v) The ability of Ecology to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in Chapter 252, Laws of 1993.

[WAC 173-401-640(4)]

f) **Permit Actions**

This operating 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 re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [WAC 173-401-620(2)(c)]

g) **Permit Continuation**

This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, will not expire until the renewal permit has been issued or denied if a timely and complete renewal application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) will remain in effect until the renewal permit has been issued or denied if a timely and complete renewal application has been submitted. [WAC 173-401-620(2)(j)]

h) **Permit Appeals**

This permit or any conditions in it may be appealed only by filing an appeal with the Pollution Control Hearings Board, PO Box 40903, Olympia, WA 98504-0903 and concurrently serving it on the Department of Ecology, PO Box 47600, Olympia, WA 98504-7600 and the Department of Ecology, Eastern Regional Air Quality Program, 4601 N. Monroe Street, Spokane, WA 99205-1295 within 30 days of receipt of this permit, pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA. [WAC 173-401-620(2)(i)]

i) **Need to Halt or Reduce Activity not a Defense**

It will 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 this permit. [WAC 173-401-620(2)(b)]

j) **Reasonably Available Control Technology**

Emission standards and other requirements contained in rules or regulatory orders in effect at the time of operating permit issuance or renewal will be considered RACT for purpose of permit issuance or renewal. This does not preclude RACT determinations under Section 8, Chapter 252, Laws of 1993, which will be incorporated into an operating permit as provided in WAC 173-401-730. [WAC 173-401-605(3); RCW 70A.15.2230]

2) Permit Administration

a) Duty to Comply

The permittee must comply with all the conditions of Chapter 173-401 operating permit. Any permit noncompliance constitutes a violation of Chapter 70A.15 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application. [WAC 173-401-620(2)(a)], [Order No. 24AQ-E009, Issued 7/23/24, Approval Condition 9(a)]

b) Compliance Schedules

The permittee will continue to comply with the applicable requirements with which it is currently in compliance. The permittee will meet applicable requirements on a timely basis that become effective during the permit term. [WAC 173-401-510(2)(h)(iii)(A)], [WAC 173-401-510(2)(h)(iii)(B)]

c) Permit Renewal and Expiration

This permit is issued for a fixed term of five years. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application (as outlined in WAC 173-401-510) is submitted at least 12 months, but no greater than 18 months prior to the date of permit expiration. A complete renewal application is due no later than DATE, 20xx.

Upon receipt of a timely and complete application for renewal, this source may continue to operate subject to final action by Ecology on the renewal application. This allowance will cease to apply if, subsequent to a completeness determination, the applicant fails to submit by the deadline specified in writing by Ecology, any additional information identified as being needed to process the application. The application will be sent to Ecology at the address included in this permit. [WAC 173-401-610], [WAC 173-401-710]

d) Duty to Provide Information

The permittee will furnish to Ecology, within a reasonable time, any information that Ecology 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 will also furnish to Ecology copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to Ecology along with a claim of confidentiality. Ecology will maintain confidentiality of such information in accordance with RCW 70A.15.2510. No person will make any false material statement, representation or certification in any form, in either notice or required report. No person will render inaccurately any required monitoring device or method. [WAC 173-401-620(2)(e)], [WAC 173-400-105(7), (8)]

e) Duty to Supplement or Correct Application

The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application will promptly submit such supplementary facts or corrected information. The permittee will also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit. [WAC 173-401-500(6)].

f) Permit Fees

The permittee will pay fees as a condition of this permit in accordance with Ecology's fee schedule. Failure to pay fees in a timely fashion will subject the permittee to civil and criminal penalties as prescribed in Chapter 70A.15 RCW. Ecology may revoke this operating permit if the permit fees are not paid, per WAC 173-401-930(3). [WAC 173-401-620(2)(f)], [WAC 173-401-930(3)][RCW 70.94.162(1)]

g) Inspection and Entry

Upon presentation of credentials and other documents as may be required by law, the permittee will allow Ecology, EPA, or an authorized representative to perform the following:

- i) Enter upon the permittee's premises where a Chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
- ii) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- iii) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- iv) As authorized by WAC 173-400-105 and the FCCA, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.
 - (1) Ecology may require the permittee to conduct stack testing and/or ambient air monitoring and report the results to Ecology.
 - (2) Ecology may conduct or require that a test be conducted using approved methods from 40 CFR parts 51, 60, 61 and 63 (in effect on March 6, 2019, August 26, 2019, September 24, 2018, and August 23, 2019, respectively), or the *Ecology Source Test Manual September 20, 2004*. The permittee will be required to provide platform and sampling ports. Ecology will be allowed to obtain a sample from any emissions unit. The permittee will be given the opportunity to observe the sampling and to obtain a sample at the same time.

- v) No person will obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties.
- vi) Nothing in this condition will limit the ability of Ecology or the EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the FCAA.

[WAC 173-401-630(2)], [WAC 173-400-105(2),(4)], [RCW 70A.15.2500], Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 9(c)]

h) **Recordkeeping**

- i) **Recordkeeping:** the permittee will keep records of required monitoring information and support data for a period of five years from the date of collection. Records will include, where applicable, the following:
 - (1) The date, place, and time of the sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analysis.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

[WAC 173-401-615(2)(a), (c)]

- ii) **NSPS Recordkeeping:** The permittee will maintain the following records for a period of five years from the date of collection.
 - (1) Records of the occurrence and duration of any startup, shutdown or malfunction of an affected facility; any malfunction of air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
 - (2) You must keep records that demonstrate compliance with the requirements for restricted metallic scrap, and/or for the use of general scrap, and for mercury as applicable. You must keep records documenting compliance for scrap that does not contain motor vehicle scrap.
 - (3) If you are subject to the requirements for a site-specific plan for mercury, you must:
 - (a) Maintain records of the number of mercury switches removed or the weight of mercury recovered from the switches and properly managed, the estimated number of vehicles processed, and an estimate of the percentage of mercury switches recovered.

- (b) Submit semiannual reports of the number of mercury switches removed or the weight of mercury recovered from the switches and properly managed, the estimated number of vehicles processed, an estimate of the percent of mercury switches recovered, and a certification that the recovered mercury switches were recycled at RCRA-permitted facilities. The semiannual reports must include a certification that you have conducted periodic inspections or taken other means of corroboration as required. You must identify which option applies to each scrap provider, contract, or shipment. You may include this information in the semiannual compliance reports required under paragraph (c) of this section.
- (4) You must keep records to document use of any binder chemical formulation that does not contain methanol as a specific ingredient of the catalyst formulation for each furfuryl alcohol warm box mold or core making line. These records must be the Material Safety Data Sheet (provided that it contains appropriate information), a certified product data sheet, or a manufacturer's hazardous air pollutant data sheet.
- (5) You must keep records of monthly metal melt production for each calendar year.
- (6) You must keep a copy of the operation and maintenance plan and records that demonstrate compliance with plan requirements.
- (7) All measurements, including continuous monitoring system, monitoring device, and performance testing measurements.
- (8) All continuous monitoring system performance evaluations.
- (9) Results of all continuous monitoring system or monitoring device calibration checks, QA procedures, adjustments and maintenance.

[40 CFR 60.7(b), (f); 40 CFR 63, Subpart ZZZZZ]

i) **Reporting**

- i) **Deviation Reports:** The permittee will report deviations from permit conditions, including those attributable to upset conditions as defined in this permit, and include the following information: the time the deviation occurred, the duration of the deviation, the magnitude of the deviation in relation to the applicable limit, the probable cause of the deviation, and any corrective actions or preventive measures taken. Such deviations will be reported to Ecology at the address included in this permit.
 - (1) Deviations which represent a potential threat to human health or safety must be reported as soon as possible, but in no case later than 12 hours after the deviation is discovered.
 - (2) Excess emissions due to emergency (§2.10.1), or which the source believes unavoidable (§2.10.2) will be reported within two working days of the event.

- (3) Other deviations will be reported no later than 30 days after the end of the month in which the deviation is discovered.
- (4) Upon request by Ecology, the permittee will submit a full written report including further details regarding the known causes, the corrective actions taken, and the preventative measures to take to minimize or eliminate the chance of recurrence. The source will maintain a contemporaneous record of all deviations.
- (5) Responsible official certification of all monthly deviation reports submitted during the previous six-month period will be included in each semi-annual monitoring report.

[WAC 173-401-615(3)(b)], [WAC 173-400-107], [WAC 173-401-630(1)], [Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 7]

- ii) **Semi-Annual Monitoring Reports:** The permittee will submit reports of any required monitoring (i.e., Monitoring Recordkeeping and Reporting identified in Section 6 of this permit) at least once every six months. Monitoring periods will be January 1st — June 30th, and July 1st — December 31st. Semi-annual monitoring reports will be due no later than 45 days following the end of each six-month period. All instances of deviations from permit requirements must be clearly identified in such reports. Failure to conduct any required monitoring must be reported as a deviation. The report must include identification of all months during which no deviations occurred. All semi-annual monitoring reports must be certified by a responsible official consistent with Condition 2.i.vi. [WAC 173-401-615(3)(a)]
- iii) **NSPS: Excess Emissions and Compliance Reports:** The permittee will submit compliance reports semi-annually (except where more frequent reporting is specifically required). Reports will be postmarked by the end of the 30th day following the end of the reporting period and include.
 - (1) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective action taken.
 - (2) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other calibration checks, if applicable).
 - (3) Summary information on any deviation from the pollution prevention management practices, the operation and maintenance requirements, and the corrective action taken.
 - (4) Excess emission reports must contain the following:
 - (a) The magnitude of excess emissions, and the beginning and end time of each time period of excess emissions.

- (b) The process operating time during the reporting period.
 - (c) Identification of each period of excess emissions occurring during startup, shutdowns and malfunctions. Include the nature and cause of any malfunction.
 - (d) The nature and cause of any malfunction (if known), the corrective actions taken or preventative measures adopted.
 - (e) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks, and the nature of repairs or adjustments.
 - (f) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information will be stated in the report.
- (5) A summary report containing information in 40 CFR 60.7(d) will be submitted for each pollutant monitored.
 - (6) Copies of excess emission reports will be maintained onsite for at least five years in a permanent form and available for inspection.
 - (7) No relaxation of reporting frequency is allowed.

