

AECOM 625 West Ridge Pike, Suite E-100 Conshohocken, PA 19428

December 16, 2022

Regional Program Manager PA Department of Environmental Protection Northeast Regional Office 2 Public Square Wilkes-Barre, PA 18711-0790

Subject: VOC RACT 3 Proposal Submission Victaulic Company – Forks Facility Forks Township, Northampton County, PA Title V Operating Permit No. 48-00009

Dear Sir / Madam:

On behalf of Victaulic Company (Victaulic), AECOM Technical Services, Inc. (AECOM) has prepared this submission to satisfy the requirements of 25 Pa. Code 129.96-129.100, Additional RACT Requirements for Major Sources of NOx and VOCs for Victaulic's Forks Facility located at 4901 Kesslersville Road, Easton, PA 18040. The Forks facility is a major source of VOCs and currently operates under Title V Operating Permit 48-00009.

On October 24, 2016 Victaulic submitted a "VOC RACT 2 Proposal" which documented the costs associated with installing VOC controls on source ID's P005 (Pouring / Casting Operations), P008 (Sand Handling / Casting Shakeout) and P016 (Core Room Operations). These three sources were both over the VOC RACT threshold and did not have a promulgated presumptive RACT.

As documented in the October 24, 2016 submittal (included as Attachment B), these three VOC sources consist of high flow, low mass emissions consisting of a multitude of VOC species. These types of streams are generally treated by thermal oxidation or carbon adsorption. Furthermore, as described in their submittal, controlling VOC emission from P005 and P008 would require additional particulate control prior to the VOC control. There are additional significant capital and technological considerations described in the October 24, 2016 submittal; however, the conclusion of that submittal was that there are no control technologies available that are cost effective assuming a RACT benchmark of \$7,000 or less per ton of VOC removed.

Since that October 24, 2016 submittal, there have been no modifications to these sources and no other changes to the facility that would significantly impact (i.e. reduce) the costs associated with the procurement and installation of VOC controls. Victaulic had utilized a cost adjustment factor based on inflation from the Federal Bureau of Labor Statistics (BLS) from 1998 (when the US EPA published its cost estimation tool for the installation of emissions controls) to 2016. This escalation factor was \$1.46 (2016) / \$1.00 (1998). Currently, this escalation factor is \$1.84 (2022 – October)/ \$1.00. Furthermore, the cost of labor has also increased a commensurate factor according to similar BLS data. As a result, Victaulic asserts that its previous RACT II evaluation and conclusions are still valid and that there are no additional VOC controls that can be installed

This submittal includes this cover letter along with the following:

- Attachment A Responsible Official Certification;
- Attachment B October 24, 2016 RACT II Submittal;
- Attachment C RACT III Submittal.



If you have any questions on this application, please do not hesitate to contact Kevin Voit at 610-529-0613 or Kraig Hume, Global Environmental Manager for Victaulic at <u>Kraig.Hume@victualic.com</u> or 610-559-3476

Sincerely,

Kemm W Voit

Kevin Voit Manager, Air Permitting and Compliance Services kevin.voit@aecom.com

Attachment A – Responsible Official Certification

VOC RACT 3 Proposal Submission Victaulic Company – Forks Facility Forks Township, Northampton County, PA Title V Operating Permit No. 48-00009

Certification of	Truth, Accuracy and Completeness by a Response	sible Of	ficial
official having pr	ject to the penalties of Title 18 Pa. C.S.A. Section 4904 imary responsibility for the design and operation of th ided in this application is true, accurate, and complete sonable inquiry.	e facilitie	es to which this submittal applies and that the
(Signed)	Timothy E. Martin sessesable200435	Date:	12/16/2022
Name (Typed):	Timothy E. Martin	Title:	VP US Operations
Telephone:	(610) 923-3859		
Email:	tim.martin@victaulic.com		

Attachment B – Previous RACT II Submittal

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October 24, 2016

Regional Air Program Manager PA Department of Environmental Protection Northeast Regional Office 2 Public Square Wilkes-Barre, PA 18711-0790

VIA CERTIFIED MAIL 7011 2970 0001 8743 6301

Re: VOC RACT 2 Proposal Submission Victaulic Company - Forks Facility Forks Township, Northampton County, Pennsylvania Title V Operating Permit No. 48-00009

Dear Sir/Madam:

Victaulic Company (Victaulic) has prepared this submission to satisfy the requirements of 25 Pa. Code §§129.96-129.100, *Additional RACT Requirements for Major Sources of NOx and VOCs* for its Victaulic Company-Forks Facility located at 4901 Kesslersville Road, Easton, PA 18040. The Forks Facility is a major source of volatile organic compounds (VOCs) and currently operates under Title V Operating Permit 48-00009.

The Forks Facility manufactures ductile iron pipe fittings with functions including a foundry, general manufacturing, surface coating, assembly/testing, and distribution operations. Along with the VOC sources subject to 25 Pa. Code §129.99(d) (RACT 2 Proposal), there are other VOC sources that either are not applicable since the source's potential to emit is less than 1 tpy (e.g., P004: Inoculation, P014: Annealing Operation) or are subject to and comply with 25 Pa. Code §129.52 (e.g., P009: Large Piece Spraybooth, P012A: Dip Process Paint System). The remainder of this document will address the sources subject to the RACT 2 Proposal requirements.

Sources Subject to Alternative RACT Requirements & their Permit Limits/Capacity

Source ID	Source Name	Permit Limits		
P005	Pouring/ Casting Operations	134,784 tons of	7,488 hours/year	
P008	Sand Handling (Casting Shakeout)	scrap/ year		

Source ID	Source Name	Capacity	Operating Hours		
P016	Core Room Operations	60,000 tons of sand/year	8,760 hours/year		

4901 Kesslersville Road Easton, PA 18040 USA



Physical Description of Sources Subject to Alternative RACT Requirements

• P005: Pouring/Casting Operations – SCC 3-04-003-20

The source of VOCs is the volatilization of organic materials contained within the casting sand and cores. The VOCs are liberated the moment the 2700°F molten iron is poured into the sand mold. The Forks Foundry has two (2) separate sand molding machines, two (2) Disamatic molding machines. Each sand molding machine has one (1) pouring zone for a facility total of two (2) pouring zones.

Particulate matter emissions from the Pouring/Casting Operations source are currently ducted to one of two (2) large baghouses. The combined exhaust volume is approximately 16,000 cubic feet per minute to exhaust the Pouring/Casting Operations. Due to the particulate loading from this source, the RACT analysis will include the installation of a dedicated baghouse to prevent fouling of the VOC control devise.

• P008: Sand Handling (Casting Shakeout) – SCC 3-04-003-31

The source of the VOCs in the casting shake-out area is the continued volatilization of organic material from the time the molten iron is poured into the sand mold. Once poured on one of the two (2) molding lines, the castings cool and are conveyed to one of two (2) Didion rotary drum shake-out units where the sand is tumbled away from the iron castings.

Particulate matter emissions from the Sand Handling (Casting Shakeout) source are currently ducted to one of two (2) large baghouses. The combined exhaust volume is approximately 47,000 cubic feet per minute to exhaust the Sand Handling (Casting Shakeout). Due to the particulate loading from this source, the RACT analysis will include the installation of a dedicated baghouse to prevent fouling of the VOC control devise.

 P016: Core Room Operations – SCC 3-04-003-70 The primary sources of VOCs in the Core Room Operations consist of cold box (isocure) core production and shell core production.

The cold-box core production consists of a two-part resin and a catalyst. Sand is mixed with the two-part resin and formed into a core. Then the catalyst is used to accelerate the curing of the resin. VOC emissions from the catalyst are exhausted to an acid scrubber; whereas, VOC emissions from the resin are exhausted via general facility ventilation over a period of time, up to 7 days (168 hours) after the core is formed.

The shell core production consists of resin-coated sand being formed and then heated with burners fueled by natural gas. VOC emissions from the shell core production are exhausted via general facility ventilation.

The general facility exhaust volume is approximately 75,000 cubic feet per minute.

Along with the shell core machines, there is a water heater that uses natural gas. The maximum natural gas usage is 46.53 mmcf/year. Based on AP-42/ FIRE emission factors for SCC 01-02-006-02, the VOC emissions are minimal at 0.13 tons per year.



Source ID	Source Name	2015 Actual VOC Emissions	Potential to Emit Emissions
P005	Pouring/ Casting Operations	1.33 tpy	9.43 tpy
P008	Sand Handling (Casting Shakeout)	11.40 tpy	80.87 tpy
P016	Core Room Operations	1.96 tpy	9.22 tpy

Actual & Potential VOC Emissions of Source Subject to Alternative RACT Requirements

RACT Analysis of Sources Subject to Alternative RACT Requirements

As described above, the VOC sources to be controlled consist of high flow, low mass emissions consisting of a multitude of volatile organic species. Due to these overall characteristics, control technologies that are generally employed to successfully treat low-concentration VOC air streams are thermal oxidation and carbon adsorption.

As described above, P005: Pouring/Casting Operations and P008: Sand Handling (Casting Shakeout) are exhausted to two (2) dust collectors, which also control other non-applicable sources. Prior to VOC removal using the identified technologies, primary treatment of these streams for particulate matter would be required to prevent fouling and malfunction. For the purpose of this evaluation, it is assumed that a new dedicated pulse-jet, modular collector would be provided to the RACT-applicable sources prior to VOC control, as the alternative (providing VOC control for all the collectors' exhaust volume) would be unnecessary, impractical, and more costly on a capital and operating basis.

Some other key assumptions made in the control technology evaluation are as follows:

- Even though the facility currently has effective particulate matter control, the existing hoods and capture systems are not designed for VOC capture. The capture efficiencies have never been determined as it relates to VOCs. Thus, 90% capture efficiency of VOCs was assumed for the evaluation.
- For the thermal oxidation control technology, a 99% destruction efficiency was assumed. Various heat recovery scenarios (0%, 35%, 50%, and 70%) were evaluated.
- For the carbon adsorption control technology, an 85% adsorption efficiency was assumed.
- The baghouse designs were based on Victaulic's current standardized approach of modular design, bag type and size, and an air-to-cloth ratio of 4. Waste disposal and utility costs were not accounted in the cost estimates, because these were assumed to be already incurred through existing baghouse collection systems.
- For the thermal oxidation control technology where annual costs were evaluated at the various heat recovery rates, a 1-to-1 cost savings was conservatively assumed for each BTU recovered.
- No costs associated with building modifications or site preparations were included.

Attachments A and B detail the capital and annual costs, as well as the VOC reduction cost rates associated with thermal oxidation and carbon adsorption control technologies, respectively. Below is a summary of the RACT Analysis for both control technologies; only the thermal oxidation 0% and 70% heat recovery scenarios are presented. As can be seen, none of the control technologies are cost effective assuming a RACT benchmark of \$7,000 or less per ton of VOC removed.

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Summary of VOC RACT Analysis

Control Technology	Potential	Overall	Emissions	Annualized	Cost
	Emissions	Control	After	Cost	Effectiveness
		Efficiency	Control	(\$/year)	(\$/ton of
		(Capture x		(Capital +	VOC
		Control)		Operating)	reduced)
P005: Pouring/Casting Operations					
Thermal Oxidation – 0% Heat Recovery	9.43 tpy	89.1%	1.03 tpy	\$3,052,000	\$363,000
Thermal Oxidation - 70% Heat Recovery		89.1%	1.03 tpy	\$1,257,000	\$150,000
Carbon Adsorption		76.5%	2.22 tpy	\$2,981,000	\$413,000
P008: Sand Handling (Casting Shakeout))				
P008: Sand Handling (Casting Shakeout) Thermal Oxidation – 0% Heat Recovery	80.87 tpy	89.1%	8.81 tpy	\$8,324,000	\$116,000
		89.1% 89.1%	8.81 tpy 8.81 tpy	\$8,324,000 \$2,944,000	\$116,000 \$41,000
Thermal Oxidation – 0% Heat Recovery Thermal Oxidation – 70% Heat Recovery		89.1%	8.81 tpy	\$2,944,000	\$41,000
Thermal Oxidation – 0% Heat Recovery Thermal Oxidation – 70% Heat Recovery Carbon Adsorption		89.1%	8.81 tpy	\$2,944,000	\$41,000
Thermal Oxidation – 0% Heat Recovery Thermal Oxidation – 70% Heat Recovery Carbon Adsorption P016: Core Room Operations	80.87 tpy	89.1% 76.5%	8.81 tpy 19.0 tpy	\$2,944,000 \$8,036,000	\$41,000 \$130,000

Should you have any questions, please do not hesitate to contact me at (610) 559-3476 or kraig.hum@victaulic.com.

