OhioEPA
State of Ohio Environmental Protection Agency

P.O. Box 163669, 1800 WaterMark Dr.
Columbus, Ohio 43216-3669
(614) 644-3020
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George V. Voinovich
Governor

Re: Permit to Install
Stark County
Application No: 15-1142

CERTIFIED MAIL

November 30, 1994

GALT ALLOYS, INC.
BERT NEWMAN
1550 MARIETTA AVE. SE
CANTON, OH 44707

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
CANTON AIR POLLUTION CONTROL

State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 15-1142
APS Premise No. 1576051552
Permit Fee: $800.00

Name of Facility: GALT ALLOYS, INC.

Person to Contact: BERT NEWMAN

Address: 1550 MARIETTA AVE. SE
CANTON, OH 44707

Location of proposed source(s): 1550 MARIETTA AVE. SE
CANTON TWP., OHIO

Description of proposed source(s):
METAL ALLOY CRUSHING OPERATION.

Date of Issuance: November 30, 1994

Effective Date: November 30, 1994

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Donald R Schregardus

Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES(S)

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to

the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for GALT ALLOYS, INC. located in Stark County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P010	Specialty Metal Alloy Crushing Operations; Produce Sized Alloy Pieces from Alloys; Crushers #1,#2,&#3, Multi Deck Screeners #1 & #2, Storage Hoppers #1,#2, & #3, Metal Alloys Handling Operations including Conveyors, Vibratory Feeders, DBL Bins, Bag Feeder, and Product Containerization	Total Enclosure and Fabric Filters	3745-31-05 3745-17-07 3745-17-08 3745-17-11 3745-15-06	0.228 lb PM/hr 5.47 lbs PM/day 1.00 ton PM/yr Limit of Processing 37.8 tons of Metal Alloys per Day Limit of Processing 13,800 Tons of Metal Alloys per Year Fabric Filters to be operated with 95% Capture Efficiency and 99.0% Collection Efficiency

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
PM	1.00

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Canton Air Pollution Control, 420 Market Ave. N. , City Hall, Canton, Ohio 44702-1544.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Canton Air Pollution Control, 420 Market Ave. N. , City Hall, Canton, Ohio 44702-1544.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. This facility's specialty metal alloy crushing system shall consist of Ohio EPA Source P010, a total enclosure, and related control equipment as specified in the Permit to Install application. There shall be three fabric filters servicing the specialty metal alloy crushing system as described in the Permit to Install application including the process flow diagram. For the metal alloy handling operations, the fabric filters shall service the transfer points as described in the Permit to Install Application which shall include but not be limited to the vibratory feeders, the three DCL Bins, the Bag Feeder, and the product containerization operation.

2. A. This facility shall be limited to processing metal alloys as described in the Permit to Install application which include Ferrotitanium, Bortals, Copperzirconium, Silicontitanium, Nickelmagnesium, Ferroaluminum, Ferrozirconium, Ferroboron, Siliconzirconium, Ferrovanadium, Ferrotungsten, Ferrocolumbium, Ferromolybdenum and Vanadiumaluminum. If any additional metal alloys are desired to be processed, the facility must submit a written request to the City of Canton Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544 and obtain written permission from the City of Canton Health Department, Air Pollution Control Division prior to processing any such additional metal alloys. A Permit to Install may be required to be obtained prior to the facility processing such additional metal alloys.

   B. This facility shall be limited to processing 37.8 tons of metal alloys per calendar day and 13,800 tons of metal alloys per calendar year in Ohio EPA Source P010. During the first calendar year of operation, the source shall be limited to processing a prorated amount of metal alloys based on the actual days of operations in the first calendar year. For example, if Source P010 is operated every day from July first to December thirty first of the first year of operation (184 days), the annual amount of metal alloys permitted to be processed for the first calendar year of operation shall be 184 times 37.8 tons per day or 6,955 tons of metal alloys.