[40 CFR 63, Subpart ZZZZZ; Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 9(c)]

iv) **Compliance Certifications:** The permittee will submit a certification of compliance with permit terms and conditions at least once per calendar year. All certifications will be submitted no later than 45 days following the end of the certification period. Ecology may require that compliance certifications be submitted more frequently for those emission units not in compliance with permit terms and conditions, or where more frequent certification is specified in the applicable requirement. [WAC 173-401-630(5)(a)], [WAC 173-401-630(1)]

- (1) The certification will describe and include the following:
 - (a) The permit term or condition that is the basis of the certification.
 - (b) The current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The methods used for determining compliance, currently and over the reporting period consistent with WAC 173-401-615(3)(a).

(e) All compliance certifications will be submitted to Ecology and EPA Region 10 at the addresses included in this permit.

[WAC 173-401-630(5)(d)]

(2) Where the permit does not require testing, monitoring, recordkeeping and reporting for insignificant emissions units or activities, the permittee may certify continuous compliance if there were no observed, documented, or known instances of noncompliance during the reporting period. [WAC 173-401-530(2)(d)]

(3) All compliance certifications will include certification by a responsible official in accordance with Condition 2.i.vi.

(4) For the purpose of submitting compliance certifications, or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing in 40 CFR Part 60 or in the Washington State Implementation Plan will preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test had been performed.

[40 CFR 52.33(a)], [40 CFR 60.11(g)], [40 CFR 60.12]

v) **Emission Inventory** The permittee will submit an inventory of actual emissions from the source for each calendar year. The inventory will include stack and fugitive emissions of TSP, PM₁₀, PM_{2.5}, SO_x, CO, NO_x, VOC, ammonia, lead, and total TAPs. This will be submitted no later than April 15th after the end of the calendar year for which the emissions inventory was requested. If April 15th falls on a weekend, then the deadline to file will be the next business day.

(1) The source will maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. Emissions inventories will be sent to Ecology at the address included in this permit.

(2) Together with the annual emission inventory the permittee will submit an annual report that includes annual quantities of grey iron produced, ductile iron produced, no-bake cores produced, and greensand handled.

[WAC 173-400-105(1)], [Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 7(c) and 7(h)]

vi) **Submittals:** Reports, test data, monitoring data, notifications, certifications, and applications (including requests for renewal) will be submitted to Ecology at the address included in this permit. Any application form, report or compliance certification submitted to Ecology pursuant to this permit will contain certification of truth, accuracy, and completeness by a responsible official. Where the permit requires reporting more frequently than once every six months the responsible

official's certification need only be submitted together with the semi-annual monitoring report required by Condition 2.i.ii. The certification must cover all required reporting from the date of the last certification. All certifications will state that *"based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete"*. The permittee will promptly, upon discovery, report to Ecology any material error or omission in these records, reports, plans or other documents.

[WAC 173-401-520], [WAC 173-401-500(6)], [40 CFR 60.4(a), (b)]

j) **Excess emissions**

i) **Excess emissions due to emergency:** An emergency¹, as defined in WAC 173-401-645(1), constitutes an affirmative defense to an action brought for non-compliance with a technology-based ²emission limitation if the permittee demonstrates through properly signed, contemporaneous operating logs or other relevant evidence that:

- (1) An emergency occurred and the permittee can identify the cause(s) of the emergency.
- (2) The permitted facility was at the time being properly operated.
- (3) During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
- (4) The permittee submitted notice of the emergency to Ecology within **two working days** of the time when emission limitations were exceeded due to the emergency, or shorter periods of time specified in an applicable requirement. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (5) In any enforcement action, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

[WAC 173-401-64]

ii) **Unavoidable Excess Emissions:** Excess emissions determined to be unavoidable under the procedures and criteria in WAC 173-400-107 will be excused and not subject to penalty.

¹ An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, which requires immediate corrective action to restore normal operation. An emergency does not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

² Technology-based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes.

- (1) The permittee will have the burden of proving to Ecology that excess emissions were unavoidable. This demonstration will be a condition to obtaining relief under 2.j.ii.2, 2.j.ii.3 or 2.j.ii.4.
- (2) Excess emissions due to startup or shutdown conditions will be considered unavoidable provided the source reports as required under Condition 2.i.i and adequately demonstrates that the excess emissions could not have been prevented through careful planning and design, and if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage.
- (3) Excess emissions due to scheduled maintenance will be considered unavoidable if the source reports as required under Condition 2.i.i and adequately demonstrates that the excess emissions could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.
- (4) Excess emissions due to upsets will be considered unavoidable provided the source reports as required under Condition 2.i.i and adequately demonstrates that:
 - (a) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance.
 - (b) The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded.

[WAC 173-400-107(3)]

k) **Federal Chlorofluorocarbons (CFC) Requirements**

Title VI of the FCAA 1.24.1

- i) The permittee will comply with the following standards for recycling and emissions reductions pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B.
 - (1) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.
 - (2) Equipment used during the maintenance, service, repair or disposal must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- (3) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" is defined at 40 CFR 82.152.)
 - (5) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.
 - (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep servicing records documenting the date and type of service, as well as the quantity of refrigerant added. The owner/operator must keep records of refrigerant purchased and added to such appliances in cases where owners add their own refrigerant. Such records should indicate the date(s) when refrigerant is added pursuant to 40 CFR 82.166.
 - (7) People conducting maintenance, service, repair, or disposal of appliances must follow the prohibitions pursuant to 40 CFR 82.154.
 - (8) The person performing maintenance, service, repair, or disposal of appliances must certify to the Administrator that such person has acquired certified recovery of recycling equipment pursuant to 40 CFR 82.162.
 - ii) 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 82, Subpart A – Production and Consumption Controls.
 - iii) If the permittee performs a service on motor (fleet) vehicles and when this service involves ozone depleting substance refrigerant in the MVAC, the permittee is subject to all applicable requirements as specified in 40 CFR 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
 - iv) The permittee will be allowed to switch from any ozone depleting substance to any alternative that is listed in the Significant New Alternative Program promulgated pursuant to 40 CFR 82, Subpart G – Significant New Alternative Policy Program.
- [40 CFR 82], [RCW 70A.15.6410], [RCW 70A.15.6420]

l) Circumvention to conceal violation of an NSPS Standard

- i) The permittee will not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission, which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. [40 CFR 60.12]

m) Insignificant Emission Units

- i) Upon request from the permitting authority the permittee must provide documentation sufficient to enable the authority to determine that the emission unit or activity has been appropriately listed as insignificant.

An activity or emissions unit that qualifies as insignificant solely on the basis of WAC 173-401-530 (1)(a) will not exceed the emissions thresholds specified in WAC 173-401-530(4) until the permit is modified pursuant to WAC 173-401-725 (Permit modifications).

Testing, monitoring, recordkeeping and reporting are not required for insignificant emissions units and activities unless determined by the permitting authority to be necessary to assure compliance or unless it is otherwise required by a generally applicable requirement of the state implementation plan.

Upon request from the permitting authority, at any time during the term of the permit, an applicant who lists an activity or emissions unit as insignificant under WAC 173-401-530 (1)(a) will demonstrate to the permitting authority that the actual emissions of the unit or activity are below the emission thresholds. [WAC 173-401-530(2), (4), (5), (6)]

3) Permit Changes

a) Changes not requiring permit revisions

- i) *Section 502(b)(10) changes.* The permittee is authorized to make Section 502(b)(10) changes, as defined in WAC 173-401-200(30), without a permit revision, providing the conditions included below are met. The permit shield as described in Condition 1.i will not apply to any change made pursuant to this paragraph.

- (1) The proposed changes are not Title I (FCAA) modifications.
- (2) The proposed changes do not result in emissions, which exceed those allowable under the permit, whether expressed as a rate of emissions, or in total emissions.
- (3) The proposed changes do not alter permit terms that are necessary to enforce limitations on emissions from units covered by the permit.
- (4) The facility provides Ecology and EPA with written notification at least seven days prior to making the proposed changes except that written notification of a change made in response to an emergency will be provided as soon as possible after the event.
 - (a) The written notification will include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

- ii) *Changes related to Emissions trading under an emissions cap.* Pursuant to Condition 3.i.i, the permittee is authorized to trade increases and decreases in emissions in the permitted facility, where the Washington State Implementation Plan (Washington SIP) provides for such emissions trades without requiring a permit revision. This provision is available in those cases where the permit does not already provide for such emissions trading. Such changes will be subject to the following:
- (1) The written notification required under Condition 3.i.i.4 will include such information as may be required by the provision in the Washington SIP authorizing the emissions trade, including at a minimum, when the proposed change will occur, a description of each such change, any change in emissions, the permit requirements with which the source will comply using the emissions trading provisions of the Washington SIP, and the pollutants emitted subject to the emissions trade. The notice will also refer to the provisions with which the source will comply with the applicable implementation plan and provide for the emissions trade. The notification will state how any increases or decreases in emissions will comply with the terms and conditions of the permit. (The permit shield described under Condition 1.i will extend to terms and conditions that allow such increases and decreases.)
 - (2) The permit shield described in Condition 1.i will not extend to any change made under this paragraph. Compliance with the permit requirements that the source will meet using the emissions trade will be determined according to the requirements of the applicable implementation plan authorizing the emissions trade.
 - (3) Upon the request of the permit applicant, Ecology will issue permits that contain terms and conditions, including all terms required under WAC 173-401-600 through 173-401-630 to determine compliance, allowing for the trading of emissions increases and decreases in the Chapter 173-401 WAC source solely for the purpose of complying with a federally enforceable emissions cap that is established in the permit independent of otherwise applicable requirements. The permit applicant will include in its application proposed replicable procedures and permit terms that ensure the emissions trades are quantifiable and enforceable. The emissions trading provision will not be applied to any emissions units for which emissions are not quantifiable or for which there are no replicable procedures to enforce the emissions trades. The permit will also require compliance with all applicable requirements.
 - (4) A source making a change under this section will comply with applicable preconstruction review requirements established pursuant to Condition 4.i.
 - (5) No permit revision will be required, under any approved economic incentives, marketable permits, and other similar programs or processes for changes that are provided for in this permit such as emissions trading.