Sincerely

Kraig L. Hume, CHMM Manager, Environmental Engineering

Attachment A: Thermal Oxidizer Attachment B: Carbon Adsorption

cc: Tim Martin, Victaulic-Forks Facility Plant Manager



BOX 31 PA 18044-0031



P.O. Box 31 Easton, PA 18044-0031



SHIP TO:

Regional Air Program Manager PA Department of Environmental Protection Northeast Regional Office 2 Public Square Wilkes-Barre, PA 18711-0790

www.victaulic.com

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Attachment A-Thermal Oxidation

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-1 Thermal Oxidation Cost Summary

Total Thermal Oxidizer Instal	led Cost Estimate	
Technology Description:	Thermal Oxidizer	r
Category		Cost
0% Heat Recovery		
Casting Shakeout (CS)	\$	362,803
Casting Pouring (CP)	\$	281,489
Core Room	\$	405,015
35% Heat Recovery		
Casting Shakeout (CS)	\$	609,615
Casting Pouring (CP)	\$	460,213
Core Room	\$	688,668
50% Heat Recovery		
Casting Shakeout (CS)	\$	704,495
Casting Pouring (CP)	\$	538,009
Core Room	\$	791,883
70% Heat Recovery		
Casting Shakeout (CS)	\$	879,627
Casting Pouring (CP)	\$	671,898
Core Room	\$	988,646

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-2 Thermal Oxidation Cost Summary

Total Dust Collector Installed	Cost Estimate	
Technology Description:	Dust Collector	
Category	C	ost
0% Heat Recovery		
Casting Shakeout (CS)	\$	588,971
Casting Pouring (CP)	\$	199,225
Core Room	\$	-
35% Heat Recovery		
Casting Shakeout (CS)	\$	588,971
Casting Pouring (CP)	\$	199,225
Core Room	\$	-
50% Heat Recovery		
Casting Shakeout (CS)	\$	588,971
Casting Pouring (CP)	\$	199,225
Core Room	\$	-
70% Heat Recovery		
Casting Shakeout (CS)	\$	588,971
Casting Pouring (CP)	\$	199,225
Core Room	\$	-

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-3 Thermal Oxidation Cost Summary

Annual Cost Estimate				
Technology Description:	Thermal Oxidizer & Dust Collecto			
Category		Cost		
0% Heat Recovery				
Casting Shakeout (CS)	\$	8,324,424		
Casting Pouring (CP)	\$	3,051,739		
Core Room	\$	12,769,626		
35% Heat Recovery				
Casting Shakeout (CS)	\$	5,634,987		
Casting Pouring (CP)	\$	2,152,320		
Core Room	\$	8,458,291		
50% Heat Recovery				
Casting Shakeout (CS)	\$	4,477,867		
Casting Pouring (CP)	\$	1,766,122		
Core Room	\$	6,603,239		
70% Heat Recovery				
Casting Shakeout (CS)	\$	2,944,476		
Casting Pouring (CP)	\$	1,256,578		
Core Room	\$	4,141,919		

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-4 Thermal Oxidation Cost Summary

VOC Reduction Cost					
Technology Description:	Thermal Oxidizer & Dust Collector				
Category	Cost of Control (\$/ton)				
0% Heat Recovery					
Casting Shakeout (CS)	\$	115,528			
Casting Pouring (CP)	\$	363,210			
Core Room	\$	1,554,424			
35% Heat Recovery					
Casting Shakeout (CS)	\$	78,204			
Casting Pouring (CP)	\$	256,164			
Core Room	\$	1,029,613			
50% Heat Recovery					
Casting Shakeout (CS)	\$	62,145			
Casting Pouring (CP)	\$	210,199			
Core Room	\$	803,801			
70% Heat Recovery					
Casting Shakeout (CS)	\$	40,864			
Casting Pouring (CP)	\$	149,555			
Core Room	\$	504,189			

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-5 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer			
Process Description:	Casting Shakeou	Casting Shakeout - 0% Recovery		
Design Inputs:	<u> </u>			
Volumetric flowrate (scfm): (500 - 50,000)		48,754		
Heat Recovery (%):		0		
Category	Cost Factor	Applied to		Cost
Purchased Equipment (PEC)			\$	225,344
Thermal Oxidizer (EC)			\$	190,969
Intrumentation	10%	EC	\$	19,097
Sales Tax	3%	EC	\$	5,729
Freight	5%	EC	\$	9,548
Direct Installation Costs (DIC)			\$	67,603
Foundations and supports	8%	PEC	\$	18,027
Handling and erection	14%	PEC	\$	31,548
Electrical	4%	PEC	\$	9,014
Piping	2%	PEC	\$	4,507
Insulation for ductwork	1%	PEC	\$	2,253
Painting	1%	PEC	\$	2,253
Indirect Installation Costs (IIC)			\$	69,857
Engineering	10%	PEC	\$	22,534
Construction and field expenses	5%	PEC	\$	11,267
Contractor fees	10%	PEC	\$	22,534
Start-up	2%	PEC	\$	4,507
Performance test	1%	PEC	\$	2,253
Contingencies	3%	PEC	\$	6,760

Total Capital Investment (PEC + DIC + IIC)

\$ 362,803

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-6 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer				
Process Description:	Casting Shakeout - 0% Recovery				
Design Inputs:					
Annual Natural Gas Consumption (MCF)	788,000				
Natural Gas Cost (\$/MCF)	10.00				
Annual Electrical Consumption (kWh)	274,500				
Electrical Cost (\$/kWh)	0.07				
Equipment Life (years)	10				
Interest Rate (%):	3.625				
Annual Operating Hours (hours)	7,488				
Category	Suggested Factor	Unit Cost		Cost	
Direct Annual Costs (DAC)			\$	7,949,305	
Operating Labor					
Operator	0.5 hr/shift	\$32.20/hr	\$	15,070	
Supervisor	15% of operator	-	\$	2,260	
Maintenance					
Labor	0.5 hr/shift	\$35/hr	\$	16,380	
Materials	100% of maintenance labor	-	\$	16,380	
Utilities					
Natural Gas	-	-	\$	7,880,000	
Electricity	-	-	\$	19,215	
Indirect Annual Costs (IAC)			\$	88,465	
Overhead	60% of Operating and Maintenance	-	\$	30,054	
Administrative Charges	2% of Total Capital Investment	-	\$	7,256	
Property Taxes	1% of Total Capital Investment	-	\$	3,628	
Insurance	1% of Total Capital Investment	-	\$	3,628	
Capital Recovery ⁽³⁾	CRF*[Total Capital Investment]	_	\$	43,899	

Total Annual Costs (DAC + IAC)

\$ 8,037,770

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n - 1]$; where i = interest and n = equipment life.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-7 Thermal Oxidation Cost Summary

Installed Cost Estimate ⁽¹⁾⁽²⁾⁽³⁾				
Technology Description:	Continuous, Puls	se-Jet (modul	ar)	
Process Description:	Casting Shakeout - 0% Recovery			
Design Inputs:				
Volumetric flowrate (acfm): (4,000 - 500,000)		47,000		
Air to Cloth (A/C) Ratio		4		
Insulated		Yes		
Bag Diameter (in)		6		
Bag Length (ft)		12		
Bag type		op Bag Remova		
Bag Material		6-oz Polyester		
Category	Cost Factor	Applied to		Cost
Purchased Equipment (PEC)			\$	268,936
Fabric Filter System (EC)				\$227,936
Fabric Filter with Insulation				\$200,736
Bags & Cages				\$27,200
Auxilary Equipment				
Intrumentation	10%	EC	\$	22,800
Sales Tax	3%	EC	\$	6,800
Freight	5%	EC	\$	11,400
Direct Installation Costs (DC)			\$	199,013
Foundations and supports	4%	PEC	\$	10,757
Handling and erection	50%	PEC	\$	134,468
Electrical	8%	PEC	\$	21,515
Piping	1%	PEC	\$	2,689
Insulation for ductwork	7%	PEC	\$	18,826
Painting	4%	PEC	\$	10,757
Site Preparation	LS			
Facilities & Buildings	LS			
Indirect Costs (IC)			\$	121,021
Engineering	10%	PEC	\$	26,894
Construction and field expenses	20%	PEC	\$	53,787
Contractor fees	10%	PEC	\$	26,894
Start-up	1%	PEC	\$	2,689
Performance test	1%	PEC	\$	2,689
Contingencies	3%	PEC	\$	8,068
Total Capital Investment (PEC + DC + IC)			\$	588,971

1. Figure 1.9 Equipment costs for pulse-jet filters (modular) from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

2. Table 1.8 Bag Prices for Pulse-Jet, TR polyester bags from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

3. Average CPI from 1998 is 163.0 and the Average CPI for 2016 first 2 quarters is 238.782 (CPI Detailed Report by U.S. Bureau of Labor Statistics, Table 24 (August 2016)

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-8 Thermal Oxidation Cost Summary

Technology Description:	Continuous, Pulse-Jet (modular)				
Process Description:	Casting Shakeout - 0% Recovery				
Design Inputs:					
Bag Change Frequency (years)	5				
Annual Electrical Consumption (kWh)	0				
Electrical Cost (\$/kWh) ⁽³⁾	0.00				
Equipment Life (years)	20				
Interest Rate (%):	3.625				
Annual Operating Hours (hours)	7,488				
Category	Suggested Factor	Unit Cost		Cost	
Direct Annual Costs (DAC)			\$	140,280	
Operating Labor					
Operator ⁽⁴⁾	2 hr/shift	\$32.2/hr	\$	60,278	
Supervisor	15% of operator	-	\$	9,042	
Maintenance					
Labor ⁽⁴⁾	1 hr/shift	\$35/hr	\$	32,760	
Materials	100% of maintenance labor	-	\$	32,760	
Bag & Parts Replacement					
Bags & Cages	-	-	\$	5,440	
Utilities					
Electricity	Already used	-	\$	-	
Compressed Air	Already used	-	\$	-	
Waste Disposal	Already used	-	\$	-	
Indirect Annual Costs (IAC)			\$	146,374	
Overhead	60% of Operating and Maintenance	-	\$	80,904	
Administrative Charges	2% of Total Capital Investment	-	\$	11,779	
Property Taxes	1% of Total Capital Investment	-	\$	5,890	
Insurance	1% of Total Capital Investment	_	\$	5,890	
Capital Recovery ⁽⁵⁾	CRF*[Total Capital Investment]	_	\$	41,911	

Total Annual Costs (DAC + IAC)

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 6, Chapter 1, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Electric costs based on actuals at Forks Facility as provided by Facilities Engineering 2016-10-14

4) Labor wages based on actuals at Forks Facility as provided by Plant Manager 2016-10-13

5) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

\$ 286,654

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-9 Thermal Oxidation Cost Summary

VOC Reduction Cost					
Process Description:	Casting Shakeout - 0% Recovery				
Design Inputs:					
VOC Controlled (tons):	73				
Dust Collector					
Annual Cost (\$) ⁽¹⁾	\$ 286,654				
Thermal Oxidizer					
Annual Cost (\$) ⁽¹⁾	\$ 8,037,770				
Total					
Annual Cost (\$) ⁽¹⁾	\$ 8,324,424				
Cost of Control (\$/ton)	\$ 115,528				

(1) Includes recurring annual costs (e.g. maintenance, utilities) and recovery of capital costs

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-10 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer				
Process Description:	Casting Shakeou	Casting Shakeout - 35% Recovery			
Design Inputs:					
Volumetric flowrate (scfm): (500 - 50,000)		48,754			
Heat Recovery (%):		35			
Category	Cost Factor	Applied to		Cost	
Purchased Equipment (PEC)			\$	378,643	
Thermal Oxidizer (EC)			\$	320,884	
Intrumentation	10%	EC	\$	32,088	
Sales Tax	3%	EC	\$	9,627	
Freight	5%	EC	\$	16,044	
Direct Installation Costs (DIC)			\$	113,593	
Foundations and supports	8%	PEC	\$	30,291	
Handling and erection	14%	PEC	\$	53,010	
Electrical	4%	PEC	\$	15,146	
Piping	2%	PEC	\$	7,573	
Insulation for ductwork	1%	PEC	\$	3,786	
Painting	1%	PEC	\$	3,786	
Indirect Installation Costs (IIC)			\$	117,379	
Engineering	10%	PEC	\$	37,864	
Construction and field expenses	5%	PEC	\$	18,932	
Contractor fees	10%	PEC	\$	37,864	
Start-up	2%	PEC	\$	7,573	
Performance test	1%	PEC	\$	3,786	
Contingencies	3%	PEC	\$	11,359	

Total Capital Investment (PEC + DIC + IIC)

\$ 609,615

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-11 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer				
Process Description:	Casting Shakeout - 35% Recovery				
Design Inputs:	Casting Shakeout - 55% Necovery				
Annual Natural Gas Consumption (MCF)	512,200				
Natural Gas Cost (\$/MCF)	10.00				
Annual Electrical Consumption (kWh)	686,300				
Electrical Consumption (KWH)	0.07				
Equipment Life (years)	10				
Interest Rate (%):	3.625				
Annual Operating Hours (hours)	7,488				
Category	Suggested Factor	Unit Cost		Cost	
Direct Annual Costs (DAC)	Juggesteu Factor	Unit Cost	\$	5,220,131	
Operating Labor			Ŷ	5,220,131	
Operator	0.5 hr/shift	\$32.20/hr	\$	15,070	
Supervisor	15% of operator	-	\$	2,260	
Maintenance	20/001 000101001		Ŷ		
Labor	0.5 hr/shift	\$35/hr	\$	16,380	
Materials	100% of maintenance labor	-	\$	16,380	
Utilities			Ŷ	10,000	
Natural Gas	<u> </u>		\$	5,122,000	
Electricity	<u>-</u>		Ś	48,041	
Licentity			Ŷ	+0,0+1	
Indirect Annual Costs (IAC)			\$	128,202	
Overhead	60% of Operating and Maintenance	-	\$	30,054	
Administrative Charges	2% of Total Capital Investment	-	\$	12,192	
Property Taxes	1% of Total Capital Investment	-	\$	6,096	
Insurance	1% of Total Capital Investment	-	\$	6,096	
Capital Recovery ⁽³⁾	CRF*[Total Capital Investment]	_	\$	73,763	

Total Annual Costs (DAC + IAC)

\$ 5,348,333

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-12 Thermal Oxidation Cost Summary

Installed Cost Estimate ⁽¹⁾⁽²⁾⁽³⁾				
Technology Description:	Continuous, Puls	se-Jet (modu	lar)	
Process Description:	Casting Shakeou	ıt - 35% Reco	very	,
Design Inputs:				
Volumetric flowrate (acfm): (4,000 - 500,000)		47,000		
Air to Cloth (A/C) Ratio		4		
Insulated		Yes		
Bag Diameter (in)		6		
Bag Length (ft)		12		
Bag type	Tc	op Bag Remova	al	
Bag Material	1	6-oz Polyester	•	
Category	Cost Factor	Applied to		Cost
Purchased Equipment (PEC)			\$	268,936
Fabric Filter System (EC)				\$227,936
Fabric Filter with Insulation				\$200,736
Bags & Cages				\$27,200
Auxilary Equipment				
Intrumentation	10%	EC	\$	22,800
Sales Tax	3%	EC	\$	6,800
Freight	5%	EC	\$	11,400
Direct Installation Costs (DC)			\$	199,013
Foundations and supports	4%	PEC	\$	10,757
Handling and erection	50%	PEC	\$	134,468
Electrical	8%	PEC	\$	21,515
Piping	1%	PEC	\$	2,689
Insulation for ductwork	7%	PEC	\$	18,826
Painting	4%	PEC	\$	10,757
Site Preparation	LS			
Facilities & Buildings	LS			
Indirect Costs (IC)			\$	121,021
Engineering	10%	PEC	\$	26,894
Construction and field expenses	20%	PEC	\$	53,787
Contractor fees	10%	PEC	\$	26,894
Start-up	1%	PEC	\$	2,689
Performance test	1%	PEC	\$	2,689
Contingencies	3%	PEC	\$	8,068
Total Capital Investment (PEC + DC + IC)			\$	588,971

1. Figure 1.9 Equipment costs for pulse-jet filters (modular) from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

2. Table 1.8 Bag Prices for Pulse-Jet, TR polyester bags from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

3. Average CPI from 1998 is 163.0 and the Average CPI for 2016 first 2 quarters is 238.782 (CPI Detailed Report by U.S. Bureau of Labor Statistics, Table 24 (August 2016)

