

Mr. Mark Cravens
Plant Manager
Highland Lakes Quality Casting Inc.
P.O. Box 1119
Marble Falls, Texas 78654

Re: Investing Casting Operations
Marble Falls, Burnet County

Dear Mr. Cravens:

This is in response to your registration request for your facility located at 1405 Trade Street, Marble Falls, Burnet County, under 30 Texas Administrative Code (TAC) Sections 106.183. The information submitted in support of your request has been evaluated and found to be insufficient to determine whether all the requirements of the permit by rule claimed in your registration request have been met. Therefore we cannot confirm your claim of this permit by rule at this time.

Deficiencies are summarized below:

Based on your process description, Permit by Rule 183 is only relevant to your foundry process and does not address your operation in its entirety. At a minimum, the following permits by rule appear to be equally relevant to your operation.

106.221 - Extrusion presses
106.452 - Dry abrasive cleaning
106.312 - Wax melting and applications
106.315 - Sand or Investment molds
106.319 - Foundry Sand Molding Forming equipment

In addition to the process-specific permits by rules, you are also required to demonstrate that you meet the general permit by rule requirements, as presented in 30 TAC §106.4. Relevant TNRCC checklists are available at the TNRCC website. (http://home.tnrcc.state.tx.us/air/nsr_permits/seform.htm) to assist you.

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Please itemize site wide emission sources as well as the emissions associated with all such sources.

You may resubmit, with appropriate corrections, a revised letter and/or a new permit by rule registration request (PI-7) or a permit/amendment application (PI-1). Please include all previously-assigned Texas Natural Resource Conservation Commission Account ID, permit, or permit by rule registration numbers in your new submittal.

You are reminded that Section 382.0518(a) and 382.057 of the Texas Clean Air Act, Texas Health and Safety Code, Chapter 382, provide that a construction permit must be obtained or a permit by rule fully complied with before work is begun on the construction of a new facility or modification of an existing facility that may emit air contaminants.

Your cooperation in this matter is appreciated. If you have any questions concerning this permit by rule, please call Mr. Emmanuel Ndam at (713) 767-3553 or write to him at the Texas Natural Resource Conservation Commission, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Duncan F. Stewart, P.E.
Manager, Permit by Rule/General Operating Permits
Air Permits Division
Texas Natural Resource Conservation Commission

DS/EN/jo

cc: Mr. Barry Kalda, Air Program Manager, Austin.

Air Permits Division MC-162

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