b) Off-Permit Changes

The permittee is allowed to make certain changes that are not specifically addressed or prohibited by this permit without a permit revision. All such changes must meet the following conditions:

- i) The proposed changes will not weaken the enforceability of any existing permit conditions.
- ii) Each such change will meet all applicable requirements and will not violate any existing permit term or condition.
- iii) Before or contemporaneously with making the permit change, the permittee must provide written notice to Ecology and EPA Region 10 at the respective addresses included in this permit. Such written notice will describe each such change, including the date, any change in emissions or pollutants emitted, and any applicable requirements that would apply as a result of the change.
- iv) The change will not qualify for the permit shield under Condition 1.i.
- v) The permittee will record all changes that result in emissions of any regulated air pollutant subject to any applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes. The record will reside at the permitted facility.
- vi) A source making a change under this section will comply with the preconstruction review requirements established pursuant to Conditions 4.i and 4.ii.

c) Reopening for Cause

- i) Ecology will reopen and revise this permit as necessary to remedy deficiencies in the following circumstances:
 - (1) Additional requirements under the FCAA become applicable to a major source three or more years prior to the expiration date of this permit. Such a reopening will be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j).
 - (2) Ecology or the Administrator determines that this permit contains a material mistake, or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
 - (3) Ecology or the Administrator determines that the permit must be revised or revoked to ensure compliance with the applicable requirements.
- ii) Proceedings to reopen and issue this permit will follow the same procedures as apply to initial permit issuance and will affect only those parts of this permit for

which cause to reopen exists. Such reopening will be made as expeditiously as practicable.

iii) Reopening will not be initiated before a notice of intent to reopen is provided to the permittee by Ecology at least 30 days in advance of the date that this permit is to be reopened, except that Ecology may provide a shorter time period in the case of an emergency.

iv) All permit conditions remain in effect until such time as Ecology takes final action.

[WAC 173-401-730]

d) Administrative Permit Amendments

i) An administrative permit amendment is a permit revision that:

(1) Allows for a change in ownership or operational control of this source where the permitting authority has determined that no other change in this permit is necessary and 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 Ecology.

(2) Corrects typographical errors within the permit.

(3) Identifies a change in the name, address, or phone number of any person identified in the permit or provides for a similar minor administrative change at the source.

(4) Requires more frequent monitoring or reporting by the permittee.

(5) Incorporates into the permit the terms, conditions, and provisions from orders approving notice of construction applications processed under an EPA-approved program, provide that such a program meets procedural requirements substantially equivalent to the requirements of WAC 173-401-700, 173-401-725, and 173-401-800 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in WAC 173-401-600 through 173-401-650.

ii) The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.

iii) The permitting authority will, upon taking final action granting a request for an administrative permit amendment, allow coverage by the permit shield in WAC 173-401-640 for administrative permit amendments made pursuant to Condition 3.d.i.5 above.

[WAC 173-401-720]

4) Applicable When Triggered Requirements

The following requirements apply if the permittee takes certain actions or proposes changes that trigger applicability. No monitoring is specified for these requirements, but the Compliance Certification specified in Section 2.9.4 must include a description of the permittee's compliance status.

a) New Source Review

The permittee will not construct new sources or make modifications required to be reviewed under WAC 173-400-110, WAC 173-400-113, WAC 173-400-114, or WAC 173-460 before the permittee obtains written final approval from Ecology in accordance with those regulations, pays the appropriate fees required by WAC 173-455-120, and pays the cost of public notice described in WAC 173-400-171.

[WAC 173-400-110], [WAC 173-400-113], [WAC 173-455-120], [WAC 173-400-114], [WAC 173-400-171], [WAC 173-460], [RCW 70A.15.2210], [Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 9]

b) NSPS Notification of Physical or Operational Change

In the event of any physical or operational change to an existing facility, which may increase the emission rate of any air pollutant to which a standard applies, the permittee will provide notice as required. This notice will be postmarked 60 days or as soon as practicable before the change is commenced and will include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. Ecology may request additional relevant information subsequent to this notice. These requirements are in addition to any pre-construction review requirements as outlined under Condition 4.i.

[40 CFR 60.7(a)(4)], [Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 9]

c) Replacement or Substantial Alteration of Emission Control Technology

Prior to replacing or substantially altering emission control technology subject to review under WAC 173-400-114, the permittee will file for and obtain approval from Ecology according to that regulation. The permittee will pay the appropriate fees required by WAC 173-455-100(4) prior to commencing construction.

[WAC 173-455-100(4)], [WAC 173-400-114], [RCW 70A.15.2220]

d) Demolition and Renovation (asbestos)

Prior to, during, and after conducting any activity to which 40 CFR 61, Subpart M – National Emission Standard for Asbestos, applies, the permittee will comply with the requirements of that rule. Such activities include notification, demolition, renovation, asbestos stripping or removal, installing or reinstalling insulation, manufacturing of fabricating certain items, spraying of certain materials, constructing roadways of certain materials, or disposal.

[40 CFR 61, Subpart M], [WAC 173-400-075(1)]

e) **Source Testing**

The following notification and reporting conditions apply to all required source testing.

- i) **Notification**: The permittee will provide at least 30-day notice prior to any performance test. The notice will include a source test plan for approval. If Ecology does not provide comments on the plan within three weeks, the plan will be considered acceptable. If there is a delay in conducting a scheduled performance test, the permittee will notify Ecology as soon as possible. The notification will include at least:
 - (1) A test schedule.
 - (2) Proposed test methods, including any request to deviate from a required test method.
 - (3) Operating conditions (production rates, equipment operating rates, etc.) during the test.
 - (4) Any adjustments that will be made prior to the stack test, such as tuning burners or changing bags in a baghouse. Normally scheduled periodic maintenance need not be included.
- ii) **Source Test Methods**: Source testing will be conducted using EPA methods from 40 CFR Parts 51, 60, 61 and 63 (in effect at time of permit issuance). Use of any other test methods must be requested per 4.5.1.2 and approved in advance.
- iii) **Test reports**: The permittee will submit source test reports to Ecology within 60 days of test completion. Test reports will include:
 - (1) The date and time of the test.
 - (2) A description of the source, associated pollution control equipment and sampling locations.
 - (3) A description of the test methods and quality assurance procedures used.
 - (4) A summary of results in the same units and averaging periods as the applicable emission standard.
 - (5) Field data and sample calculations.
 - (6) Operating conditions such as the amount of fuel burned, steam generated, raw materials processed, and product produced during the test.
 - (7) Source and control equipment operating parameters measured during the test.

[WAC 173-401-630(1)], [Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 8].

f) **NSPS Source testing requirements**

The permittee will conduct performance tests when required by terms of this permit and at other times as the EPA or Ecology may require.

- i) **Test Methods and Procedures**: Performance tests will be conducted and data reduced in accordance with the specified test method, unless alternative methods are approved in advance.
- ii) **Test Conditions**: Testing will be performed under conditions specified by Ecology based on representative performance of the affected facility. The permittee will make available to Ecology records necessary to determine the conditions of the performance test. Operations during startup periods, shutdown and malfunction will not constitute representative conditions for the purpose of performance testing. Emissions in excess of the emission limit during periods of startup, shutdown and malfunction will not be considered a violation of the emission limit unless otherwise specified in the applicable standard.
- iii) **Continuous Monitoring Systems and Monitoring Devices**: All continuous monitoring systems and monitoring devices will be installed such that representative measurements of emissions or process parameters are obtained, and operational prior to conducting performance testing. Verification of operational status will, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation, and calibration of the device.
- iv) **Testing Facilities**: The permittee will provide the following performance testing facilities:
 - (1) Sampling ports are adequate for test methods. This includes (i) constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures, and (ii) providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures.
 - (2) Safe sampling platforms and access to platforms.
 - (3) Utilities for sampling and testing equipment.
- v) **Test Duration and Sampling Runs**: Unless otherwise specified, a performance test will consist of three separate runs of 60 minutes each using the reference test method specified in the permit condition. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs will apply.
- vi) **Lost Samples or Discontinued Test Runs**: If a sample is accidentally lost or one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the permittee's control, compliance may, upon Ecology

approval, be determined using the arithmetic mean of the results of the two other runs.

[40 CFR 60.8 (b), (c), (e), (f); 40CFR 60.13(b), Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 7(h)]

5) Emission Limitations and Work Practice Requirements

Pursuant to Washington Administrative Code (WAC) 173-401 the permittee is authorized to operate the processes described in Sections 5.1 through 5.9 until this permit expires, is modified or revoked. These processes are subject to the conditions included in Sections 5.1 through 5.9; to the Monitoring, Recordkeeping, and Reporting Requirements in Section 6, and to other terms and conditions specified in this permit³.

The column entitled **Description** in each table contains abbreviated and/or paraphrased versions of the applicable conditions, emission limitations or work practices. The cited condition, emission standard or work practice is the enforceable requirement. Any perceived discrepancies between the description and an underlying applicable requirement will be resolved by reference to the cited applicable requirement.

Testing Requirements

Although there are conditions with no on-going testing requirements, Ecology retains the authority to conduct or require that testing be conducted per WAC 173-400-105(4). Identification of the appropriate test method is necessary to make emission limits fully enforceable. Where the underlying applicable requirement does not specify the test method, Ecology has done so in this permit.

[WAC 173-401-615(1)(a)], [WAC 173-401-630(1)], [WAC 173-400-105(4)]

Streamlining

An asterisk following a condition number indicates that streamlining of a less stringent requirement has taken place and is described in the Statement of Basis.

a) Facility-Wide

This section is applicable to all emission sources at the facility, including emission units in Sections 5.2 through 5.12. Facility-wide requirements apply to insignificant emission units or activities—but testing, monitoring, recordkeeping and reporting are not required (see Condition 2.I). The permittee is required to certify compliance for insignificant emission units or activities per Condition 2.i.iv.