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-13 Thermal Oxidation Cost Summary

Technology Description:	Continuous, Pulse-Jet (modular)				
Process Description:	Casting Shakeout - 35% Recovery				
Design Inputs:					
Bag Change Frequency (years)	5				
Annual Electrical Consumption (kWh)	0				
Electrical Cost (\$/kWh) ⁽³⁾	0.00				
Equipment Life (years)	20				
Interest Rate (%):	3.625				
Annual Operating Hours (hours)	7,488				
Category	Suggested Factor	Unit Cost		Cost	
Direct Annual Costs (DAC)			\$	140,280	
Operating Labor					
Operator ⁽⁴⁾	2 hr/shift	\$32.2/hr	\$	60,278	
Supervisor	15% of operator	-	\$	9,042	
Maintenance					
Labor ⁽⁴⁾	1 hr/shift	\$35/hr	\$	32,760	
Materials	100% of maintenance labor	-	\$	32,760	
Bag & Parts Replacement					
Bags & Cages	-	-	\$	5,440	
Utilities					
Electricity	Already used	-	\$	-	
Compressed Air	Already used	-	\$	-	
Waste Disposal	Already used	-	\$	-	
Indirect Annual Costs (IAC)			\$	146,374	
Overhead	60% of Operating and Maintenance	-	\$	80,904	
Administrative Charges	2% of Total Capital Investment	-	\$	11,779	
Property Taxes	1% of Total Capital Investment	-	\$	5,890	
Insurance	1% of Total Capital Investment	-	\$	5,890	
Capital Recovery ⁽⁵⁾	CRF*[Total Capital Investment]	-	\$	41,911	

Total Annual Costs (DAC + IAC)

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 6, Chapter 1, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Electric costs based on actuals at Forks Facility as provided by Facilities Engineering 2016-10-14

4) Labor wages based on actuals at Forks Facility as provided by Plant Manager 2016-10-13

5) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

\$ 286,654

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-14 Thermal Oxidation Cost Summary

VOC Reduction Cost	
Process Description:	Casting Shakeout - 35% Recovery
Design Inputs:	
VOC Controlled (tons):	73
Dust Collector	
Annual Cost (\$) ⁽¹⁾	\$ 286,654
Thermal Oxidizer	
Annual Cost (\$) ⁽¹⁾	\$ 5,348,333
Total	
Annual Cost (\$) ⁽¹⁾	\$ 5,634,987
Cost of Control (\$/ton)	\$ 78,204

(1) Includes recurring annual costs (e.g. maintenance, utilities) and recovery of capital costs

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-15 **Thermal Oxidation Cost Summary**

Technology Description:	Thermal Oxidize	r		
Process Description:		Casting Shakeout - 50% Recovery		
Design Inputs:	Casting Shakeou	10 3070 11000	CI	/
Volumetric flowrate (scfm): (500 - 50,000)		48,754		
Heat Recovery (%):		50		
Category	Cost Factor	Applied to		Cost
Purchased Equipment (PEC)			\$	437,57
Thermal Oxidizer (EC)			\$	370,820
Intrumentation	10%	EC	\$	37,08
Sales Tax	3%	EC	\$	11,12
Freight	5%	EC	\$	18,54
Direct Installation Costs (DIC)			\$	131,27
Foundations and supports	8%	PEC	\$	35,00
Handling and erection	14%	PEC	\$	61,26
Electrical	4%	PEC	\$	17,50
Piping	2%	PEC	\$	8,75
Insulation for ductwork	1%	PEC	\$	4,37
Painting	1%	PEC	\$	4,37
Indirect Installation Costs (IIC)			\$	135,64
Engineering	10%	PEC	\$	43,75
Construction and field expenses	5%	PEC	\$	21,87
Contractor fees	10%	PEC	\$	43,75
Start-up	2%	PEC	\$	8,75
Performance test	1%	PEC	\$	4,37
Contingencies	3%	PEC	\$	13,12

Total Capital Investment (PEC + DIC + IIC)	\$ 704,495
1) Purchases equipment cost, direct installations costs, and indirect installations costs are based or	n the methodology outlines
in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.	

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-16 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer				
Process Description:	Casting Shakeout - 50% Recovery				
Design Inputs:					
Annual Natural Gas Consumption (MCF)	394,000				
Natural Gas Cost (\$/MCF)	10.00				
Annual Electrical Consumption (kWh)	823,500				
Electrical Cost (\$/kWh)	0.07				
Equipment Life (years)	10				
Interest Rate (%):	3.625				
Annual Operating Hours (hours)	7,488				
Category	Suggested Factor	Unit Cost		Cost	
Direct Annual Costs (DAC)			\$	4,047,735	
Operating Labor					
Operator	0.5 hr/shift	\$32.20/hr	\$	15,070	
Supervisor	15% of operator	-	\$	2,260	
Maintenance					
Labor	0.5 hr/shift	\$35/hr	\$	16,380	
Materials	100% of maintenance labor	-	\$	16,380	
Utilities					
Natural Gas	-	-	\$	3,940,000	
Electricity	-	-	\$	57,645	
Indirect Annual Costs (IAC)			\$	143,478	
Overhead	60% of Operating and Maintenance	-	\$	30,054	
Administrative Charges	2% of Total Capital Investment	-	\$	14,090	
Property Taxes	1% of Total Capital Investment	-	\$	7,045	
Insurance	1% of Total Capital Investment	-	\$	7,045	
Capital Recovery ⁽³⁾	CRF*[Total Capital Investment]	-	\$	85,244	

Total Annual Costs (DAC + IAC)

\$ 4,191,213

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-17 Thermal Oxidation Cost Summary

Installed Cost Estimate ⁽¹⁾⁽²⁾⁽³⁾				
Technology Description:	Continuous, Puls	se-Jet (modu	lar)	
Process Description:	Casting Shakeou	ıt - 50% Reco	very	,
Design Inputs:				
Volumetric flowrate (acfm): (4,000 - 500,000)		47,000		
Air to Cloth (A/C) Ratio		4		
Insulated		Yes		
Bag Diameter (in)		6		
Bag Length (ft)		12		
Bag type	Tc	op Bag Remova	al	
Bag Material	1	6-oz Polyester	-	
Category	Cost Factor	Applied to		Cost
Purchased Equipment (PEC)			\$	268,936
Fabric Filter System (EC)				\$227,936
Fabric Filter with Insulation				\$200,736
Bags & Cages				\$27,200
Auxilary Equipment				
Intrumentation	10%	EC	\$	22,800
Sales Tax	3%	EC	\$	6,800
Freight	5%	EC	\$	11,400
Direct Installation Costs (DC)			\$	199,013
Foundations and supports	4%	PEC	\$	10,757
Handling and erection	50%	PEC	\$	134,468
Electrical	8%	PEC	\$	21,515
Piping	1%	PEC	\$	2,689
Insulation for ductwork	7%	PEC	\$	18,826
Painting	4%	PEC	\$	10,757
Site Preparation	LS			
Facilities & Buildings	LS			
Indirect Costs (IC)			\$	121,021
Engineering	10%	PEC	\$	26,894
Construction and field expenses	20%	PEC	\$	53,787
Contractor fees	10%	PEC	\$	26,894
Start-up	1%	PEC	\$	2,689
Performance test	1%	PEC	\$	2,689
Contingencies	3%	PEC	\$	8,068
Total Capital Investment (PEC + DC + IC)			\$	588,971

1. Figure 1.9 Equipment costs for pulse-jet filters (modular) from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

2. Table 1.8 Bag Prices for Pulse-Jet, TR polyester bags from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

3. Average CPI from 1998 is 163.0 and the Average CPI for 2016 first 2 quarters is 238.782 (CPI Detailed Report by U.S. Bureau of Labor Statistics, Table 24 (August 2016)

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-18 Thermal Oxidation Cost Summary

Technology Description:	Continuous, Pulse-Jet (modular)				
Process Description:	Casting Shakeout - 50% Recovery				
Design Inputs:	i				
Bag Change Frequency (years)	5				
Annual Electrical Consumption (kWh)	0				
Electrical Cost (\$/kWh) ⁽³⁾	0.00				
Equipment Life (years)	20				
Interest Rate (%):	3.625				
Annual Operating Hours (hours)	7,488				
Category	Suggested Factor	Unit Cost		Cost	
Direct Annual Costs (DAC)			\$	140,280	
Operating Labor					
Operator ⁽⁴⁾	2 hr/shift	\$32.2/hr	\$	60,278	
Supervisor	15% of operator	-	\$	9,042	
Maintenance					
Labor ⁽⁴⁾	1 hr/shift	\$35/hr	\$	32,760	
Materials	100% of maintenance labor	-	\$	32,760	
Bag & Parts Replacement					
Bags & Cages	-	-	\$	5,440	
Utilities					
Electricity	Already used	-	\$	-	
Compressed Air	Already used	-	\$	-	
Waste Disposal	Already used	-	\$	-	
Indirect Annual Costs (IAC)			\$	146,374	
Overhead	60% of Operating and Maintenance	_	\$	80,904	
Administrative Charges	2% of Total Capital Investment	-	\$	11,779	
Property Taxes	1% of Total Capital Investment	-	\$	5,890	
Insurance	1% of Total Capital Investment	-	\$	5,890	
Capital Recovery ⁽⁵⁾	CRF*[Total Capital Investment]	_	\$	41,911	

Total Annual Costs (DAC + IAC)

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 6, Chapter 1, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Electric costs based on actuals at Forks Facility as provided by Facilities Engineering 2016-10-14

4) Labor wages based on actuals at Forks Facility as provided by Plant Manager 2016-10-13

5) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

\$ 286,654

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-19 Thermal Oxidation Cost Summary

VOC Reduction Cost	
Process Description:	Casting Shakeout - 50% Recovery
Design Inputs:	
VOC Controlled (tons):	73
Dust Collector	
Annual Cost (\$) ⁽¹⁾	\$ 286,654
Thermal Oxidizer	
Annual Cost (\$) ⁽¹⁾	\$ 4,191,213
Total	
Annual Cost (\$) ⁽¹⁾	\$ 4,477,867
Cost of Control (\$/ton)	\$ 62,145

(1) Includes recurring annual costs (e.g. maintenance, utilities) and recovery of capital costs

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-20 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer			
Process Description:	Casting Shakeou	Casting Shakeout - 70% Recovery		
Design Inputs:	0			
Volumetric flowrate (scfm): (500 - 50,000)		48,754		
Heat Recovery (%):		70		
Category	Cost Factor	Applied to		Cost
Purchased Equipment (PEC)			\$	546,352
Thermal Oxidizer (EC)			\$	463,010
Intrumentation	10%	EC	\$	46,301
Sales Tax	3%	EC	\$	13,890
Freight	5%	EC	\$	23,151
Direct Installation Costs (DIC)			\$	163,906
Foundations and supports	8%	PEC	\$	43,708
Handling and erection	14%	PEC	\$	76,489
Electrical	4%	PEC	\$	21,854
Piping	2%	PEC	\$	10,927
Insulation for ductwork	1%	PEC	\$	5,464
Painting	1%	PEC	\$	5,464
Indirect Installation Costs (IIC)			\$	169,369
Engineering	10%	PEC	\$	54,635
Construction and field expenses	5%	PEC	\$	27,318
Contractor fees	10%	PEC	\$	54,635
Start-up	2%	PEC	\$	10,927
Performance test	1%	PEC	\$	5,464
Contingencies	3%	PEC	\$	16,391

Total Capital Investment (PEC + DIC + IIC)

\$ 879,627

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-21 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer			
Process Description:	Casting Shakeout - 70% Recovery			
Design Inputs:				
Annual Natural Gas Consumption (MCF)	236,400			
Natural Gas Cost (\$/MCF)	10.00			
Annual Electrical Consumption (kWh)	1,029,400)		
Electrical Cost (\$/kWh)	0.07			
Equipment Life (years)	10			
Interest Rate (%):	3.625			
Annual Operating Hours (hours)	7,488			
Category	Suggested Factor	Unit Cost		Cost
Direct Annual Costs (DAC)			\$	2,486,148
Operating Labor				
Operator	0.5 hr/shift	\$32.20/hr	\$	15,070
Supervisor	15% of operator	-	\$	2,260
Maintenance				
Labor	0.5 hr/shift	\$35/hr	\$	16,380
Materials	100% of maintenance labor	-	\$	16,380
Utilities				
Natural Gas	-	-	\$	2,364,000
Electricity	-	-	\$	72,058
Indirect Annual Costs (IAC)			\$	171,674
Overhead	60% of Operating and Maintenance	-	\$	30,054
Administrative Charges	2% of Total Capital Investment - \$		17,593	
Property Taxes	1% of Total Capital Investment	-	\$	8,796
Insurance	1% of Total Capital Investment	-	\$	8,796
Capital Recovery ⁽³⁾	CRF*[Total Capital Investment]	_	\$	106,435

Total Annual Costs (DAC + IAC)

\$ 2,657,822

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-22 Thermal Oxidation Cost Summary

Installed Cost Estimate ⁽¹⁾⁽²⁾⁽³⁾				
Technology Description:	Continuous, Puls	se-Jet (modu	lar)	
Process Description:	Casting Shakeou	ıt - 70% Reco	very	,
Design Inputs:				
Volumetric flowrate (acfm): (4,000 - 500,000)		47,000		
Air to Cloth (A/C) Ratio		4		
Insulated		Yes		
Bag Diameter (in)		6		
Bag Length (ft)		12		
Bag type	Tc	op Bag Remova	al	
Bag Material	1	6-oz Polyester	•	
Category	Cost Factor	Applied to		Cost
Purchased Equipment (PEC)			\$	268,936
Fabric Filter System (EC)				\$227,936
Fabric Filter with Insulation				\$200,736
Bags & Cages				\$27,200
Auxilary Equipment				
Intrumentation	10%	EC	\$	22,800
Sales Tax	3%	EC	\$	6,800
Freight	5%	EC	\$	11,400
Direct Installation Costs (DC)			\$	199,013
Foundations and supports	4%	PEC	\$	10,757
Handling and erection	50%	PEC	\$	134,468
Electrical	8%	PEC	\$	21,515
Piping	1%	PEC	\$	2,689
Insulation for ductwork	7%	PEC	\$	18,826
Painting	4%	PEC	\$	10,757
Site Preparation	LS			
Facilities & Buildings	LS			
Indirect Costs (IC)			\$	121,021
Engineering	10%	PEC	\$	26,894
Construction and field expenses	20%	PEC	\$	53,787
Contractor fees	10%	PEC	\$	26,894
Start-up	1%	PEC	\$	2,689
Performance test	1%	PEC	\$	2,689
Contingencies	3%	PEC	\$	8,068
Total Capital Investment (PEC + DC + IC)			\$	588,971