3. There shall be no visible particulate emissions from the fabric filters' stacks. There shall be no visible particulate emissions leaving any opening in the building which houses the air contaminant source contained in this Permit to Install. Compliance with these visible emission limitations shall be determined using Test Method 22 as defined in Ohio Administrative Code 3745-17-03(B)(4). The collection efficiency of the particulate matter control system at the points of capture shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust.

4. The particulate matter control system shall be operated such that the collection efficiency of the control systems is 95%, that is, 95% of the particulate matter emitted from the various points of fugitive emissions shall be collected at the points of capture. The particulate matter control system shall be operated such that the collection efficiency of each of the fabric filters is 99% or greater. The sum of the particulate matter emissions per hour from the three fabric filters shall be less than or equal to 0.228 pounds of particulate matter per hour.

5. <u>Fabric Filter Differential Pressure Drop Restrictions, Monitoring, Recording and Reporting</u>

   This facility shall continuously monitor and record the differential pressure drop across each of the three fabric filters serving this source. The differential pressure drop monitor and recorder for each fabric filter shall be installed, calibrated, operated and maintained in accordance with the fabric filter supplier's recommendations, and manufacture's instructions and operating manuals. The differential pressure drop records shall be retained in this facility's files for a period of not less than three years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

6. Galt Alloys, Inc. shall implement a Preventive Maintenance and Malfunction Abatement Plan (PM&MAP) for Ohio EPA Source P010 and the associated emission control system. Prior to the startup of this source this facility shall submit a written PM&MAP and obtain written approval of the plan from the Ohio EPA. This PM&MAP shall become part of this Permit to Install. The PM&MAP shall contain information on an acceptable operating differential pressure drop range across the fabric filters, and, if a differential pressure drop is recorded which is not in the acceptable range, the PM&MAP shall contain the time frame and procedures that Galt Alloy's Inc. will follow to correct the operation of the specialty metal alloy crushing system.

7. This facility shall maintain daily records of the weight of metal alloys processed in Ohio EPA Source No. P010. These

records shall be maintained in a bound logbook and shall be available for review by the Director or his representative during normal business hours at the facility.

After the Source or any portion of the Source is initially operated, this facility shall submit quarterly reports to the City of Canton Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544. The quarterly report shall contain the weight of metal alloys processed in Ohio EPA Source No. P010 per day, by day, for every day in which the Source was operated in the previous calendar year quarter. The quarterly report shall also contain the sum of the weights of metal alloys processed in the previous calendar year quarter. The quarterly report shall be submitted within forty five days of the end of the previous calendar year quarter. These quarterly reports shall be submitted by February fifteenth, May fifteenth, August fifteenth, and November fifteenth of every year.

8. Stack Test Requirement for Particulate Matter Emissions

Within 3 months of initial operation of the air contaminant sources described in this permit, this facility shall conduct, or have conducted, emission tests for this source in order to demonstrate compliance with the hourly allowable mass emission rates for particulate matter. These emission tests shall consist of emission tests to determine the mass rate of emissions of particulate matter and the uncontrolled mass rate of particulate matter emissions (inlet and outlet) of each of the three fabric filters servicing this source. The emission tests shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-17-03. The tests shall be conducted under maximum production rates unless otherwise specified or approved by the Ohio EPA. Each of the fabric filter's maximum production rates shall be 3,150 pounds of material processed per hour and during the test the 3,150 pounds per hour production rate shall be maintained in each portion of Ohio EPA Source P010 that is serviced by the particular fabric filter.

Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification to the City of Canton Health Department, Air Pollution Control Division. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the source operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA's refusal to accept the results of the emission tests.

Personnel from the City of Canton Health Department, Air Pollution Control Division shall be permitted to witness the tests, examine the testing equipment and acquire data and information regarding the source operating parameters.

A comprehensive written report on the results of the emission tests shall be submitted to the City of Canton Health Department, Air Pollution Control Division within 30 days following completion of the tests.