³ The monitoring, recordkeeping and reporting requirements in Section 6 do not apply to insignificant emissions units or activities.

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.a.i	WAC 173-400-040 (1 st)	F	All emissions units are required to use RACT	None	None
5.a.ii	WAC 173-400-040(1) Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3	F	The opacity of any fugitive emissions from foundry operations will not exceed 20 percent for more than three minutes in any hour, measured in accordance with Reference Method 9 by a certified observer.	RM 9, 22	1M
5.a.iii	WAC 173-400-040(2)	S	Particulate matter will not be deposited beyond the property in sufficient quantity to interfere unreasonably with the use and enjoyment of other's property	None	1M
5.a.iv	WAC 173-400-040(3)	F	Fallout. No person will cause or allow the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner or operator of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.	None	1M, 2M
5.a.v	WAC 173-400-040(4)	F	The owner or operator of any emissions unit engaging in materials handling, construction, demolition or other operation which is a source of fugitive emission: (a) If located in an attainment area and not impacting any	RM 9, 22	1M, 2M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			nonattainment area, will take reasonable precautions to prevent the release of air contaminants from the operation.		
5.a.vi	WAC 173-400-040(5)	S	Any producer of an odor, which may unreasonably interfere with any other property owner's use and enjoyment of his property must reduce these odors to a reasonable minimum.	None	None
5.a.vii	WAC 173-400-040(6)	F	No person will cause or permit the emission of any air contaminant if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business	None	2M
5.a.viii	WAC 173-400-040(8)	F	No person will cause or permit the installation or use of any means which conceals or masks an emission of an air contaminant which would otherwise violate any provisions of Chapter 173-400 WAC	None	None
5.a.ix	WAC 173-400-060	F	D&L will not emit particulate matter in excess of 0.1 gr/dscf uncorrected for excess air from general process units	None	1M
5.a.x	WAC 173-400-200	F	No use of excess stack height or dispersion techniques to meet ambient air quality standards or PSD increments except as	None	None

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			allowed under WAC 173-400-200		
5.a.xi	WAC 173-400-205	F	No varying of emissions according to atmospheric conditions or ambient concentrations except as allowed under WAC 173-400-205	None	None
5.a.xii	WAC 173-425 Restriction on Open Burning	F	No outdoor burning, except as allowed by WAC 173-425.	None	None
5.a.xiii	RCW 70A.15.1070	S	Causing air pollution in violation of Chapter 70A.15 RCW is unlawful	None	None
5.a.xiv	40 CFR, Part 82	F	Handling and use of ozone-depleting substances must be in accord with 40 CFR Part 82.	None	None
5.a.xv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 7(h)	F	All EPA notifications and submittals will be sent to the EPA Administrator as specified in applicable Federal Rules and Regulations, particularly 40 CFR 63, Subpart ZZZZZ	None	None
5.a.xvi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 9(b)	S	Legible copies of the Order approving the NOC application will be available to employees in direct operation of the facility and be available for review upon request by Ecology.	None	None

b) Preheater A, Process P3

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.b.i	Order No. 24AQ-E009, Issued July 23, 2024,	F	Fuel used by both preheaters will (A and B)	Annual reports	7M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
	Approval Condition 1(e)		will be natural gas exclusively.		
5.b.ii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(f)	F	The metal charge to the preheaters will contain no more than 0.2 percent foreign material. Foreign materials include oil, grease, and non-ferrous metals. Sorters will remove the foreign material. Dirt mud and rocks are not considered foreign material.		4M
5.b.iii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(g)	F	No existing bag filter or bag filter air handling system can be modified without filing a Notice of Construction application.		None
5.b.iv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 2(a)	F	For both furnace buildings A and B, after initial testing, performance testing will be conducted every five years to determine compliance with the emission limits in Condition 3.	RM5	5M
5.b.v	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(b)	F	The opacity of any baghouse will not exceed ten percent average over a six minute time interval, measured in accordance with Reference 9 by a certified observer.	RM9, 22	1M
5.b.vi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(d)	F	The total particulate matter (filterable and condensable) grain loading will be less than 0.010 grains per dry standard cubic foot measured in accordance condition 8(e) (EPA Method 5).	RM5, 9, 22	1M, 5M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.b.vii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(a)	F	Monitors of the A side baghouse will include but are not limited to pressure gauges on compressed air cleaning systems.		3M
5.b.viii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(b)	F	A magnehelic or other indicator of pressure drop across the baghouse, or other manufacturer's recommend bag failure indicator will be installed and properly maintained. The indicator will produce an audible or visual signal in a location occupied by personnel when the equipment is operating.		3M
5.b.ix	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(c)	F	Access ports will be in the ductwork directly up and down stream of the baghouse to measure pressure and airflow. The ports will be accessible ½" in diameter and safely accessible.		None
5.b.x	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 5	F	O&M manuals will be developed and maintained for baghouses.		3M
5.b.xi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(a)	F	Monthly records will be kept of natural gas consumption.		7M
5.b.xii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(i)	F	Records must be kept of maintenance and inspection of control devices.		3M

c) Electric Induction Furnace, ABB Holding Furnace and Metal Alloying, Process P4

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.c.i	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(a)	F	The production output of the facility will not exceed 50,000 tons per 12 months; production output of the ABB furnace will not exceed 6,000 tons per year.		7M
5.c.ii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(b)	F	The production output of ductile iron will not exceed 6000 tons per 12 months.		7M
5.c.iii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(g)	F	No existing bag filter or bag filter air handling system can be modified without filing a Notice of Construction application.		None
5.c.iv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 2(a)	F	For both furnace buildings A and B, after initial testing, performance testing will be conducted every five years to determine compliance with the emission limits in Condition 4 below.	RM5	5M
5.c.v	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(b)	F	The opacity of any baghouse will not exceed ten percent average over a six minute time interval, measured in accordance with Reference 9 by a certified observer.	RM9, 22	1M, 5M
5.c.vi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(d)	F	The total particulate matter (filterable and condensable) grain loading will be less than 0.010 grains per dry standard cubic foot measured in accordance condition 8(e) (EPA Method 5).	RM5, 9, 22	1M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.c.vii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(a)	F	The total particulate matter (condensable and filterable) mass emission rate will not exceed 0.860 lbs/hr.	RM9, 22	1M, 5M
5.c.viii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(a)	F	Monitors of the A side baghouse will include but are not limited to pressure gauges on compressed air cleaning systems.		3M
5.c.ix	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(b)	F	A magnehelic or other indicator of pressure drop across the baghouse, or other manufacturer's recommend bag failure indicator will be installed and properly maintained. The indicator will produce an audible or visual signal in a location occupied by personnel when the equipment is operating.		3M
5.c.x	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(c)	F	Access ports will be in the ductwork directly up and downstream of the baghouse to measure pressure and airflow. The ports will be accessible one half inch in diameter and safely accessible.		None
5.c.xi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 5	F	O&M manuals will be developed and maintained for baghouses.		3M
5.c.xii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(b)	F	Records will be kept for 60 months of the gray and ductile iron produced by each furnace.		7M
5.c.xiii	Order No. 24AQ-E009, Issued July 23, 2024,	F	Records will be kept for 60 months of the tons of		7M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
	Approval Condition 6(c)		magnesium consumed by each furnace.		
5.c.xiv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(i)	F	Records must be kept of maintenance and inspection of control devices.		3M
5.c.xv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(j)	F	Records will be kept for consecutive 12-month total quantities of the tons of gray and ductile iron produced by each furnace.		7M
5.c.xvi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 7(c),(d), and (e)	F	An annual report of total gray and ductile iron produced will be submitted annually within 30 days of the end of the calendar year which contains total quantities of gray iron produced, ductile iron produced, no-bake cores produced, green sand handled, and an emissions inventory for all annual emissions from the facility.		7M
5.c.xvii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(e)	F	The total particulate matter (condensable and filterable) mass emission rate from the exhaust of the A-side melt furnace baghouse must not exceed 0.500 lbs/hr for the Pentiction 6-14-24k or 0.860 lb/hr for the Fabric Filter Air Systems, Model number 196-10 TRLOD, measured in accordance with condition 8(e).	RM9, 22	1M

d) Pouring and Cooling A, Process P5

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.d.i	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 2(a)	F	For buildings A and B, pouring, cooling and shakeout operations will be tested every five years for compliance with emission limits for carbon monoxide and particulate matter as set in Condition 4.	RM10	6M
5.d.ii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(k)	F	The cumulative carbon monoxide mass emission rate from both A-side pouring and cooling exhaust stacks, A-side shakeout baghouse (model 630-10), A-side pouring and cooling baghouse (model CS40000), and B-side Sand Processing baghouse (model CS40000) must not exceed 48.95 lb/hr measured in accordance with Condition 8.g.	RM10	6M

e) Sand Handling Process P12, P13, P14, and P15

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.e.i	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(c)	F	The handling of greensand will not exceed 483,825 tons per 12-month period.		7M
5.e.ii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(d)	F	The handling of no bake cores will not exceed 2,917 tons per 12-month period.		7M
5.e.iii	Order No. 24AQ-E009, Issued July 23, 2024,	F	No existing bag filter or bag filter air handling system can be modified		None