1. Figure 1.9 Equipment costs for pulse-jet filters (modular) from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

2. Table 1.8 Bag Prices for Pulse-Jet, TR polyester bags from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

3. Average CPI from 1998 is 163.0 and the Average CPI for 2016 first 2 quarters is 238.782 (CPI Detailed Report by U.S. Bureau of Labor Statistics, Table 24 (August 2016)

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-23 Thermal Oxidation Cost Summary

Technology Description:	Continuous, Pulse-Jet (modular)			
Process Description:	Casting Shakeout - 70% Recovery			
Design Inputs:				
Bag Change Frequency (years)	5			
Annual Electrical Consumption (kWh)	0			
Electrical Cost (\$/kWh) ⁽³⁾	0.00			
Equipment Life (years)	20			
Interest Rate (%):	3.625			
Annual Operating Hours (hours)	7,488			
Category	Suggested Factor	Unit Cost		Cost
Direct Annual Costs (DAC)			\$	140,280
Operating Labor				
Operator ⁽⁴⁾	2 hr/shift	\$32.2/hr	\$	60,278
Supervisor	15% of operator	-	\$	9,042
Maintenance				
Labor ⁽⁴⁾	1 hr/shift	\$35/hr	\$	32,760
Materials	100% of maintenance labor	-	\$	32,760
Bag & Parts Replacement				
Bags & Cages	-	-	\$	5,440
Utilities				
Electricity	Already used	-	\$	-
Compressed Air	Already used	-	\$	-
Waste Disposal	Already used	-	\$	-
Indirect Annual Costs (IAC)			\$	146,374
Overhead	60% of Operating and Maintenance	-	\$	80,904
Administrative Charges	2% of Total Capital Investment	-	\$	11,779
Property Taxes	1% of Total Capital Investment	-	\$	5,890
Insurance	1% of Total Capital Investment	-	\$	5,890
Capital Recovery ⁽⁵⁾	CRF*[Total Capital Investment]	-	\$	41,911

Total Annual Costs (DAC + IAC)

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 6, Chapter 1, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Electric costs based on actuals at Forks Facility as provided by Facilities Engineering 2016-10-14

4) Labor wages based on actuals at Forks Facility as provided by Plant Manager 2016-10-13

5) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

\$ 286,654

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-24 Thermal Oxidation Cost Summary

VOC Reduction Cost	
Process Description:	Casting Shakeout - 70% Recovery
Design Inputs:	
VOC Controlled (tons):	73
Dust Collector	
Annual Cost (\$) ⁽¹⁾	\$ 286,654
Thermal Oxidizer	
Annual Cost (\$) ⁽¹⁾	\$ 2,657,822
Total	
Annual Cost (\$) ⁽¹⁾	\$ 2,944,476
Cost of Control (\$/ton)	\$ 40,864

(1) Includes recurring annual costs (e.g. maintenance, utilities) and recovery of capital costs

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-25 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer			
Process Description:	Casting Pouring	Casting Pouring - 0% Recovery		
Design Inputs:				
Volumetric flowrate (scfm): (500 - 50,000)		16,597		
Heat Recovery (%):		0		
Category	Cost Factor	Applied to		Cost
Purchased Equipment (PEC)			\$	174,838
Thermal Oxidizer (EC)			\$	148,168
Intrumentation	10%	EC	\$	14,817
Sales Tax	3%	EC	\$	4,445
Freight	5%	EC	\$	7,408
Direct Installation Costs (DIC)			\$	52,451
Foundations and supports	8%	PEC	\$	13,987
Handling and erection	14%	PEC	\$	24,477
Electrical	4%	PEC	\$	6,994
Piping	2%	PEC	\$	3,497
Insulation for ductwork	1%	PEC	\$	1,748
Painting	1%	PEC	\$	1,748
Indirect Installation Costs (IIC)			\$	54,200
Engineering	10%	PEC	\$	17,484
Construction and field expenses	5%	PEC	\$	8,742
Contractor fees	10%	PEC	\$	17,484
Start-up	2%	PEC	\$	3,497
Performance test	1%	PEC	\$	1,748
Contingencies	3%	PEC	\$	5,245

Total Capital Investment (PEC + DIC + IIC)

\$ 281,489

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-26 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer				
Process Description:	Casting Pouring - 0% Recovery				
Design Inputs:	6 6 7				
Annual Natural Gas Consumption (MCF)	268,000				
Natural Gas Cost (\$/MCF)	10.00				
Annual Electrical Consumption (kWh)	93,500				
Electrical Cost (\$/kWh)	0.07				
Equipment Life (years)	10				
Interest Rate (%):	3.625				
Annual Operating Hours (hours)	7,488				
Category	Suggested Factor	Unit Cost		Cost	
Direct Annual Costs (DAC)			\$	2,736,635	
Operating Labor					
Operator	0.5 hr/shift	\$32.20/hr	\$	15,070	
Supervisor	15% of operator	-	\$	2,260	
Maintenance					
Labor	0.5 hr/shift	\$35/hr	\$	16,380	
Materials	100% of maintenance labor	-	\$	16,380	
Utilities					
Natural Gas	-	-	\$	2,680,000	
Electricity	-	-	\$	6,545	
Indirect Annual Costs (IAC)			\$	75,374	
Overhead	60% of Operating and Maintenance	-	\$	30,054	
Administrative Charges	2% of Total Capital Investment	-	\$	5,630	
Property Taxes	1% of Total Capital Investment	-	\$	2,815	
Insurance	1% of Total Capital Investment	-	\$	2,815	
Capital Recovery ⁽³⁾	CRF*[Total Capital Investment]	_	\$	34,060	

Total Annual Costs (DAC + IAC)

\$ 2,812,009

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-27 Thermal Oxidation Cost Summary

Technology Description:	Continuous, Pul	se-Jet (modu	lar)	
Process Description:	Casting Pouring	- 0% Recover	γ	
Design Inputs:				
Volumetric flowrate (acfm): (4,000 - 500,000)		16,000		
Air to Cloth (A/C) Ratio		4		
Insulated		Yes		
Bag Diameter (in)		6		
Bag Length (ft)		12		
Bag type	Тс	op Bag Remova	al	
Bag Material	1	6-oz Polyester	-	
Category	Cost Factor	Applied to		Cost
Purchased Equipment (PEC)			\$	90,971
Fabric Filter System (EC)				\$77,071
Fabric Filter with Insulation				\$67,871
Bags & Cages				\$9,200
Auxilary Equipment				
Intrumentation	10%	EC	\$	7,700
Sales Tax	3%	EC	\$	2,300
Freight	5%	EC	\$	3,900
Direct Installation Costs (DC)			\$	67,318
Foundations and supports	4%	PEC	\$	3,639
Handling and erection	50%	PEC	\$	45,485
Electrical	8%	PEC	\$	7,278
Piping	1%	PEC	\$	910
Insulation for ductwork	7%	PEC	\$	6,368
Painting	4%	PEC	\$	3,639
Site Preparation	LS			
Facilities & Buildings	LS			
Indirect Costs (IC)			\$	40,937
Engineering	10%	PEC	\$	9,097
Construction and field expenses	20%	PEC	\$	18,194
Contractor fees	10%	PEC	\$	9,097
Start-up	1%	PEC	\$	910
Performance test	1%	PEC	\$	910
Contingencies	3%	PEC	\$	2,729

1. Figure 1.9 Equipment costs for pulse-jet filters (modular) from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

2. Table 1.8 Bag Prices for Pulse-Jet, TR polyester bags from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

3. Average CPI from 1998 is 163.0 and the Average CPI for 2016 first 2 quarters is 238.782 (CPI Detailed Report by U.S. Bureau of Labor Statistics, Table 24 (August 2016)

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-28 Thermal Oxidation Cost Summary

Technology Description:	Continuous, Pulse-Jet (modular)				
Process Description:	Casting Pouring - 0% Recovery				
Design Inputs:	·				
Bag Change Frequency (years)	5				
Annual Electrical Consumption (kWh)	0				
Electrical Cost (\$/kWh) ⁽³⁾	0.00				
Equipment Life (years)	20				
Interest Rate (%):	3.625				
Annual Operating Hours (hours)	7,488				
Category	Suggested Factor	Unit Cost		Cost	
Direct Annual Costs (DAC)			\$	136,680	
Operating Labor					
Operator ⁽⁴⁾	2 hr/shift	\$32.2/hr	\$	60,278	
Supervisor	15% of operator	-	\$	9,042	
Maintenance					
Labor ⁽⁴⁾	1 hr/shift	\$35/hr	\$	32,760	
Materials	100% of maintenance labor	-	\$	32,760	
Bag & Parts Replacement					
Bags & Cages	-	-	\$	1,840	
Utilities					
Electricity	Already used	-	\$	-	
Compressed Air	Already used	-	\$	-	
Waste Disposal	Already used	-	\$	-	
Indirect Annual Costs (IAC)			\$	103,050	
Overhead	60% of Operating and Maintenance	-	\$	80,904	
Administrative Charges	2% of Total Capital Investment	-	\$	3,985	
Property Taxes	1% of Total Capital Investment	-	\$	1,992	
Insurance	1% of Total Capital Investment	-	\$	1,992	
Capital Recovery ⁽⁵⁾	CRF*[Total Capital Investment]	_	\$	14,177	

Total Annual Costs (DAC + IAC)

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 6, Chapter 1, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Electric costs based on actuals at Forks Facility as provided by Facilities Engineering 2016-10-14

4) Labor wages based on actuals at Forks Facility as provided by Plant Manager 2016-10-13

5) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

\$ 239,730

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-29 Thermal Oxidation Cost Summary

VOC Reduction Cost	
Process Description:	Casting Pouring - 0% Recovery
Design Inputs:	
VOC Controlled (tons):	8
Dust Collector	
Annual Cost (\$) ⁽¹⁾	\$ 239,730
Thermal Oxidizer	
Annual Cost (\$) ⁽¹⁾	\$ 2,812,009
Total	
Annual Cost (\$) ⁽¹⁾	\$ 3,051,739
Cost of Control (\$/ton)	\$ 363,210

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-30 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer				
Process Description:	Casting Pouring	Casting Pouring - 35% Recovery			
Design Inputs:					
Volumetric flowrate (scfm): (500 - 50,000)		16,597			
Heat Recovery (%):		35			
Category	Cost Factor	Applied to		Cost	
Purchased Equipment (PEC)			\$	285,847	
Thermal Oxidizer (EC)			\$	242,243	
Intrumentation	10%	EC	\$	24,224	
Sales Tax	3%	EC	\$	7,267	
Freight	5%	EC	\$	12,112	
Direct Installation Costs (DIC)			\$	85,754	
Foundations and supports	8%	PEC	\$	22,868	
Handling and erection	14%	PEC	\$	40,019	
Electrical	4%	PEC	\$	11,434	
Piping	2%	PEC	\$	5,717	
Insulation for ductwork	1%	PEC	\$	2,858	
Painting	1%	PEC	\$	2,858	
Indirect Installation Costs (IIC)			\$	88,613	
Engineering	10%	PEC	\$	28,585	
Construction and field expenses	5%	PEC	\$	14,292	
Contractor fees	10%	PEC	\$	28,585	
Start-up	2%	PEC	\$	5,717	
Performance test	1%	PEC	\$	2,858	
Contingencies	3%	PEC	\$	8,575	

Total Capital Investment (PEC + DIC + IIC)

\$ 460,213

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-31 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer					
Process Description:	Casting Pouring - 35% Recovery					
Design Inputs: Annual Natural Gas Consumption (MCF)	174 200					
Natural Gas Cost (\$/MCF)	<u> </u>					
Annual Electrical Consumption (kWh)						
Electrical Consumption (kwn)	233,600					
Equipment Life (years)	0.07					
	3.625					
Interest Rate (%): Annual Operating Hours (hours)	7,488					
	Suggested Factor	Unit Cost		Cost		
Category Direct Annual Costs (DAC)	Suggested Factor	Unit Cost	\$			
			Ş	1,808,442		
Operating Labor		622.20/hr	ć	15.070		
Operator	0.5 hr/shift	\$32.20/hr	\$	15,070		
Supervisor	15% of operator	-	\$	2,260		
Maintenance		10 - V	4			
Labor	0.5 hr/shift	\$35/hr	\$	16,380		
Materials	100% of maintenance labor	-	\$	16,380		
Utilities						
Natural Gas	-	-	\$	1,742,000		
Electricity	-	-	\$	16,352		
Indirect Annual Costs (IAC)			\$	104,148		
Overhead	60% of Operating and Maintenance	-	\$	30,054		
Administrative Charges	2% of Total Capital Investment	-	\$	9,204		
Property Taxes	1% of Total Capital Investment	-	\$	4,602		
Insurance	1% of Total Capital Investment	-	\$	4,602		
Capital Recovery ⁽³⁾	CRF*[Total Capital Investment]	_	\$	55,686		

Total Annual Costs (DAC + IAC)

\$ 1,912,590

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-32 Thermal Oxidation Cost Summary

Technology Description:	Continuous, Pul	se-Jet (modu	ılar)	
Process Description:	Casting Pouring - 35% Recovery			
Design Inputs:				
Volumetric flowrate (acfm): (4,000 - 500,000)		16,000		
Air to Cloth (A/C) Ratio		4		
Insulated		Yes		
Bag Diameter (in)		6		
Bag Length (ft)		12		
Bag type	To	op Bag Remov	al	
Bag Material	1	6-oz Polyeste	r	
Category	Cost Factor	Applied to)	Cost
Purchased Equipment (PEC)			\$	90,971
Fabric Filter System (EC)				\$77,071
Fabric Filter with Insulation				\$67,871
Bags & Cages				\$9 <i>,</i> 200
Auxilary Equipment				
Intrumentation	10%	EC	\$	7,700
Sales Tax	3%	EC	\$	2,300
Freight	5%	EC	\$	3,900
Direct Installation Costs (DC)			\$	67,318
Foundations and supports	4%	PEC	\$	3,639
Handling and erection	50%	PEC	\$	45,485
Electrical	8%	PEC	\$	7,278
Piping	1%	PEC	\$	910
Insulation for ductwork	7%	PEC	\$	6,368
Painting	4%	PEC	\$	3,639
Site Preparation	LS			
Facilities & Buildings	LS			
Indirect Costs (IC)			\$	40,937
Engineering	10%	PEC	\$	9,097
Construction and field expenses	20%	PEC	\$	18,194
Contractor fees	10%	PEC	\$	9,097
Start-up	1%	PEC	\$	910
Performance test	1%	PEC	\$	910
Contingencies	3%	PEC	\$	2,729

1. Figure 1.9 Equipment costs for pulse-jet filters (modular) from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

2. Table 1.8 Bag Prices for Pulse-Jet, TR polyester bags from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

3. Average CPI from 1998 is 163.0 and the Average CPI for 2016 first 2 quarters is 238.782 (CPI Detailed Report by U.S. Bureau of Labor Statistics, Table 24 (August 2016)

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-33 Thermal Oxidation Cost Summary

Technology Description:	Continuous, Pulse-Jet (modular)				
Process Description:	Casting Pouring - 35% Recovery				
Design Inputs:					
Bag Change Frequency (years)	5				
Annual Electrical Consumption (kWh)	0				
Electrical Cost (\$/kWh) ⁽³⁾	0.00				
Equipment Life (years)	20				
Interest Rate (%):	3.625				
Annual Operating Hours (hours)	7,488				
Category	Suggested Factor	Unit Cost		Cost	
Direct Annual Costs (DAC)			\$	136,680	
Operating Labor					
Operator ⁽⁴⁾	2 hr/shift	\$32.2/hr	\$	60,278	
Supervisor	15% of operator	-	\$	9,042	
Maintenance					
Labor ⁽⁴⁾	1 hr/shift	\$35/hr	\$	32,760	
Materials	100% of maintenance labor	-	\$	32,760	
Bag & Parts Replacement					
Bags & Cages	-	-	\$	1,840	
Utilities					
Electricity	Already used	-	\$	-	
Compressed Air	Already used	-	\$	-	
Waste Disposal	Already used	-	\$	-	
Indirect Annual Costs (IAC)			\$	103,050	
Overhead	60% of Operating and Maintenance	-	\$	80,904	
Administrative Charges	2% of Total Capital Investment	-	\$	3,985	
Property Taxes	1% of Total Capital Investment	-	\$	1,992	
Insurance	1% of Total Capital Investment	-	\$	1,992	
Capital Recovery ⁽⁵⁾	CRF*[Total Capital Investment]	-	\$	14,177	

Total Annual Costs (DAC + IAC)

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 6, Chapter 1, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Electric costs based on actuals at Forks Facility as provided by Facilities Engineering 2016-10-14

4) Labor wages based on actuals at Forks Facility as provided by Plant Manager 2016-10-13

5) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

\$ 239,730

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-34 Thermal Oxidation Cost Summary

VOC Reduction Cost	
Process Description:	Casting Pouring - 35% Recovery
Design Inputs:	
VOC Controlled (tons):	8
Dust Collector	
Annual Cost (\$) ⁽¹⁾	\$ 239,730
Thermal Oxidizer	
Annual Cost (\$) ⁽¹⁾	\$ 1,912,590
Total	
Annual Cost (\$) ⁽¹⁾	\$ 2,152,320
Cost of Control (\$/ton)	\$ 256,164

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-35 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer			
Process Description:	Casting Pouring	Casting Pouring - 50% Recovery		
Design Inputs:	0 0		,	
Volumetric flowrate (scfm): (500 - 50,000)		16,597		
Heat Recovery (%):		50		
Category	Cost Factor	Applied to		Cost
Purchased Equipment (PEC)			\$	334,167
Thermal Oxidizer (EC)			\$	283,192
Intrumentation	10%	EC	\$	28,319
Sales Tax	3%	EC	\$	8,496
Freight	5%	EC	\$	14,160
Direct Installation Costs (DIC)			\$	100,250
Foundations and supports	8%	PEC	\$	26,733
Handling and erection	14%	PEC	\$	46,783
Electrical	4%	PEC	\$	13,367
Piping	2%	PEC	\$	6,683
Insulation for ductwork	1%	PEC	\$	3,342
Painting	1%	PEC	\$	3,342
Indirect Installation Costs (IIC)			\$	103,592
Engineering	10%	PEC	\$	33,417
Construction and field expenses	5%	PEC	\$	16,708
Contractor fees	10%	PEC	\$	33,417
Start-up	2%	PEC	\$	6,683
Performance test	1%	PEC	\$	3,342
Contingencies	3%	PEC	\$	10,025

Total Capital Investment (PEC + DIC + IIC)

\$ 538,009

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-36 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer					
Process Description:	Casting Pouring - 50% Recovery					
Design Inputs:						
Annual Natural Gas Consumption (MCF)	134,000					
Natural Gas Cost (\$/MCF)	10.00					
Annual Electrical Consumption (kWh)	280,400					
Electrical Cost (\$/kWh)	0.07					
Equipment Life (years)	10					
Interest Rate (%):	3.625					
Annual Operating Hours (hours)	7,488					
Category	Suggested Factor	Unit Cost		Cost		
Direct Annual Costs (DAC)			\$	1,409,718		
Operating Labor						
Operator	0.5 hr/shift	\$32.20/hr	\$	15,070		
Supervisor	15% of operator	-	\$	2,260		
Maintenance						
Labor	0.5 hr/shift	\$35/hr	\$	16,380		
Materials	100% of maintenance labor	-	\$	16,380		
Utilities						
Natural Gas	-	-	\$	1,340,000		
Electricity	-	-	\$	19,628		
Indirect Annual Costs (IAC)			\$	116,674		
Overhead	60% of Operating and Maintenance	-	\$	30,054		
Administrative Charges	2% of Total Capital Investment	-	\$	10,760		
Property Taxes	1% of Total Capital Investment	-	\$	5,380		
Insurance	1% of Total Capital Investment	-	\$	5,380		
Capital Recovery ⁽³⁾	CRF*[Total Capital Investment]	_	\$	65,099		

Total Annual Costs (DAC + IAC)

\$ 1,526,392

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-37 Thermal Oxidation Cost Summary

Technology Description:	Continuous, Puls	se-Jet (modu	lar)	
Process Description:	Casting Pouring	- 50% Recove	ery	
Design Inputs:				
Volumetric flowrate (acfm): (4,000 - 500,000)		16,000		
Air to Cloth (A/C) Ratio		4		
Insulated		Yes		
Bag Diameter (in)		6		
Bag Length (ft)		12		
Bag type	Тс	p Bag Remova	al	
Bag Material	1	6-oz Polyester	-	
Category	Cost Factor	Applied to		Cost
Purchased Equipment (PEC)			\$	90,971
Fabric Filter System (EC)				\$77,071
Fabric Filter with Insulation				\$67,871
Bags & Cages				\$9,200
Auxilary Equipment				
Intrumentation	10%	EC	\$	7,700
Sales Tax	3%	EC	\$	2,300
Freight	5%	EC	\$	3,900
Direct Installation Costs (DC)			\$	67,318
Foundations and supports	4%	PEC	\$	3,639
Handling and erection	50%	PEC	\$	45,485
Electrical	8%	PEC	\$	7,278
Piping	1%	PEC	\$	910
Insulation for ductwork	7%	PEC	\$	6,368
Painting	4%	PEC	\$	3,639
Site Preparation	LS			
Facilities & Buildings	LS			
Indirect Costs (IC)			\$	40,937
Engineering	10%	PEC	\$	9,097
Construction and field expenses	20%	PEC	\$	18,194
Contractor fees	10%	PEC	\$	9 <i>,</i> 097
Start-up	1%	PEC	\$	910
Performance test	1%	PEC	\$	910
Contingencies	3%	PEC	\$	2,729

1. Figure 1.9 Equipment costs for pulse-jet filters (modular) from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

2. Table 1.8 Bag Prices for Pulse-Jet, TR polyester bags from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

3. Average CPI from 1998 is 163.0 and the Average CPI for 2016 first 2 quarters is 238.782 (CPI Detailed Report by U.S. Bureau of Labor Statistics, Table 24 (August 2016)

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-38 Thermal Oxidation Cost Summary

Technology Description:	Continuous, Pulse-Jet (modular)				
Process Description:	Casting Pouring - 50% Recovery				
Design Inputs:					
Bag Change Frequency (years)	5				
Annual Electrical Consumption (kWh)	0				
Electrical Cost (\$/kWh) ⁽³⁾	0.00				
Equipment Life (years)	20				
Interest Rate (%):	3.625				
Annual Operating Hours (hours)	7,488				
Category	Suggested Factor	Unit Cost		Cost	
Direct Annual Costs (DAC)			\$	136,680	
Operating Labor					
Operator ⁽⁴⁾	2 hr/shift	\$32.2/hr	\$	60,278	
Supervisor	15% of operator	-	\$	9,042	
Maintenance					
Labor ⁽⁴⁾	1 hr/shift	\$35/hr	\$	32,760	
Materials	100% of maintenance labor	-	\$	32,760	
Bag & Parts Replacement					
Bags & Cages	-	-	\$	1,840	
Utilities					
Electricity	Already used	-	\$	-	
Compressed Air	Already used	-	\$	-	
Waste Disposal	Already used	-	\$	-	
Indirect Annual Costs (IAC)			\$	103,050	
Overhead	60% of Operating and Maintenance	-	;	80,904	
Administrative Charges	2% of Total Capital Investment	-	\$	3,985	
Property Taxes	1% of Total Capital Investment	-	\$	1,992	
Insurance	1% of Total Capital Investment	-	\$	1,992	
Capital Recovery ⁽⁵⁾	CRF*[Total Capital Investment]	_	\$	14,177	

Total Annual Costs (DAC + IAC)

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 6, Chapter 1, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Electric costs based on actuals at Forks Facility as provided by Facilities Engineering 2016-10-14

4) Labor wages based on actuals at Forks Facility as provided by Plant Manager 2016-10-13

5) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

\$ 239,730

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-39 Thermal Oxidation Cost Summary

VOC Reduction Cost	
Process Description:	Casting Pouring - 50% Recovery
Design Inputs:	
VOC Controlled (tons):	8
Dust Collector	
Annual Cost (\$) ⁽¹⁾	\$ 239,730
Thermal Oxidizer	
Annual Cost (\$) ⁽¹⁾	\$ 1,526,392
Total	
Annual Cost (\$) ⁽¹⁾	\$ 1,766,122
Cost of Control (\$/ton)	\$ 210,199

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-40 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer				
Process Description:	Casting Pouring	Casting Pouring - 70% Recovery			
Design Inputs:					
Volumetric flowrate (scfm): (500 - 50,000)		16,597			
Heat Recovery (%):		70			
Category	Cost Factor	Applied to		Cost	
Purchased Equipment (PEC)			\$	417,328	
Thermal Oxidizer (EC)			\$	353,668	
Intrumentation	10%	EC	\$	35,367	
Sales Tax	3%	EC	\$	10,610	
Freight	5%	EC	\$	17,683	
Direct Installation Costs (DIC)			\$	125,198	
Foundations and supports	8%	PEC	\$	33,386	
Handling and erection	14%	PEC	\$	58,426	
Electrical	4%	PEC	\$	16,693	
Piping	2%	PEC	\$	8,347	
Insulation for ductwork	1%	PEC	\$	4,173	
Painting	1%	PEC	\$	4,173	
Indirect Installation Costs (IIC)			\$	129,372	
Engineering	10%	PEC	\$	41,733	
Construction and field expenses	5%	PEC	\$	20,866	
Contractor fees	10%	PEC	\$	41,733	
Start-up	2%	PEC	\$	8,347	
Performance test	1%	PEC	\$	4,173	
Contingencies	3%	PEC	\$	12,520	

Total Capital Investment (PEC + DIC + IIC)

\$ 671,898

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-41 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer					
Process Description:	Casting Pouring - 70% Recovery					
Design Inputs:						
Annual Natural Gas Consumption (MCF)	80,400					
Natural Gas Cost (\$/MCF)	10.00					
Annual Electrical Consumption (kWh)	350,400					
Electrical Cost (\$/kWh)	0.07					
Equipment Life (years)	10					
Interest Rate (%):	3.625					
Annual Operating Hours (hours)	7,488					
Category	Suggested Factor	Unit Cost		Cost		
Direct Annual Costs (DAC)			\$	878,618		
Operating Labor						
Operator	0.5 hr/shift	\$32.20/hr	\$	15,070		
Supervisor	15% of operator	-	\$	2,260		
Maintenance						
Labor	0.5 hr/shift	\$35/hr	\$	16,380		
Materials	100% of maintenance labor	-	\$	16,380		
Utilities						
Natural Gas	-	-	\$	804,000		
Electricity	-	-	\$	24,528		
Indirect Annual Costs (IAC)			\$	138,230		
Overhead	60% of Operating and Maintenance	-	\$	30,054		
Administrative Charges	2% of Total Capital Investment	-	\$	13,438		
Property Taxes	1% of Total Capital Investment	-	\$	6,719		
Insurance	1% of Total Capital Investment	-	\$	6,719		
Capital Recovery ⁽³⁾	CRF*[Total Capital Investment]	_	\$	81,300		

Total Annual Costs (DAC + IAC)

\$ 1,016,848

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n - 1]$; where i = interest and n = equipment life.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-42 Thermal Oxidation Cost Summary

Technology Description:	Continuous, Puls	se-Jet (modu	lar)	
Process Description:	Casting Pouring	- 70% Recov	ery	
Design Inputs:				
Volumetric flowrate (acfm): (4,000 - 500,000)		16,000		
Air to Cloth (A/C) Ratio		4		
Insulated		Yes		
Bag Diameter (in)		6		
Bag Length (ft)		12		
Bag type	To	p Bag Remov	al	
Bag Material	1	6-oz Polyeste	r	
Category	Cost Factor	Applied to		Cost
Purchased Equipment (PEC)			\$	90,971
Fabric Filter System (EC)				\$77,071
Fabric Filter with Insulation				\$67,871
Bags & Cages				\$9,200
Auxilary Equipment				
Intrumentation	10%	EC	\$	7,700
Sales Tax	3%	EC	\$	2,300
Freight	5%	EC	\$	3,900
Direct Installation Costs (DC)			\$	67,318
Foundations and supports	4%	PEC	\$	3,639
Handling and erection	50%	PEC	\$	45,485
Electrical	8%	PEC	\$	7,278
Piping	1%	PEC	\$	910
Insulation for ductwork	7%	PEC	\$	6,368
Painting	4%	PEC	\$	3,639
Site Preparation	LS			
Facilities & Buildings	LS			
Indirect Costs (IC)			\$	40,937
Engineering	10%	PEC	\$	9,097
Construction and field expenses	20%	PEC	\$	18,194
Contractor fees	10%	PEC	\$	9,097
Start-up	1%	PEC	\$	910
Performance test	1%	PEC	\$	910
Contingencies	3%	PEC	\$	2,729