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
	Approval Condition 1(g)		without first filing a Notice of Construction application with Ecology.		
5.e.iv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(h)	F	The sand system will only use greensand and additives. The binder will be volclay sparser (bentonite). No chemical or organic binders will be used.		7M
5.e.v	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 2(a)	F	For both furnace buildings A and B, pouring, cooling and shakeout operations will be tested every five years for compliance with emissions limits for carbon monoxide and particulate matter as set in Condition 3.	RM5	5M
5.e.vi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(b)	F	The opacity of any fugitive emissions from foundry operations will not exceed 20 percent for more than three minutes in any hour, measured in accordance with Reference Method 9 by a certified observer.	RM9, 22	1M
5.e.vii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(d)	F	The total particulate matter (filterable and condensable) grain loading will be less than 0.010 grains per dry standard cubic foot measured in accordance condition 8(e) (EPA Method 5).	RM5, 9, 22	1M, 5M
5.e.viii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(a)	F	Monitors of the A side baghouses will include but are not limited to pressure		3M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			gauges on compressed air cleaning systems.		
5.e.ix	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(b)	F	A magnehelic or other indicator of pressure drop across the baghouse, or other manufacturer's recommended bag failure indicator will be installed and properly maintained. The indicator will produce an audible or visual signal in a location occupied by personnel when the equipment is operating.		3M
5.e.x	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(c)	F	Access ports will be in the ductwork directly up and downstream of the baghouse to measure pressure and airflow. The ports will be accessible ½" in diameter and safely accessible.		None
5.e.xi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 5	F	O&M manuals will be developed and maintained for baghouses.		3M, 7M
5.e.xii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(e)	F	Records of monthly tons of each type of binder or additive used in sand.		7M
5.e.xiii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(f)	F	Records of monthly quantities of additives (including sea coal) used in sand molds and cores.		7M
5.e.xiv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(g)	F	Records of monthly quantities of Greensand handled at the facility.		7M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.e.xv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(h)	F	Monthly quantities of sand purchased for producing No-bake Cores.		7M
5.e.xvi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(i)	F	Logs of maintenance and inspection control devices.		3M, 7M
5.e.xvii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(j)	F	Records of consecutive 12-month quantities of greensand and no bake cores handled.		3M, 7M
5.e.xviii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 7(d)	F	An annual report of greensand handled will be submitted annually within 30 days of the end of the calendar year.		7M

f) Shakeout, Process P6

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.f.i	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(g)	F	No existing bag filter or bag filter air handling system can be modified without filing a Notice of Construction application.		None
5.f.ii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 2(a)	F	For buildings A and B, pouring, cooling and shakeout operations will be tested every five years for compliance with emission limits for carbon monoxide and particulate matter as set in Condition 3.	RM5, 10	5M, 6M
5.f.iii	Order No. 24AQ-E009, Issued July 23, 2024,	F	The cumulative carbon monoxide mass emission rate from both A-side	RM10	6M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
	Approval Condition 3(k)		pouring and cooling exhaust stacks, A-side shakeout baghouse (model 630-10), A-side pouring and cooling baghouse (model CS40000), and B-side Sand Processing baghouse (model CS40000) must not exceed 48.95 lb/hr measured in accordance with Condition 8.g.		
5.f.iv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(b)	F	The opacity of any fugitive emissions from foundry operations will not exceed 10 percent average for more over a six-minute time interval, and measured with Reference Method 9 by a certified observer	RM9, 22	1M
5.f.v	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(d)	F	The total particulate matter (filterable and condensable) grain loading will be less than 0.010 grains per dry standard cubic foot measured in accordance condition 8(e) (EPA Method 5).	RM5, 9, 22	1M
5.f.vi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(a)	F	Monitors of the A side baghouses will include but are not limited to pressure gauges on compressed air cleaning systems.		3M
5.f.vii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(b)	F	A magnehelic or other indicator of pressure drop across the baghouse, or other manufacturer's recommend bag failure indicator will be installed		3M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			and properly maintained. The indicator will produce an audible or visual signal in a location occupied by personnel when the equipment is operating.		
5.f.viii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(c)	F	Access ports will be in the ductwork directly up and downstream of the baghouse to measure pressure and airflow. The ports will be accessible ½" in diameter and safely accessible.		None
5.f.ix	Order No. 24AQ-E009, Issued July 23, 2024 Approval Condition 5	F	O&M manuals will be developed and maintained for baghouses.		3M, 7M
5.f.x	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(i)	F	Records must be kept of maintenance and inspection of control devices.		3M, 7M

g) Shotblasting (Throughblast A), Process P7

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.g.i	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(g)	F	No existing bag filter or bag filter air handling system can be modified without filing a Notice of Construction application.	None	None
5.g.ii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 2(a)	F	For both furnace buildings A and B, after initial testing, performance testing will be conducted every five years to determine compliance with the emission limits for carbon monoxide and	RM5	5M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			particulate matter as set in Condition 3.		
5.g.iii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(b)	F	The opacity of any baghouse will not exceed ten percent averaged over a six minute time interval, measured in accordance with Reference 9 by a certified observer.	RM9, 22	1M
5.g.iv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(d)	F	The total particulate matter (filterable and condensable) grain loading will be less than 0.004 grains per dry standard cubic foot measured in accordance Condition 8(e) (EPA Method 5).	RM5, 9, 22	1M
5.g.v	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(a)	F	Monitors of the A side baghouses will include but are not limited to pressure gauges on compressed air cleaning systems.		3M
5.g.vi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(b)	F	A magnehelic or other indicator of pressure drop across the baghouse, or other manufacturer's recommend bag failure indicator will be installed and properly maintained. The indicator will produce an audible or visual signal in a location occupied by personnel when the equipment is operating.		3M
5.g.vii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(c)	F	Access ports will be in the ductwork directly up and downstream of the baghouse to measure pressure and airflow. The ports will be accessible ½"		None

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			in diameter and safely accessible.		
5.g.viii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 5	F	O&M manuals will be developed and maintained for baghouses.		3M, 7M
5.g.ix	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(i)	F	Records must be kept of maintenance and inspection of control devices.		3M, 7M

h) Grinding, Process P8

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.h.i	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(g)	F	No existing bag filter or bag filter air handling system can be modified without filing a Notice of Construction application.		None
5.h.ii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 2(a)	F	For both furnace buildings A and B, after initial testing, performance testing will be conducted every five years to determine compliance with the emission limits for carbon monoxide and particulate matter as set in condition 3.	RM5	5M
5.h.iii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(b)	F	The opacity of any baghouse will not exceed ten percent averaged over a six minute time interval, measured in accordance with Reference 9 by a certified observer.	RM9, 22	1M
5.h.iv	Order No. 24AQ-E009, Issued July 23,	F	The total particulate matter (filterable and	RM5, 9, 22	1M, 5M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
	2024, Approval Condition 3(d)		condensable) grain loading will be less than 0.010 grains per dry standard cubic foot measured in accordance Condition 8(e) (EPA Method 5).		
5.h.v	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(l)	F	The total particulate matter (filterable and condensable) mass emission rate will not exceed 0.142 lbs/hr	RM5, 202	1M, 5M
5.h.vi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(a)	F	Monitors of the A side baghouses will include but are not limited to pressure gauges on compressed air cleaning systems.		3M
5.h.vii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(b)	F	A magnehelic or other indicator of pressure drop across the baghouse, or other manufacturer's recommend bag failure indicator will be installed and properly maintained. The indicator will produce an audible or visual signal in a location occupied by personnel when the equipment is operating.		3M
5.h.viii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(c)	F	Access ports will be in the ductwork directly up and downstream of the baghouse to measure pressure and airflow. The ports will be accessible ½" in diameter and safely accessible.		None
5.h.ix	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(f)	F	The dust collector will have a differential pressure gauge (scaled in inches of water column)		None

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			installed across the inlet and outlet of the exhaust. The range of pressure drop readings that indicate proper filter operation will be incorporated into the facility O&M manual as well as procedures to follow in the event the gauge indicates operation is outside those ranges.		
5.h.x	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 5	F	O&M manuals will be developed and maintained for baghouses.		3M, 7M
5.h.xi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(i)	F	Records must be kept of maintenance and inspection of control devices		3M, 7M

i) Painting and Coating, Process P10

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.i.i	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(i)	F	Air being drawn from the paint booth will be filtered prior to being exhausted. Each booth exhaust filtration system will be capable of at least 98 percent capture efficiency.		None
5.i.ii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(j)	F	All paint spray guns used will be High Volume Low Pressure (HVLV) type spray gun, or spray guns with equal or greater transfer efficiency.		None
5.i.iii	Order No. 24AQ-E009, Issued July 23,	F	All spray gun cleaning will be conducted in a closed		

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
	2024, Approval Condition 1(k)		system or inside the paint booths.		
5.i.iv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(d)	F	The paint booth will have in place, an electrical interlock (or other fail-safe device) or an operational requirement as specified in the O&M manual to prevent booth operation in the event the respective exhaust filtration system is not running.		
5.i.v	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(e)	F	The paint booth will have a differential pressure gauge (scaled in inches of water column) installed across the inlet and outlet of the exhaust filter. The range of pressure drop readings that indicate proper filter operation will be incorporated into the facility O&M manual as well as procedures to follow in the event the gauge indicates operation is outside those ranges.		
5.i.vi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 5	F	O&M manuals will be developed and maintained for baghouses.		3M, 7M
5.i.vii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(i)	F	Records must be kept of maintenance and inspection of control devices.		3M, 7M
5.i.viii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(c)	S	Opacity of the exhaust of the paint booth must not exceed five percent, averaged over a six-minute time interval, and	RM9, 22	1M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			measured in accordance with Reference Method 9 by a certified observer.		

j) Plant B, Preheater B, Process P3

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.j.i	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(e)	F	Fuel used by both preheaters (A and B) will be natural gas exclusively.		7M
5.j.ii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(f)	F	The metal charge to the preheaters will contain no more than 0.2 percent foreign material. Foreign material includes oil, grease, and non-ferrous metals. Sorters will remove the foreign material. Dirt mud and rocks are not considered foreign material.		4M
5.j.iii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(g)	F	No existing bag filter or bag filter air handling system can be modified without filing a Notice of Construction application.		None
5.j.iv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 2(a)	F	For both furnace buildings A and B, after initial testing, performance testing will be conducted every five years to determine compliance with the emission limits in Condition 3.	RM5	5M
5.j.v	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(b)	F	The opacity of any baghouse will not exceed ten percent averaged over a six minute time interval,	RM9, 22	1M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			measured in accordance with Reference 9 by a certified observer.		
5.j.vi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(f)	F	The total particulate matter (filterable and condensable) grain loading will be less than 0.004 grains per dry standard cubic foot measured in accordance condition 8(e).	RM9, 22	1M, 5M
5.j.vii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(g)	F	The total particulate matter (filterable and condensable) mass emission rate from the exhaust of the B-side preheater baghouse (MAC, Model 144RPT224) must not exceed 0.411 lb/hr measured in accordance with condition 8(e).	RM9, 22	1M, 5M
5.j.viii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(b)	F	A magnehelic or other indicator of pressure drop across the baghouse, or other manufacturer's recommend bag failure indicator will be installed and properly maintained. The indicator will produce an audible or visual signal in a location occupied by personnel when the equipment is operating.		3M
5.j.ix	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(c)	F	Access ports will be in the ductwork directly up and downstream of the baghouse to measure pressure and airflow. The ports will be accessible ½" in diameter and safely accessible.		None