1. Figure 1.9 Equipment costs for pulse-jet filters (modular) from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

2. Table 1.8 Bag Prices for Pulse-Jet, TR polyester bags from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

3. Average CPI from 1998 is 163.0 and the Average CPI for 2016 first 2 quarters is 238.782 (CPI Detailed Report by U.S. Bureau of Labor Statistics, Table 24 (August 2016)

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-43 Thermal Oxidation Cost Summary

Technology Description:	Continuous, Pulse-Jet (modular)				
Process Description:	Casting Pouring - 70% Recovery				
Design Inputs:					
Bag Change Frequency (years)	5				
Annual Electrical Consumption (kWh)	0				
Electrical Cost (\$/kWh) ⁽³⁾	0.00				
Equipment Life (years)	20				
Interest Rate (%):	3.625				
Annual Operating Hours (hours)	7,488				
Category	Suggested Factor	Unit Cost		Cost	
Direct Annual Costs (DAC)			\$	136,680	
Operating Labor					
Operator ⁽⁴⁾	2 hr/shift	\$32.2/hr	\$	60,278	
Supervisor	15% of operator	-	\$	9,042	
Maintenance					
Labor ⁽⁴⁾	1 hr/shift	\$35/hr	\$	32,760	
Materials	100% of maintenance labor	-	\$	32,760	
Bag & Parts Replacement					
Bags & Cages	-	-	\$	1,840	
Utilities					
Electricity	Already used	-	\$	-	
Compressed Air	Already used	-	\$	-	
Waste Disposal	Already used	-	\$	-	
Indirect Annual Costs (IAC)			\$	103,050	
Overhead	60% of Operating and Maintenance	-	\$	80,904	
Administrative Charges	2% of Total Capital Investment	-	\$	3,985	
Property Taxes	1% of Total Capital Investment	-	\$	1,992	
Insurance	1% of Total Capital Investment	-	\$	1,992	
Capital Recovery ⁽⁵⁾	CRF*[Total Capital Investment]	_	\$	14,177	

Total Annual Costs (DAC + IAC)

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 6, Chapter 1, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Electric costs based on actuals at Forks Facility as provided by Facilities Engineering 2016-10-14

4) Labor wages based on actuals at Forks Facility as provided by Plant Manager 2016-10-13

5) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

\$ 239,730

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-44 Thermal Oxidation Cost Summary

VOC Reduction Cost	
Process Description:	Casting Pouring - 70% Recovery
Design Inputs:	
VOC Controlled (tons):	8
Dust Collector	
Annual Cost (\$) ⁽¹⁾	\$ 239,730
Thermal Oxidizer	
Annual Cost (\$) ⁽¹⁾	\$ 1,016,848
Total	
Annual Cost (\$) ⁽¹⁾	\$ 1,256,578
Cost of Control (\$/ton)	\$ 149,555

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-45 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidize	r			
Process Description:	Core Room - 0%	Core Room - 0% Recovery			
Design Inputs:					
Volumetric flowrate (scfm): (500 - 50,000)		77,800			
Heat Recovery (%):		0			
Category	Cost Factor	Applied to		Cost	
Purchased Equipment (PEC)			\$	251,562	
Thermal Oxidizer (EC)			\$	213,188	
Intrumentation	10%	EC	\$	21,319	
Sales Tax	3%	EC	\$	6,396	
Freight	5%	EC	\$	10,659	
Direct Installation Costs (DIC)			\$	75,469	
Foundations and supports	8%	PEC	\$	20,125	
Handling and erection	14%	PEC	\$	35,219	
Electrical	4%	PEC	\$	10,062	
Piping	2%	PEC	\$	5,031	
Insulation for ductwork	1%	PEC	\$	2,516	
Painting	1%	PEC	\$	2,516	
Indirect Installation Costs (IIC)			\$	77,984	
Engineering	10%	PEC	\$	25,156	
Construction and field expenses	5%	PEC	\$	12,578	
Contractor fees	10%	PEC	\$	25,156	
Start-up	2%	PEC	\$	5,031	
Performance test	1%	PEC	\$	2,516	
Contingencies	3%	PEC	\$	7,547	

Total Capital Investment (PEC + DIC + IIC)

\$ 405,015

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-46 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer					
Process Description:	Core Room - 0% Recovery					
Design Inputs:						
Annual Natural Gas Consumption (MCF)	1,258,00	0				
Natural Gas Cost (\$/MCF)	10.00					
Annual Electrical Consumption (kWh)	438,000)				
Electrical Cost (\$/kWh)	0.07					
Equipment Life (years)	10					
Interest Rate (%):	3.625					
Annual Operating Hours (hours)	8,760					
Category	Suggested Factor	Unit Cost		Cost		
Direct Annual Costs (DAC)			\$	12,669,259		
Operating Labor						
Operator	0.5 hr/shift	\$32.20/hr	\$	17,630		
Supervisor	15% of operator	-	\$	2,644		
Maintenance						
Labor	0.5 hr/shift	\$35/hr	\$	19,163		
Materials	100% of maintenance labor	-	\$	19,163		
Utilities						
Natural Gas	-	-	\$	12,580,000		
Electricity	-	-	\$	30,660		
Indirect Annual Costs (IAC)			\$	100,367		
Overhead	60% of Operating and Maintenance	-	\$	35,159		
Administrative Charges	2% of Total Capital Investment	-	\$	8,100		
Property Taxes	1% of Total Capital Investment	-	\$	4,050		
Insurance	1% of Total Capital Investment	-	\$	4,050		
Capital Recovery ⁽³⁾	CRF*[Total Capital Investment]	-	\$	49,007		

Total Annual Costs (DAC + IAC)

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

\$ 12,769,626

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-47 Thermal Oxidation Cost Summary

VOC Reduction Cost	
Process Description:	Core Room - 0% Recovery
Design Inputs:	
VOC Controlled (tons):	8
Thermal Oxidizer	
Annual Cost (\$) ⁽¹⁾	\$ 12,769,626
Cost of Control (\$/ton)	\$ 1,554,424

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-48 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidize	Thermal Oxidizer			
Process Description:	Core Room - 359	Core Room - 35% Recovery			
Design Inputs:					
Volumetric flowrate (scfm): (500 - 50,000)		77,800			
Heat Recovery (%):		35			
Category	Cost Factor	Applied to		Cost	
Purchased Equipment (PEC)			\$	427,744	
Thermal Oxidizer (EC)			\$	362,495	
Intrumentation	10%	EC	\$	36,250	
Sales Tax	3%	EC	\$	10,875	
Freight	5%	EC	\$	18,125	
Direct Installation Costs (DIC)			\$	128,323	
Foundations and supports	8%	PEC	\$	34,220	
Handling and erection	14%	PEC	\$	59,884	
Electrical	4%	PEC	\$	17,110	
Piping	2%	PEC	\$	8,555	
Insulation for ductwork	1%	PEC	\$	4,277	
Painting	1%	PEC	\$	4,277	
Indirect Installation Costs (IIC)			\$	132,601	
Engineering	10%	PEC	\$	42,774	
Construction and field expenses	5%	PEC	\$	21,387	
Contractor fees	10%	PEC	\$	42,774	
Start-up	2%	PEC	\$	8,555	
Performance test	1%	PEC	\$	4,277	
Contingencies	3%	PEC	\$	12,832	

Total Capital Investment (PEC + DIC + IIC)

\$ 688,668

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-49 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer			
Process Description:	Core Room - 35% Recovery			
Design Inputs:				
Annual Natural Gas Consumption (MCF)	817,700			
Natural Gas Cost (\$/MCF)	10.00			
Annual Electrical Consumption (kWh)	1,095,100)		
Electrical Cost (\$/kWh)	0.07	<u> </u>		
Equipment Life (years)	10			
Interest Rate (%):	3.625			
Annual Operating Hours (hours)	8,760			
Category	Suggested Factor	Unit Cost		Cost
Direct Annual Costs (DAC)			\$	8,312,256
Operating Labor				
Operator	0.5 hr/shift	\$32.20/hr	\$	17,630
Supervisor	15% of operator	-	\$	2,644
Maintenance				
Labor	0.5 hr/shift	\$35/hr	\$	19,163
Materials	100% of maintenance labor	-	\$	19,163
Utilities				
Natural Gas	-	-	\$	8,177,000
Electricity	-	-	\$	76,657
Indirect Annual Costs (IAC)			\$	146,035
Overhead	60% of Operating and Maintenance	-	\$	35,159
Administrative Charges	2% of Total Capital Investment	-	\$	13,773
Property Taxes	1% of Total Capital Investment	-	\$	6,887
Insurance			6,887	
Capital Recovery ⁽³⁾	CRF*[Total Capital Investment]	_	\$	83,329

Total Annual Costs (DAC + IAC)

\$ 8,458,291

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-50 Thermal Oxidation Cost Summary

VOC Reduction Cost			
Process Description:	escription: Core Room - 35% Recover		
Design Inputs:			
VOC Controlled (tons):	8		
Thermal Oxidizer			
Annual Cost (\$) ⁽¹⁾	\$ 8,458,29		
Cost of Control (\$/ton)	\$ 1,029,61		

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-51 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidize	r		
Process Description:	Core Room - 509	% Recovery		
Design Inputs:		-		
Volumetric flowrate (scfm): (500 - 50,000)		77,800		
Heat Recovery (%):		50		
Category	Cost Factor	Applied to		Cost
Purchased Equipment (PEC)			\$	491,853
Thermal Oxidizer (EC)			\$	416,824
Intrumentation	10%	EC	\$	41,682
Sales Tax	3%	EC	\$	12,505
Freight	5%	EC	\$	20,841
Direct Installation Costs (DIC)			\$	147,556
Foundations and supports	8%	PEC	\$	39,348
Handling and erection	14%	PEC	\$	68,859
Electrical	4%	PEC	\$	19,674
Piping	2%	PEC	\$	9,837
Insulation for ductwork	1%	PEC	\$	4,919
Painting	1%	PEC	\$	4,919
Indirect Installation Costs (IIC)			\$	152,474
Engineering	10%	PEC	\$	49,185
Construction and field expenses	5%	PEC	\$	24,593
Contractor fees	10%	PEC	\$	49,185
Start-up	2%	PEC	\$	9,837
Performance test	1%	PEC	\$	4,919
Contingencies	3%	PEC	Ś	14,756

Total Capital Investment (PEC + DIC + IIC)

\$ 791,883

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-52 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer		
Process Description:	Core Room - 50% Recovery		
Design Inputs:	· ·		
Annual Natural Gas Consumption (MCF)	629,000		
Natural Gas Cost (\$/MCF)	10.00		
Annual Electrical Consumption (kWh)	1,314,100)	
Electrical Cost (\$/kWh)	0.07		
Equipment Life (years)	10		
Interest Rate (%):	3.625		
Annual Operating Hours (hours)	8,760		
Category	Suggested Factor	Unit Cost	Cost
Direct Annual Costs (DAC)			\$ 6,440,586
Operating Labor			
Operator	0.5 hr/shift	\$32.20/hr	\$ 17,630
Supervisor	15% of operator	-	\$ 2,644
Maintenance			
Labor	0.5 hr/shift	\$35/hr	\$ 19,163
Materials	100% of maintenance labor	-	\$ 19,163
Utilities			
Natural Gas	-	-	\$ 6,290,000
Electricity	-	-	\$ 91,987
Indirect Annual Costs (IAC)			\$ 162,653
Overhead	60% of Operating and Maintenance	-	\$ 35,159
Administrative Charges	2% of Total Capital Investment	-	\$ 15,838
Property Taxes	1% of Total Capital Investment	-	\$ 7,919
Insurance	1% of Total Capital Investment	-	\$ 7,919
Capital Recovery ⁽³⁾	CRF*[Total Capital Investment]	_	\$ 95,818

Total Annual Costs (DAC + IAC)

\$ 6,603,239

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n - 1]$; where i = interest and n = equipment life.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-53 Thermal Oxidation Cost Summary

VOC Reduction Cost		
Process Description: Core Room - 50%		
Design Inputs:		
VOC Controlled (tons):	8	
Thermal Oxidizer		
Annual Cost (\$) ⁽¹⁾	\$ 6,603,23	
Cost of Control (\$/ton)	\$ 803,80	

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-54 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidize	r	
Process Description:	Core Room - 709	% Recovery	
Design Inputs:		•	
Volumetric flowrate (scfm): (500 - 50,000)		77,800	
Heat Recovery (%):		70	
Category	Cost Factor	Applied to	Cost
Purchased Equipment (PEC)			\$ 614,066
Thermal Oxidizer (EC)			\$ 520,395
Intrumentation	10%	EC	\$ 52,039
Sales Tax	3%	EC	\$ 15,612
Freight	5%	EC	\$ 26,020
Direct Installation Costs (DIC)			\$ 184,220
Foundations and supports	8%	PEC	\$ 49,125
Handling and erection	14%	PEC	\$ 85,969
Electrical	4%	PEC	\$ 24,563
Piping	2%	PEC	\$ 12,281
Insulation for ductwork	1%	PEC	\$ 6,141
Painting	1%	PEC	\$ 6,141
Indirect Installation Costs (IIC)			\$ 190,360
Engineering	10%	PEC	\$ 61,407
Construction and field expenses	5%	PEC	\$ 30,703
Contractor fees	10%	PEC	\$ 61,407
Start-up	2%	PEC	\$ 12,281
Performance test	1%	PEC	\$ 6,141
Contingencies	3%	PEC	\$ 18,422

Total Capital Investment (PEC + DIC + IIC)

\$ 988,646

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-55 Thermal Oxidation Cost Summary

Technology Description:	Thermal Oxidizer		
Process Description:	Core Room - 70% Recovery		
Design Inputs:	-		
Annual Natural Gas Consumption (MCF)	377,400		
Natural Gas Cost (\$/MCF)	10.00		
Annual Electrical Consumption (kWh)	1,642,700)	
Electrical Cost (\$/kWh)	0.07		
Equipment Life (years)	10		
Interest Rate (%):	3.625		
Annual Operating Hours (hours)	8,760		
Category	Suggested Factor	Unit Cost	Cost
Direct Annual Costs (DAC)			\$ 3,947,588
Operating Labor			
Operator	0.5 hr/shift	\$32.20/hr	\$ 17,630
Supervisor	15% of operator	-	\$ 2,644
Maintenance			
Labor	0.5 hr/shift	\$35/hr	\$ 19,163
Materials	100% of maintenance labor	-	\$ 19,163
Utilities			
Natural Gas	-	-	\$ 3,774,000
Electricity	-	-	\$ 114,989
Indirect Annual Costs (IAC)			\$ 194,331
Overhead	60% of Operating and Maintenance	-	\$ 35,159
Administrative Charges	2% of Total Capital Investment	-	\$ 19,773
Property Taxes	1% of Total Capital Investment	-	\$ 9,886
Insurance	1% of Total Capital Investment	-	\$ 9,886
Capital Recovery ⁽³⁾	CRF*[Total Capital Investment]	_	\$ 119,626

Total Annual Costs (DAC + IAC)

\$ 4,141,919

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 3.2, Chapter 2, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table A-56 Thermal Oxidation Cost Summary

VOC Reduction Cost		
Process Description: Core Room - 70% Re		
Design Inputs:		
VOC Controlled (tons):	8	
Thermal Oxidizer		
Annual Cost (\$) ⁽¹⁾	\$ 4,141,92	
Cost of Control (\$/ton)	\$ 504,18	

Attachment B-Carbon Adsorption

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table B-1 Carbon Adsorption Cost Summary

Total Carbon Adsorption Installed Cost Estimate			
Technology Description:	Carbon Adsorpt	ion	
Area		Cost	
Casting Shakeout (CS)	\$	2,260,178	
Casting Pouring (CP)	\$	2,767,059	
Core Room (CR)	\$	12,042,623	

Total Dust Collector Installed Cost Estimate				
Technology Description:	Dust Collector			
Area		Cost		
Casting Shakeout (CS)	\$	588,971		
Casting Pouring (CP)	\$	199,225		
Core Room (CR)	\$	-		

Annual Cost Estimate		
Technology Description:	Carbon Adsorpt	ion & Dust Collector
Area		Cost
Casting Shakeout (CS)	\$	8,035,587
Casting Pouring (CP)	\$	2,981,092
Core Room (CR)	\$	13,699,851

VOC Reduction Cost		
Technology Description:	Carbon Adsorpti	on
Area	Cost of	Control (\$/ton)
Casting Shakeout (CS)	\$	129,888
Casting Pouring (CP)	\$	413,240
Core Room (CR)	\$	1,942,332

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table B-2 Carbon Adsorption Cost Summary

Installed Cost Estimate ⁽¹⁾⁽²⁾							
Technology Description:	Carbon Adsorbe	r					
Process Description:	Casting Shakeou	Casting Shakeout (CS)					
Design Inputs:							
Volumetric flowrate (acfm): (4,000 - 500,000)		47,000					
Number of Carbon Beds (#):		20					
Length of Bed (in Direction of Flow) (ft)		15					
Bed Shape (Perpendicular to Flow)		Circle					
Diameter (ft)		6					
Carbon Requirement (lbs):		93,400					
Category	Cost Factor	Applied to		Cost			
Purchased Equipment (PEC)			\$	1,403,837			
Carbon Adsorber (EC)			\$	1,189,693			
Intrumentation	10%	EC	\$	118,969			
Sales Tax	3%	EC	\$	35,691			
Freight	5%	EC	\$	59,485			
Direct Installation Costs (DC)			\$	421,151			
Foundations and supports	8%	PEC	\$	112,307			
Handling and erection	14%	PEC	\$	196,537			
Electrical	4%	PEC	\$	56,153			
Piping	2%	PEC	\$	28,077			
Insulation for ductwork	1%	PEC	\$	14,038			
Painting	1%	PEC	\$	14,038			
Indirect Costs (IC)			\$	435,190			
Engineering	10%	PEC	\$	140,384			
Construction and field expenses	5%	PEC	\$	70,192			
Contractor fees	10%	PEC	\$	140,384			
Start-up	2%	PEC	\$	28,077			
Performance test	1%	PEC	\$	14,038			
Contingencies	3%	PEC	\$	42,115			

Total Capital Investment (PEC + DC + IC)

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlined in Section 3.1, Chapter 1, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

\$ 2,260,178

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table B-3 Carbon Adsorption Cost Summary

Technology Description:	Carbon Adsorber					
Process Description:	Casting Shakeout (CS)					
Design Inputs:						
Carbon Usage (lbs)	7,278,300					
Carbon Cost (\$/lb)	1.00					
Annual Electrical Consumption (kWh)	380,000					
Electrical Cost (\$/kWh) ⁽³⁾	0.07					
Equipment Life (years)	10					
Interest Rate (%):	3.625					
Annual Operating Hours (hours)	7,488					
Category	Suggested Factor	Unit Cost		Cost		
Direct Annual Costs (DAC)			\$	7,354,990		
Operating Labor						
Operator ⁽⁴⁾	0.5 hr/shift	\$32.2/hr	\$	15,070		
Supervisor	15% of operator	-	\$	2,260		
Maintenance						
Labor ⁽⁴⁾	0.5 hr/shift	\$35/hr	\$	16,380		
Materials	100% of maintenance labor	-	\$	16,380		
Carbon Replacement						
Carbon	-	-	\$	7,278,300		
Utilities						
Electricity	-	-	\$	26,600		
Indirect Annual Costs (IAC)			\$	393,943		
Overhead	60% of Operating and Maintenance	-	\$	30,054		
Administrative Charges	2% of Total Capital Investment	-	\$	45,204		
Property Taxes	1% of Total Capital Investment	-	\$	22,602		
Insurance	1% of Total Capital Investment		\$	22,602		
Capital Recovery ⁽⁵⁾	CRF*[Total Capital Investment] -		\$	273,482		

Total Annual Costs (DAC + IAC)

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlined in Section 3.1, Chapter 1, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1999. These have been adjusted to reflect inflation using a factor of \$1.43 (2016) / \$1.00 (1999).

3) Electric costs based on actuals at Forks Facility as provided by Facilities Engineering 2016-10-14

4) Labor wages based on actuals at Forks Facility as provided by Plant Manager 2016-10-13

5) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

\$ 7,748,933

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table B-4 Carbon Adsorption Cost Summary

Technology Description:	Continuous, Puls	se-Jet (modul	ar)	
Process Description:	Casting Shakeou	t - 0% Recove	ery	
Design Inputs:			-	
Volumetric flowrate (acfm): (4,000 - 500,000)		47,000		
Air to Cloth (A/C) Ratio		4		
Insulated		Yes		
Bag Diameter (in)		6		
Bag Length (ft)		12		
Bag type	Тс	p Bag Remova	al	
Bag Material	1	6-oz Polyester		
Category	Cost Factor	Applied to		Cost
Purchased Equipment (PEC)			\$	268,936
Fabric Filter System (EC)				\$227,936
Fabric Filter with Insulation				\$200,736
Bags & Cages				\$27,200
Auxilary Equipment				
Intrumentation	10%	EC	\$	22,800
Sales Tax	3%	EC	\$	6,800
Freight	5%	EC	\$	11,400
Direct Installation Costs (DC)			\$	199,013
Foundations and supports	4%	PEC	\$	10,757
Handling and erection	50%	PEC	\$	134,468
Electrical	8%	PEC	\$	21,515
Piping	1%	PEC	\$	2,689
Insulation for ductwork	7%	PEC	\$	18,826
Painting	4%	PEC	\$	10,757
Site Preparation	LS			
Facilities & Buildings	LS			
Indirect Costs (IC)			\$	121,021
Engineering	10%	PEC	\$	26,894
Construction and field expenses	20%	PEC	\$	53,787
Contractor fees	10%	PEC	\$	26,894
Start-up	1%	PEC	\$	2,689
Performance test	1%	PEC	\$	2,689
Contingencies	3%	PEC	\$	8,068

1. Figure 1.9 Equipment costs for pulse-jet filters (modular) from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

2. Table 1.8 Bag Prices for Pulse-Jet, TR polyester bags from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

3. Average CPI from 1998 is 163.0 and the Average CPI for 2016 first 2 quarters is 238.782 (CPI Detailed Report by U.S. Bureau of Labor Statistics, Table 24 (August 2016)

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table B-5 Carbon Adsorption Cost Summary

Technology Description:	Continuous, Pulse-Jet (modular)			
Process Description:	Casting Shakeout (CS)			
Design Inputs:	· · ·			
Bag Change Frequency (years)	5			
Annual Electrical Consumption (kWh)	0			
Electrical Cost (\$/kWh) ⁽³⁾	0.00			
Equipment Life (years)	20			
Interest Rate (%):	3.625			
Annual Operating Hours (hours)	7,488			
Category	Suggested Factor	Unit Cost		Cost
Direct Annual Costs (DAC)			\$	140,280
Operating Labor				
Operator ⁽⁴⁾	2 hr/shift	\$32.2/hr	\$	60,278
Supervisor	15% of operator	-	\$	9,042
Maintenance				
Labor ⁽⁴⁾	1 hr/shift	\$35/hr	\$	32,760
Materials	100% of maintenance labor	-	\$	32,760
Bag & Parts Replacement				
Bags & Cages	-	-	\$	5,440
Utilities				
Electricity	Already used	-	\$	-
Compressed Air	Already used	-	\$	-
Waste Disposal	Already used	-	\$	-
Indirect Annual Costs (IAC)			\$	146,374
Overhead	60% of Operating and Maintenance	-	\$	80,904
Administrative Charges	2% of Total Capital Investment	-	\$	11,779
Property Taxes	1% of Total Capital Investment	-	\$	5,890
Insurance	1% of Total Capital Investment	-	\$	5,890
Capital Recovery ⁽⁵⁾	CRF*[Total Capital Investment]	_	\$	41,911

Total Annual Costs (DAC + IAC)

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 6, Chapter 1, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Electric costs based on actuals at Forks Facility as provided by Facilities Engineering 2016-10-14

4) Labor wages based on actuals at Forks Facility as provided by Plant Manager 2016-10-13

5) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[1+i)^n - 1]$; where i = interest and n = equipment life.

\$ 286,654

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table B-6 Carbon Adsorption Cost Summary

VOC Reduction Cost	
Process Description:	Casting Shakeout (CS)
Design Inputs:	
VOC Controlled (tons):	73
Dust Collector	
Annual Cost (\$) ⁽¹⁾	\$ 286,654
Carbon Adsorber	
Annual Cost (\$) ⁽¹⁾	\$ 7,748,933
Total	
Annual Cost (\$) ⁽¹⁾	\$ 8,035,587
Cost of Control (\$/ton)	\$ 129,888

(1) Includes recurring annual costs (e.g. maintenance, utilities) and recovery of capital costs

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table B-7 Carbon Adsorption Cost Summary

Installed Cost Estimate ⁽¹⁾⁽²⁾			
Technology Description:	Carbon Adsorbe	r	
Process Description:	Casting Pouring	(CP)	
Design Inputs:			
Volumetric flowrate (acfm): (4,000 - 500,000)		16,000	
Number of Carbon Beds (#):		52	
Length of Bed (in Direction of Flow) (ft)		8	
Bed Shape (Perpendicular to Flow)		Circle	
Diameter (ft)		4	
Carbon Requirement (lbs):		28,600	
Category	Cost Factor	Applied to	Cost
Purchased Equipment (PEC)			\$ 1,718,670
Carbon Adsorber (EC)			\$ 1,456,500
Intrumentation	10%	EC	\$ 145,650
Sales Tax	3%	EC	\$ 43,695
Freight	5%	EC	\$ 72,825
Direct Installation Costs (DC)			\$ 515,601
Foundations and supports	8%	PEC	\$ 137,494
Handling and erection	14%	PEC	\$ 240,614
Electrical	4%	PEC	\$ 68,747
Piping	2%	PEC	\$ 34,373
Insulation for ductwork	1%	PEC	\$ 17,187
Painting	1%	PEC	\$ 17,187
Indirect Costs (IC)			\$ 532,788
Engineering	10%	PEC	\$ 171,867
Construction and field expenses	5%	PEC	\$ 85,934
Contractor fees	10%	PEC	\$ 171,867
Start-up	2%	PEC	\$ 34,373
Performance test	1%	PEC	\$ 17,187
Contingencies	3%	PEC	\$ 51,560

Total Capital Investment (PEC + DC + IC)

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlined in Section 3.1, Chapter 1, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

\$ 2,767,059

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1999. These have been adjusted to reflect inflation using a factor of \$1.43 (2016) / \$1.00 (1999).

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table B-8 Carbon Adsorption Cost Summary

Technology Description:	Carbon Adsorber			
Process Description:	Casting Pouring (CP)			
Design Inputs:				
Carbon Usage (lbs)	2,206,600			
Carbon Cost (\$/lb)	1.00			
Annual Electrical Consumption (kWh)	130,300			
Electrical Cost (\$/kWh) ⁽³⁾	0.07			
Equipment Life (years)	10			
Interest Rate (%):	3.625			
Annual Operating Hours (hours)	7,488			
Category	Suggested Factor	Unit Cost		Cost
Direct Annual Costs (DAC)			\$	2,265,811
Operating Labor				
Operator ⁽⁴⁾	0.5 hr/shift	\$32.2/hr	\$	15,070
Supervisor	15% of operator	-	\$	2,260
Maintenance				
Labor ⁽⁴⁾	0.5 hr/shift	\$35/hr	\$	16,380
Materials	100% of maintenance labor	-	\$	16,380
Carbon Replacement				
Carbon	-	-	\$	2,206,600
Utilities				
Electricity	-	-	\$	9,121
Indirect Annual Costs (IAC)			\$	475,551
Overhead	60% of Operating and Maintenance	-	\$	30,054
Administrative Charges	2% of Total Capital Investment -		\$	55,341
Property Taxes	1% of Total Capital Investment -		\$	27,671
Insurance	1% of Total Capital Investment	-	\$	27,671
Capital Recovery ⁽⁵⁾	CRF*[Total Capital Investment]	-	\$	334,815

Total Annual Costs (DAC + IAC)

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlined in Section 3.1, Chapter 1, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1999. These have been adjusted to reflect inflation using a factor of \$1.43 (2016) / \$1.00 (1999).