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.j.x	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 5	F	O&M manuals will be developed and maintained for baghouses.		3M
5.j.xi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(a)	F	Monthly records will be kept of natural gas consumption.		7M
5.j.xii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(i)	F	Records must be kept of maintenance and inspection of control devices.		3M

k) Plant B Electric Induction Furnace and Metal Alloying, Process P4

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.k.i	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(a)	F	The production output of the facility will not exceed 50,000 tons per 12 months; production output of the ABB furnace will not exceed 6,000 tons per year.		7M
5.k.ii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(b)	F	The production output of ductile iron will not exceed 6000 tons per 12 months.		7M
5.k.iii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(g)	F	No existing bag filter or bag filter air handling system can be modified without filing a Notice of Construction application.		None
5.k.iv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 2(a)	F	For both furnace buildings A and B, after initial testing, performance testing will be conducted every five years to determine compliance with	RM5	5M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			the emission limits in Condition 3 below.		
5.k.v	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(b)	F	The opacity of any baghouse will not exceed ten percent averaged over a six minute time interval, measured in accordance with Reference 9 by a certified observer.	RM9, 22	1M, 5M
5.k.vi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(f)	F	The total particulate matter (filterable and condensable) grain loading will be less than 0.004 grains per dry standard cubic foot measured in accordance condition 8(e).	RM9, 22	1M, 5M
5.k.vii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(g)	F	The total particulate matter (condensable and filterable) mass emission rate will not exceed 0.411 lbs/hr.	RM5, 9, 22	1M, 5M
5.k.viii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(b)	F	A magnehelic or other indicator of pressure drop across the baghouse, or other manufacturer's recommend bag failure indicator will be installed and properly maintained. The indicator will produce an audible or visual signal in a location occupied by personnel when the equipment is operating.		3M
5.k.ix	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(c)	F	Access ports will be in the ductwork directly up and downstream of the baghouse to measure pressure and airflow. The ports will be accessible one		None

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			half inch in diameter and safely accessible.		
5.k.x	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 5	F	O&M manuals will be developed and maintained for baghouses.		3M
5.k.xi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(b)	F	Records will be kept for 60 months of the gray and ductile iron produced by each furnace.		7M
5.k.xii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(c)	F	Records will be kept for 60 months of the tons of magnesium consumed by each furnace.		7M
5.k.xiii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(i)	F	Records must be kept of maintenance and inspection of control devices.		3M
5.k.xiv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(j)	F	Records will be kept for consecutive 12-month total quantities of grey iron produced, ductile iron produced, no-bake cores produced, and greensand handled.		7M
5.k.xv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 7(c), (d), & (e)	F	An annual report of total gray and ductile iron produced will be submitted annually within 30 days of the end of the calendar year which contains total quantities of gray iron produced, ductile iron produced, no-bake cores produced, green sand handled, and an emissions inventory for all annual emissions from the facility.		7M

l) Plant B Sand Handling, Shotblasting (Table Blast B), Pouring and Cooling, Processes P12, P13, P14, P15, P6, P7.

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.l.i	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(c)	F	The handling of greensand will not exceed 483,825 tons per 12-month period.		7M
5.l.ii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(d)	F	The production of no bake cores will not exceed 2,917 tons per 12-month period.		7M
5.l.iii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(g)	F	No existing bag filter or bag filter air handling system can be modified without filing a Notice of Construction application.		None
5.l.iv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 1(h)	F	The sand system will only use greensand and additives. The binder will be volclay sparser (bentonite). No chemical or organic binders will be used.		7M
5.l.v	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 2(a)	F	For buildings A and B, pouring, cooling and shakeout operations will be tested every five years for compliance with emission limits for carbon monoxide and particulate matter as set in Condition 3.		5M
5.l.vi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(b)	F	The opacity of any baghouse will not exceed ten percent averaged over a six minute time interval, measured in accordance with Reference 9 by a certified observer.		1M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.l.vii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(f)	F	The total particulate matter (filterable and condensable) grain loading will be less than 0.004 grains per dry standard cubic foot measured in accordance Condition 8(e).		1M, 5M
5.l.viii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(i)	F	The total particulate matter (filterable and condensable) mass emission rate from the exhaust of the B-side shake-out baghouse (Wheelabrator, Model 168 JET III) will not exceed 1.71 lb/hr measured in accordance with condition 8(e).		1M, 5M
5.l.ix	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(j)	F	The total particulate matter (filterable and condensable) mass emission rate from the exhaust of the B-side Sand Processing baghouse (Wheelabrator, Model # 168 JET III) will not exceed 1.71 lb/hr measured in accordance with condition 8(e).		1M, 5M
5.l.x	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 3(k)	F	The cumulative carbon monoxide mass emission rate from both A-side pouring and cooling exhaust stacks, A-side shakeout baghouse (model 630-10), A-side pouring and cooling baghouse (model CS40000), and B-side Sand Processing baghouse (model CS40000)		6M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			must not exceed 48.95 lb/hr measured in accordance with Condition 8.g.		
5.l.xi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(b)	F	A magnehelic or other indicator of pressure drop across the baghouse, or other manufacturer's recommended bag failure indicator will be installed and properly maintained. The indicator will produce an audible or visual signal in a location occupied by personnel when the equipment is operating.		3M
5.l.xii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 4(c)	F	Access ports will be in the ductwork directly up and downstream of the baghouse to measure pressure and airflow. The ports will be accessible ½" in diameter and safely accessible.		None
5.l.xiii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 5	F	O&M manuals will be developed and maintained for baghouses.		3M, 7M
5.l.xiv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(e)	F	Records of monthly tons of each type of binder or additive used in sand.		7M
5.l.xv	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(f)	F	Records of monthly quantities of additives (including sea coal) used in sand molds and cores.		7M
5.l.xvi	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(g)	F	Records of monthly quantities of Greensand handled at the facility.		7M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.I.xvii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(h)	F	Monthly quantities of sand purchased for producing No-bake Cores.		7M
5.I.xviii	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(i)	F	Logs of maintenance and inspections of control devices.		3M, 7M
5.I.xix	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 6(j)	F	Records of consecutive 12-month quantities of greensand and no bake cores handled.		3M, 7M
5.I.xx	Order No. 24AQ-E009, Issued July 23, 2024, Approval Condition 7(d)	F	Total annual quantities of grey iron produced, ductile iron produced, no-bake cores produced, and greensand handled.		7M

6) Monitoring, Recordkeeping, and Reporting Requirements

a) 1M Visible Emissions

The facility will meet the requirements given in a) and if triggered, the facility will meet the requirements given in b) and/or c).

- i) The facility will perform weekly inspections during daylight hours while the facility is operating for the purpose of observing points of visible emissions and PM emissions from the following emission points:

- Emission points (5.2-5.9, 5.10-5.12)

The weekly inspections will be conducted in accordance with EPA Method 22 as follows:

- (1) Each inspection will be conducted from a location(s) with a clear view of each emission source where the sun is not directly in the observer's eyes. The inspection location(s) will be at least 15 feet but not more than 0.25 miles from the emission source.
- (2) The observer will be educated in the general procedures for determining the presence of visible emissions (i.e., effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, and observer position relative to the source and sun).

- (3) Each inspection will consist of a minimum 15-second visual observation of each emission source to identify those emission sources which exhibit visible emissions.
 - (4) Records will be kept of each inspection, including the name of the observer, the date and time of the inspection, and the observations made during the inspection. Records will be kept in accordance with 7M Recordkeeping – Records Retention, and, upon request, such records will be made available for inspection by Ecology staff or other authorized representatives. If visible emissions are not observed from any emission source at the facility during the weekly inspection, no additional action is required. If visible emissions are observed from any emission source, the facility will take further action according to b).
- ii) If visible emissions are observed during an inspection or are otherwise observed by the inspector, the facility will verify and certify that:
- (1) The visible emissions or PM emissions are not the result of equipment malfunction, and the equipment, if any, from which the emissions are released, is performing its normal, designed function.
 - (2) The air pollution control equipment, if any, is being operated properly in accordance with normal operating procedures.
 - (3) If the visible emissions are the result of fugitive emissions, reasonable precautions are being taken to minimize emissions. If b) 1, 2, and/or, 3 are not being met, corrective action will be taken as soon as possible, but no later than three days from discovery, to correct the problem.
 - (4) The facility will keep records of any verifications made regarding b) 1, 2, and/or 3 and a description of any corrective action taken. Records will be kept in accordance with 7M Recordkeeping – Records Retention, and, upon request, such records will be made available for inspection by Ecology staff or other authorized representatives. If b) 1, 2, and 3, are being met, but visible emissions are still observed, the facility will take further action according to c).
- iii) If visible emissions are still observed and b) 1), 2), and 3) are being met, the facility will perform testing according to c) 1 and will take corrective action to identify the root cause.
- (1) As a means of demonstrating compliance with the visible emissions standard(s), the facility will perform, or have performed, EPA Method 9 on the source of the visible emissions. The test will occur within a reasonable timeframe but no later than 1 working day after discovery of the emissions. If the visible emissions exceed the applicable standard, the facility will take timely and appropriate corrective action (as soon as possible, but within 24 hours) to address the problem. The results of the Method 9 test will be maintained in accordance with 7M Recordkeeping – Records Retention.

b) 2M Inspections and Complaints

The facility will meet the requirements given in a) and b), and if triggered, the facility will meet the requirements given in c).

- i) The facility will perform weekly inspections of the facility during daylight hours while the facility is in operation to verify that each requirement for which this MRRR is specified in the "MRRR Reference" column in the above tables is being met. Records will be kept of each inspection, including the name of the observer, the date and time of the inspection, and the observations made during the inspection. Records will be kept in accordance with 7M Recordkeeping – Records Retention.
- ii) The facility will record and investigate complaints received regarding air quality problems. Complaints will be investigated as soon as possible, but no later than 24 hours of receipt or by the end of the first regular business day during which the complaint was received, whichever is later. Records will be kept of each complaint investigation, including the date and time that the complaint was received, the date and time of the complaint investigation, and observations made during the investigation. Records will be kept in accordance with 7M Recordkeeping – Records Retention.
- iii) If potential violations of the requirement(s) are observed during the weekly inspections, as part of the complaint investigation, and/or at any other time, the facility will take timely and appropriate corrective action. Records will be kept of all correction action(s) taken. Records will be kept in accordance with 7M Recordkeeping – Records Retention.
- iv) The following are considered to be reasonable precautions; recognized good practices and procedures; and effective control apparatus and measures. Depending on the air quality problem being addressed, it may be necessary to implement one, several, or all of the precautions, practices, and procedures.
 - (1) Reasonable precautions to prevent PM or fugitive dust from becoming airborne include, but are not limited to:
 - (a) Using water or chemical dust suppressants on PM containing materials prior to and during activities that may release PM into the air. Re-application may be required periodically to maintain effectiveness.
 - (b) Minimizing activity during high winds, if the winds are likely to cause the release of PM into the air.
 - (c) Using covered chutes, covered containers, and/or PM collection and control equipment when handling, transferring, and/or storing PM containing materials.

- (d) Minimizing the free fall distance, for example, drop height, of PM containing materials at transfer points such as the end of conveyors, front end loader buckets, loading spouts, etc.
 - (e) Maintaining adequate freeboard and/or covering loads when transporting PM containing material.
 - (f) Minimizing exposed areas of PM containing materials such as storage piles, graded surfaces, etc. to minimize releases to air.
 - (g) Limit vehicle speed to less than 15 miles per hour on unpaved areas.
- (2) Reasonable precautions to prevent tracking of PM onto paved public roadways include, but are not limited to:
- (a) Graveling unpaved traveled surfaces. Gravel may need to be reapplied periodically to maintain effectiveness.
- (3) Reasonable precautions to prevent release of air contaminants, other than PM, include, but are not limited to:
- (a) Using materials that decrease air contaminant emissions to the air, e.g., low-VOC materials and/or water based materials.
 - (b) Using solvent containing materials with lower vapor pressures.
 - (c) Keeping unused or partially used containers of organic solvent containing materials closed, except when in use.
 - (d) Cleaning up all spills of organic solvent containing materials upon discovery and keeping the waste materials in closed containers.
 - (e) Keeping all disposable materials which contain organic solvents in closed containers.
- (4) Recognized good practices and procedures and effective control apparatus and measures to reduce odors include, but are not limited to:
- (a) Keeping odorous materials in closed containers or confined within a building.
 - (b) Using ventilation systems which direct odor bearing gases away from neighboring residences and businesses.
 - (c) Using materials which release less odorous compounds.
 - (d) Disposing of odorous, or potentially odorous, materials promptly.

- (e) Operating and maintaining equipment and processes in a manner that minimizes odors.

c) **3M Operation and Maintenance(O&M) Plans**

The facility will follow the operation and maintenance plans for the baghouses and other pollution control equipment.

At a minimum, the O&M plans will address the following:

- i) Routine maintenance activities required to keep the baghouses in proper operating condition with regard to minimizing emissions, including manufacturer recommended operation and maintenance procedures, a description of recordkeeping activities including those records being kept, method(s) of recordkeeping, and length of time that records are to be kept.
- ii) Maintenance records will be kept for equipment necessary for minimizing or otherwise reducing emissions from the facility baghouse(s).
- iii) Required records will be kept for a minimum of five years, and include information required in Condition 7M Recordkeeping – Records Retention.

d) **4M Preheater Administrative Control Plans**

The facility will maintain an administrative control plan for minimizing contaminants from entering the preheaters:

- i) The facility will only purchase materials meeting an industry accepted specification for ensuring clean scrap iron.
- ii) Operators responsible for loading and transferring scrap into the preheaters will receive annual training on the identification and removal of foreign contaminants.
- iii) Raw material and internally generated scrap for re-melt will be inspected through transfer and loading operations of the feedstock to the preheaters.
- iv) Records will be maintained of operator training on item b) above.

e) **5M Particulate Matter Testing**

The facility will conduct particulate matter testing on each baghouse from a significant emission unit once every five years.

- i) Filterable PM per Title 40 CFR 60, Appendix A, Method 5.
- ii) Filterable and condensable PM per 40 CFR 60, Appendix A, Methods 5 and 40 CFR 51, Appendix M, Method 202.
- iii) Number of Test Runs – Performance or compliance testing of each piece of pollution control equipment will consist of three separate runs of at least 60-minutes each.
- iv) Throughput during Testing – During testing, the process will be operated at a minimum of 90 percent of rated capacity for equipment with less than 12 months operating history, or 90 to 110 percent of the maximum process rate recorded

during the preceding 12 month period for equipment operated for 12 months or more. Operation of the process during testing outside of the specified range may be proposed but may result in an operational restriction that will be amended to this Approval Order.

- v) Submittal of Performance Test Plan – A written test protocol that includes a description of the equipment to be tested, the process and control device operating information to be collected during the test, and the sampling and analytical method(s) proposed, will be submitted to Ecology at least 30 calendar days prior to the start of any performance test.
 - vi) Notification of Inability to Conduct Performance Test – If the permittee is unable to conduct any performance test as scheduled, Ecology will be notified at least 24-hours before the test at the address listed in 7M Recordkeeping – Records Retention, or via telephone at 509-329-3400.
 - vii) Plant Operator during Testing – The plant process equipment will be operated and controlled by normal plant operators during the period when the performance testers are on-site to conduct testing and during actual testing.
 - viii) Performance or Compliance Testing Results – The results of all initial performance testing and all other periodic performance testing will be sent to the address listed in 7M Recordkeeping – Records Retention. One copy of the completed test report will be submitted no later than 60-days after the last day of the testing.
- f) **6M Carbon Monoxide Testing**

The facility will conduct testing for carbon monoxide from significant emissions units identified in the NOC approval using the following method:

- i) All CO tests will be performed using the test method in 40 CFR 60, Appendix A, Method 10.
- ii) Number of Test Runs – Performance or compliance testing of each piece of pollution control equipment will consist of three separate runs of at least 60-minutes each.
- iii) Throughput during Testing – During testing, the process will be operated at a minimum of 90 percent of rated capacity for equipment with less than 12 months operating history, or 90 to 110 percent of the maximum process rate recorded during the preceding 12 month period for equipment operated for 12 months or more. Operation of the process during testing outside of the specified range may be proposed but may result in an operational restriction that will be amended to this Approval Order.
- iv) Submittal of Performance Test Plan – A written test protocol that includes a description of the equipment to be tested, the process and control device operating information to be collected during the test, and the sampling and analytical method(s) proposed, will be submitted to Ecology at least 30 calendar days prior to the start of any performance test.

- v) Notification of Inability to Conduct Performance Test – If the permittee is unable to conduct any performance test as scheduled, Ecology will be notified at least 24-hours before the test at the address listed in 7M Recordkeeping – Records Retention, or via telephone at 509-329-3400.
- vi) Plant Operator during Testing – The plant process equipment will be operated and controlled by normal plant operators during the period when the performance testers are on-site to conduct testing and during actual testing.
- vii) Performance or Compliance Testing Results – The results of all initial performance testing and all other periodic performance testing will be sent to the address listed in 7M Recordkeeping – Records Retention. One copy of the completed test report will be submitted no later than 60-days after the last day of the testing.

g) 7M Recordkeeping – Records Retention

The facility will collect monthly records that includes the following information for the previous month:

- i) Monthly natural gas consumption for the facility.
- ii) Monthly tons of each type of gray and ductile iron produced by each furnace.
- iii) Monthly tons of magnesium consumed.
- iv) Monthly volume of water added to each cooling tower, composition and quantity of additives.
- v) Monthly tons of each type of binder or additives used in the sand.
- vi) Monthly quantities and types of additives (including sea coal) used in the sand molds and cores.
- vii) Monthly quantities of greensand handled at the facility.
- viii) Monthly quantities of sand purchased for producing no bake cores.
- ix) Logs of maintenance and inspections of control devices.
- x) Monthly records of consecutive 12-month total quantities of grey iron produced, ductile iron produced, no bake cores produced, and greensand handled.
- xi) The facility will maintain copies of all records for a minimum of five years.
- xii) The facility will complete an annual report and will submit the report within 30 days of the end of each calendar year.
- xiii) The facility will review 12 month rolling production limits and analyze monthly usage records to ensure that production limits will be maintained below production thresholds.
- xiv) An annual report will be prepared and submitted to Ecology within 30 days of the end of the calendar year which contains the following:

(1) Total annual quantities of grey iron produced, ductile iron produced, no-bake cores produced, and greensand handled.

(2) An emission inventory for all annual emissions from the facility.

xv) All Ecology Air Quality notifications and submittals will be sent to:

Washington State Department of Ecology

Air Quality Program

4601 N. Monroe St.

Spokane, WA 99205-1295

OR AS DIRECTED

7) Permit Shield Conditions

a) Permit Shield

Compliance with the terms of this Title V permit will be deemed compliance with the applicable requirements upon which that condition is based, as of the date of permit issuance. The permit shield does not apply to any insignificant emissions units or activity designated under WAC 173-401-530.

b) Inapplicable or Exempt Requirements

The requirements shown in Table 7.1, as of the date of permit issuance, have been determined not to apply to the source, or to the specific emission units or activities indicated. Commencing the date of permit issuance, the permit shield will cover the requirements so identified. Applicability of a requirement may be triggered by a future action or emissions increase.

c) Exclusions

Nothing in this section or in any Chapter 401 permit will alter or affect the following:

- i) The provisions of Section 303 of the FCAA (emergency orders), including the authority of the administrator under that section
- ii) 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.
- iii) The applicable requirements of the acid rain program, consistent with Section 408(a) of the FCAA.
- iv) The ability of EPA to obtain information from a source pursuant to Section 114 of the FCAA.
- v) The ability of the permitting authority to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in Chapter 252, Laws of 1993. [WAC 173-401-640]

- d) **Table 7(i) Non-Applicability:** The following table includes only requirements for which inapplicability is based on a determination or comparison of size, age, emissions or other characteristic of the emission unit with the applicability criteria in the requirement. Requirements which are subject to terms of this permit, requirements which are inherently inapplicable (i.e., the source is not in the category subject to a regulation), or requirements which apply only to regulatory agencies are not included.