3) Electric costs based on actuals at Forks Facility as provided by Facilities Engineering 2016-10-14

4) Labor wages based on actuals at Forks Facility as provided by Plant Manager 2016-10-13

5) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n - 1]$; where i = interest and n = equipment life.

\$ 2,741,362

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table B-9 Carbon Adsorption Cost Summary

Technology Description:	Continuous, Puls	se-Jet (modu	ular)	
Process Description:	Casting Pouring			
Design Inputs:				
Volumetric flowrate (acfm): (4,000 - 500,000)		16,000		
Air to Cloth (A/C) Ratio		4		
Insulated		Yes		
Bag Diameter (in)		6		
Bag Length (ft)		12		
Bag type	Тс	p Bag Remov	/al	
Bag Material	1	6-oz Polyeste	er	
Category	Cost Factor	Applied to)	Cost
Purchased Equipment (PEC)			\$	90,971
Fabric Filter System (EC)				\$77,071
Fabric Filter with Insulation				\$67,871
Bags & Cages				\$9,200
Auxilary Equipment				
Intrumentation	10%	EC	\$	7,700
Sales Tax	3%	EC	\$	2,300
Freight	5%	EC	\$	3,900
Direct Installation Costs (DC)			\$	67,318
Foundations and supports	4%	PEC	\$	3,639
Handling and erection	50%	PEC	\$	45,485
Electrical	8%	PEC	\$	7,278
Piping	1%	PEC	\$	910
Insulation for ductwork	7%	PEC	\$	6,368
Painting	4%	PEC	\$	3,639
Site Preparation	LS			
Facilities & Buildings	LS			
Indirect Costs (IC)			\$	40,937
Engineering	10%	PEC	\$	9,097
Construction and field expenses	20%	PEC	\$	18,194
Contractor fees	10%	PEC	\$	9,097
Start-up	1%	PEC	\$	910
Performance test	1%	PEC	\$	910
Contingencies	3%	PEC	\$	2,729

1. Figure 1.9 Equipment costs for pulse-jet filters (modular) from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

2. Table 1.8 Bag Prices for Pulse-Jet, TR polyester bags from "EPA Air Pollution Control Cost Manual," 6th Edition, EPA/452/B-02-001, January 2002, Costs are in Second Quarter 1998 \$USA.

3. Average CPI from 1998 is 163.0 and the Average CPI for 2016 first 2 quarters is 238.782 (CPI Detailed Report by U.S. Bureau of Labor Statistics, Table 24 (August 2016)

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table B-10 Carbon Adsorption Cost Summary

Technology Description:	Continuous, Pulse-Jet (modular)			
Process Description:	Casting Pouring (CP)			
Design Inputs:				
Bag Change Frequency (years)	5			
Annual Electrical Consumption (kWh)	0			
Electrical Cost (\$/kWh) ⁽³⁾	0.00			
Equipment Life (years)	20			
Interest Rate (%):	3.625			
Annual Operating Hours (hours)	7,488			
Category	Suggested Factor	Unit Cost		Cost
Direct Annual Costs (DAC)			\$	136,680
Operating Labor				
Operator ⁽⁴⁾	2 hr/shift	\$32.2/hr	\$	60,278
Supervisor	15% of operator	-	\$	9,042
Maintenance				
Labor ⁽⁴⁾	1 hr/shift	\$35/hr	\$	32,760
Materials	100% of maintenance labor	-	\$	32,760
Bag & Parts Replacement				
Bags & Cages	-	-	\$	1,840
Utilities				
Electricity	Already used	-	\$	-
Compressed Air	Already used	-	\$	-
Waste Disposal	Already used	-	\$	-
Indirect Annual Costs (IAC)			\$	103,050
Overhead	60% of Operating and Maintenance	-	\$	80,904
Administrative Charges	2% of Total Capital Investment	-	\$	3,985
Property Taxes	1% of Total Capital Investment	-	\$	1,992
Insurance	1% of Total Capital Investment	-	\$	1,992
Capital Recovery ⁽⁵⁾	CRF*[Total Capital Investment]	-	\$	14,177

Total Annual Costs (DAC + IAC)

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlines in Section 6, Chapter 1, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1998. These have been adjusted to reflect inflation using a factor of \$1.46 (2016) / \$1.00 (1998).

3) Electric costs based on actuals at Forks Facility as provided by Facilities Engineering 2016-10-14

4) Labor wages based on actuals at Forks Facility as provided by Plant Manager 2016-10-13

5) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[1+i)^n - 1]$; where i = interest and n = equipment life.

\$ 239,730

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table B-11 Carbon Adsorption Cost Summary

VOC Reduction Cost	
Process Description:	Casting Pouring (CP)
Design Inputs:	
VOC Controlled (tons):	8
Dust Collector	
Annual Cost (\$) ⁽¹⁾	\$ 239,73
Carbon Adsorber	
Annual Cost (\$) ⁽¹⁾	\$ 2,741,36
Total	
Annual Cost (\$) ⁽¹⁾	\$ 2,981,09
Cost of Control (\$/ton)	\$ 413,24

(1) Includes recurring annual costs (e.g. maintenance, utilities) and recovery of capital costs

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table B-12 Carbon Adsorption Cost Summary

Technology Description:	Carbon Adsorbe	er		
Process Description:	Core Room (CR)			
Design Inputs:				
Volumetric flowrate (acfm): (4,000 - 500,000)		75,000		
Number of Carbon Beds (#):		280		
Length of Bed (in Direction of Flow) (ft)		8		
Bed Shape (Perpendicular to Flow)		Circle		
Diameter (ft)		4		
Carbon Requirement (lbs):		128,800		
Category	Cost Factor	Applied to)	Cost
Purchased Equipment (PEC)			\$	7,479,890
Carbon Adsorber (EC)			\$	6,338,890
Intrumentation	10%	EC	\$	633,889
Sales Tax	3%	EC	\$	190,167
Freight	5%	EC	\$	316,944
Direct Installation Costs (DC)			\$	2 242 067
Direct Installation Costs (DC) Foundations and supports	8%	PEC	> \$	2,243,967 598,391
••	14%	PEC	ې \$	-
Handling and erection Electrical	4%	PEC	ې \$	1,047,185 299,196
Piping	2%	PEC	ې \$	149,598
Insulation for ductwork	1%	PEC	ې \$	74,799
Painting	1%	PEC	ې \$	74,799
	1,0	120	Ŷ	, 1,755
Indirect Costs (IC)			\$	2,318,766
Engineering	10%	PEC	\$	747,989
Construction and field expenses	5%	PEC	\$	373,994
Contractor fees	10%	PEC	\$	747,989
Start-up	2%	PEC	\$	149,598
Performance test	1%	PEC	\$	74,799
Contingencies	3%	PEC	\$	224,397

Total Capital Investment (PEC + DC + IC)

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlined in Section 3.1, Chapter 1, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1999. These have been adjusted to reflect inflation using a factor of \$1.43 (2016) / \$1.00 (1999).

\$ 12,042,623

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table B-13 Carbon Adsorption Cost Summary

Technology Description:	Carbon Adsorber			
Process Description:	Casting Pouring (CP)			
Design Inputs:	8 8 7			
Carbon Usage (lbs)	11,617,20)0		
Carbon Cost (\$/lb)	1.00			
Annual Electrical Consumption (kWh)	714,700			
Electrical Cost (\$/kWh) ⁽³⁾	0.07			
Equipment Life (years)	10			
Interest Rate (%):	3.625			
Annual Operating Hours (hours)	8,760			
Category	Suggested Factor	Unit Cost		Cost
Direct Annual Costs (DAC)			\$	11,725,828
Operating Labor				
Operator ⁽⁴⁾	0.5 hr/shift	\$32.2/hr	\$	17,630
Supervisor	15% of operator	-	\$	2,644
Maintenance				
Labor ⁽⁴⁾	0.5 hr/shift	\$35/hr	\$	19,163
Materials	100% of maintenance labor	-	\$	19,163
Carbon Replacement				
Carbon	-	-	\$	11,617,200
Utilities				
Electricity	-	-	\$	50,029
Indirect Annual Costs (IAC)			\$	1,974,023
Overhead	60% of Operating and Maintenance	-	\$	35,159
Administrative Charges	2% of Total Capital Investment	-	\$	240,852
Property Taxes	1% of Total Capital Investment	-	\$	120,426
Insurance	1% of Total Capital Investment	-	\$	120,426
Capital Recovery ⁽⁵⁾	CRF*[Total Capital Investment]	_	\$	1,457,159

Total Annual Costs (DAC + IAC)

1) Purchases equipment cost, direct installations costs, and indirect installations costs are based on the methodology outlined in Section 3.1, Chapter 1, of the EPA Air Pollution Control Cost Manual, 6th Edition, 2002.

2) Costs provided in the EPA Air Pollution Control Cost Manual reflected the cost of equipment in 1999. These have been adjusted to reflect inflation using a factor of \$1.43 (2016) / \$1.00 (1999).

3) Electric costs based on actuals at Forks Facility as provided by Facilities Engineering 2016-10-14

4) Labor wages based on actuals at Forks Facility as provided by Plant Manager 2016-10-13

5) Capital Recovery Factor (CRF) is calculated by $[i(1+i)^n]/[(1+i)^n - 1]$; where i = interest and n = equipment life.

\$ 13,699,851

Victaulic Company - Forks Facility VOC RACT 2 Evaluation Table B-14 Carbon Adsorption Cost Summary

VOC Reduction Cost		
Process Description: Casting Pouring		
Design Inputs:		
VOC Controlled (tons):	8	
Carbon Adsorber		
Annual Cost (\$) ⁽¹⁾	\$ 13,699,85	
Cost of Control (\$/ton)	\$ 1,942,33	

(1) Includes recurring annual costs (e.g. maintenance, utilities) and recovery of capital costs

Attachment C – RACT III Submittal



CHAPTER 129. STANDARDS FOR SOURCES ADDITIONAL RACT REQUIREMENTS FOR MAJOR SOURCES OF NOx AND VOCs FOR THE 2015 OZONE NAAQS

Written notification, 25 Pa. Code §§129.111 and 129.115(a)

25 Pa. Code Sections 129.111 and 129.115(a) require that the owner and operator of an air contamination source subject to the final-form RACT III regulations submit a notification describing how you intend to comply with the final-form RACT III requirements, and other information spelled out in subsection 129.115(a). The owner or operator may use this template to notify DEP. Notification must be submitted in writing or electronically to the appropriate Regional Manager located at the appropriate DEP regional office. In addition to the notification required by §§ 129.111 and 129.115(a), you also need to submit an applicable analysis or RACT determination as per § 129.114(a) or (i).

Is the facility major for NOx?	Yes 🗆	No 🖂
Is the facility major for VOC?	Yes 🖂	No 🗆

FACILITY INFORMATION										
Facility Name			Victaulic Co / Forks Facility							
Permit Number			48-00009 PF ID if known							
Address Line1			4901 Kesslersville Road							
Addres	s Line2									
City	Easton			Stat	te	PA		Zip	18040-	-6714
Munic	pality		Forks Township		C	ou	unty Northampton		oton	
			OWNER	INFOR	MAT	FION				
Owner		Victauli	c Co							
Address Line1 4901 Ke			esslersville Road							
Addres	ss Line2									
City		Easton		State	PA	1		Zip	18040-	-6714
Email				Ph	one	61	0-559	9-3476		
CONTACT INFORMATION										
Permit Contact Name			Kraig L Hume							
Permit Contact Title			Global Environmental Mgr							
Address Line			4901 Kesslersville Road							
City			Easton	State	PA	1	2	Zip	18040-	-6714
Email		Kraig.Hume@Victualic.com				I	Phone	610-55	59-3476	

Complete Table 1, including all air contamination sources that commenced operation on or before August 3rd, 2018. Air contamination sources determined to be exempt from permitting requirements also must be included. You may find this information in section A and H of your operating permit.

Source ID	Source Name	Make	Model	Physical location of a source (i.e, building#, plant#, etc.)	Was this source subject to RACT II?
110	Cold Core Box Machine				No
111	Sand Conveyance Silos #3 & #4				No
112	Sand Conveyance Silos #1 & #2				No
113	Shell Core Machines				No
120	Cold Core Box Machine #2				No
P001	Charge Handling & Chip Feeding				No
P002	Venetta Preheater				No
P003	Furnaces – Melting				No
P004	Inoculation				No
P005	Pouring / Casting Operation				Yes
P007	Casting Finishing				No
P008	Sand Handng (Casting Shakeout)				Yes
P009	Large Piece Spraybooth				No
P010	Paintline Spraybooth				No

Table 1 - Source Information

P011	PPS Spray	No
	Booth	
P012A	Dip Proces	No
	Paint System	
P014	Annealing /	No
	Heat Treat	
	Operation	
P016	Core Room	Yes
	Operations	
P018	Burn-Off	No
	Oven	

Complete Table 2 or 3 if the facility is a major NOx or VOC emitting facility. For the column with the title "How do you intend to comply", compliance options are:

- Presumptive RACT requirement under §129.112 (PRES),
- Facility-wide averaging (FAC) §129.113,
- System-wide averaging (SYS) §129.113, or
- Case by case determination §129.114 (**CbC**).

Please provide the applicable subsection if source will comply with the presumptive requirement under §129.112.

Table	2 – Metho	d of RA	CT III	Compli	ance, N	Ox	

Source ID	Source Name	NOx PTE TPY	Exempt from RACT III (yes or no)	How do you intend to comply? (PRES, CbC, FAC or SYS)	Specific citation of rule if presumptive option is chosen

Please complete Table 3 if the facility is a major VOC emitting facility. Please provide the applicable section if a source is complying with any RACT regulation listed in 25 Pa Code §§ 129.51, 129.52(a)—(k) and Table I categories 1—11, 129.52a—129.52e, 129.54—129.63a, 129.64—129.69, 129.71—129.73, 129.75 129.71—129.75, 129.77 and 129.101—129.107.

Source ID	Source Name	VOC PTE TPY	Exempt from RACT III (yes or no)	How do you intend to comply?	Specify citation of rule or subject to 25 Pa Code RACT regulation, (list the applicable sections)
P005	Pouring / Casting Operations	9.43	No / Subject to RACT II	CbC	N/A
P008	Sand Handling (Casting Shakeout)	80.87	No / Subject to RACT II	СЬС	N/A
P016	Core Room Operations	9.22	No / Subject to RACT II	СЬС	N/A
P009	Large Piece Spraybooth		Yes	Pres	129.52
P012A	Dip Process Paint System		Yes	Pres	129.52

Table 3 – Method of RACT III Compliance, VOC