Emission Unit	Non-Applicable Regulation / Citation	Description of Non-Applicable Regulation	Basis of Non-Applicability
Facility	WAC 173-490	Emission Standards and Control Measures for Sources Emitting VOC	WAC 173-490-025(2) specifies this rule applies only in non-attainment areas.
Facility	40 CFR 82 Subpart B	Stratospheric Ozone Protection: Servicing of Motor Vehicles Air Conditioners	D&L does not service motor vehicle air conditioners.
Facility	40 CFR 63, Subpart EEEEE	Iron and Steel Foundries: National Emissions Standards for Hazardous Air Pollutants	D&L is not a Major Source for HAPs.

Attachment 1

1) Emission Unit Descriptions

The following emission units are subject to the emission limitations and work practice requirements in sections 5.2 through 5.12 of the AOP. (from Approval Order 20AQ-E042)

a) Furnace Building A

Process Equipment	Manufacturer/Model	Capacity	Pollution Control Device and Manufacturer	Model
Preheater A	Venetta, serial no. 78200-321	5 Ton/Hour	Fabric Filter Air Systems	196-10 TRLOD
Furnace System A	Inductotherm/Dual Track 3250 (2)	24,000 CFM	Penticton (D&L Foundry Custom)	Penticton 6-14-24k
ABB Furnace	ABB-ITM 6000	2.5 Ton/Hour	No Control	n/a
Sand No. 1 and No. 2	Green Sand Storage and transfer; Casting Shakeout and Sand Transfer	45,000 CFM; Pulse Jet	Baghouse – Fabric Filters Northwest	630-10
Pouring & Cooling (P&C) Exhaust Stack	Custom Built, 61ft tall, 48" dia.	50,000+ cfm blower	None	n/a
P&C Exhaust Stack No. 2	Custom Built, 60ft tall, 48" dia.	60,000 CFM	None	n/a
Through Blast	Wheelabrator BCP	1 Min/Cycle	Baghouse-GMD	270-10-6RA
Sand No. 3 and Cast Cleaning, Grind	Casting Pouring; Main Building	40,000 CFM; Pulse Jet	Baghouse – Fuller Company, Modified by D&L Foundry	CS40000
Clean / Grind	Donaldson Torit	6000 cfm	12 Cartridge filters	DFO 2-12
Preheater A	Venetta, serial# 78200-321	5 Ton/Hour	Fabric Filter Air Systems	196-10 TRLOD
Pattern Shop	Wood Shop	Variable	Baghouse-MicroPulse	49S10-20
Dip Coating	Custom Built/None	4-6 ft/min conveyor speed	None	n/a
Cooling Tower (note: 38-80 lb/yr PM10 total)	Baltimore Aircoil/FXV-643-OM	8.15 MMBTU/hr	Integral Mist Elimination	n/a

b) Furnace Building B

Process Equipment	Manufacturer/Model	Capacity	Pollution Control Device and Manufacturer	Model
Preheater B	Custom Built/None	1,000 lb/min	Baghouse-MAC	144 RPT 224
Furnace System B	Inductotherm/Dual Track 1750 (2)	2.75 Ton/Hour	Baghouse-GMD	270-10-6RA
Table Blast	Wheelabrator M-96	3 Min/Batch	Baghouse-Wheelabrator	168 JET III
Sand Processing Equipment	Custom Built/None	25 Ton/Hour	Baghouse-Wheelabrator	168 JET III
Cooling Tower	SPX/Recold JX70C	3.412 MMBTU/hr	Mist Eliminator	n/a

c) Paint Booth

Process Equipment	Manufacturer/Model	Capacity	Pollution Control Device and Manufacturer	Model
Paint Booth	COL-MET 240" x 84"	20,263 scfm	160 ft ² , 22g/ft ² Filter Bank	n/a
Sanders (6 – electric and pneumatic)	n/a	3,400 cfm	Wheelabrator 8 (SN-147747) dust collector	n/a
Air Makeup Unit (natural gas)	Bessamaire/ MUAJHF3-40TMP-631	0.1-3.5 MMBTU/hr, 40,000 scfm	None	n/a

Attachment 2

1) Insignificant Emission Units

Emission Unit Description	Designation
Asphalt Coating Tank	WAC 173-401-533(x), (y)
Laboratory Operations	WAC 173-401-532(51), (73)
Mill lubricants and hydraulic fluid reservoirs and pumping equipment	WAC 173-401-532(3), (4)
Maintenance gases	WAC 173-401-532(5)
Maintenance and repair	WAC 173-401-532(5), (12), (33), (45), (55), and (74)
Dumpsters	WAC 173-401-532(6), (79)
Repair and maintenance shop vehicle exhaust	WAC 173-401-532(7)
Foundry vents from rooms, buildings and enclosures that contain permitted emission units or activities	WAC 173-401-532(9)
Building openings (doors, windows, etc.)	WAC 173-401-532(9)
Foundry forklifts and trucks	WAC 173-401-532(10)
Cutting torches	WAC 173-401-532(12)
Sweeping, vacuuming, and mopping activities	WAC 173-401-532(32), (35)
Portable drums and totes	WAC 173-401-532(42)
Lawn & landscape activities	WAC 173-401-532(43)
Vehicle maintenance	WAC 173-401-532(45), (77)
Plant air conditioning and refrigerators	WAC 173-401-532(46)
Mill bathrooms and showers	WAC 173-401-532(48), (50)
Mill office activities	WAC 173-401-532(49)
Fire training and firefighting equipment	WAC 173-401-532(52)
Woodworking	WAC 173-401-532(55)
Machining, cutting, and turning operations	WAC 173-401-532(55)
Batteries and battery chargers	WAC 173-401-532(77)
Air compressors, pneumatically operated equipment, and hand tools	WAC 173-401-532(88)
Gasoline storage tank	WAC 173-401-533(2)(c)
Diesel Fuel storage tank	WAC 173-401-533(2)(c)
LPG tank, 1000 gallons	WAC 173-401-533(2)(d)
Water cooling towers (2x)	WAC 173-401-533(2)(m)
Welding operations – average welding rod usage less than threshold of 1 ton/day	WAC 173-401-533(2)(i)

Appendix A: Federal and State Regulation Date Reference List

WAC	F	S	CFR	F	RCW	S
425	X	3/13/2000	52.33	7/1/2025	70A.15.1070	2024
441	X	12/3/2024	60.11	7/1/2025	70A.15.2210	2024
460	X	11/22/2019	60.12	7/1/2025	70A.15.2220	2024
400-035	X	9/16/2018	60.332	7/1/2025	70A.15.2230	2024
400-040	2/24/2020	3/15/2025	60.334	7/1/2025	70A.15.2260	2024
400-050	2/24/2020	3/15/2025	60.335	7/1/2025	70A.15.2270	2024
400-060	2/24/2020	3/15/2025	60.4	7/1/2025	70A.15.2500	2024
400-070	12/28/2023	1/19/2023	60.43	7/1/2025	70A.15.2510	2024
400-075	X	7/1/2016	60.46	7/1/2025	70A.15.2530	2024
400-105	2/24/2020	3/15/2025	60.48	7/1/2025	70A.15.6410	2024
400-107	6/2/1995	9/16/2018	60.49	7/1/2025	70A.15.6420	2024
400-110	9/29/2016	3/15/2025	60.7	7/1/2025	70A.15.9004	2024
400-113	4/29/2015	3/15/2025	60.8	7/1/2025		
400-114	X	3/15/2025	61, subpart M	7/1/2025		
400-171	12/28/2023	3/15/2025	63.6	7/1/2025		
400-200	10/3/2014	2/10/2005	63.7	7/1/2025		
400-205	6/2/1995	3/22/1991	63.8	7/1/2025		
400-560	4/29/2015	12/29/2012	63.9	7/1/2025		
400-720	10/6/2016	1/19/2023	63.10	7/1/2025		
400-820	11/7/2014	12/29/2012	63.455	7/1/2025		
401-200	1/2/2003	3/15/2025	63.7500	7/1/2025		
401-500	1/2/2003	3/15/2025	63.7510	7/1/2025		
401-510	1/2/2003	3/5/2016	63.7515	7/1/2025		
401-520	1/2/2003	11/4/1993	63.7520	7/1/2025		
401-530	1/2/2003	10/17/2002	63.7525	7/1/2025		
401-605	1/2/2003	11/4/1993	63.7540	7/1/2025		
401-610	1/2/2003	11/4/1993	63.7545	7/1/2025		
401-615	1/2/2003	10/17/2002	63.7550	7/1/2025		
401-620	1/2/2003	3/15/2025	63.10880	7/1/2025		
401-625	1/2/2003	11/4/1993	64.3	7/1/2025		
401-630	1/2/2003	3/5/2016	64.4	7/1/2025		
401-640	1/2/2003	11/4/1993	64.6	7/1/2025		
401-650	1/2/2003	11/4/1993	64.7	7/1/2025		
401-705	1/2/2003	11/4/1993	64.8	7/1/2025		
401-710	1/2/2003	10/17/2002	64.9	7/1/2025		
401-720	1/2/2003	11/4/1993	68.36	7/1/2025		
401-722	1/2/2003	10/17/2002	70.6	7/1/2025		
401-724	1/2/2003	3/15/2025	82	7/1/2025		
401-730	1/2/2003	11/4/1993				
401-930	1/2/2003	1/30/1994				
455-100	X	7/1/2023				
455-120	X	7/1/2023				