



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

12/01/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P003 (Melting Furnace #1) 27 mmbtu/hr Reverberating Aluminum Melting Furnace. Split off so it has it's own permit**

Ohio Valley Aluminum C LLC Niles Facility (02-78-06-0198)  
Larry Crites  
925 Carle Street  
Niles, OH 44446

Dear Larry Crites:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them 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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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 Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

Michael W. Ahern  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date: 12/01/04

Expiration Date: 12/01/09

This document constitutes issuance to:

Facility ID: 02-78-06-0198  
Ohio Valley Aluminum C LLC Niles Facility  
925 Carle Street  
Niles, OH 44446

of a permit to operate for:

P003 (Melting Furnace #1)  
27 mmbtu/hr Reverberating Aluminum Melting Furnace. Split off so it has it's own permit

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## Part I: General Terms and Conditions

### 1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

### 2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### 4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

### 5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether

cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**6. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

**7. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330) 425-9171

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

## Part II: Special Terms and Conditions

### A. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
reverberating aluminum furnace - melting furnace # 1 ( group 1 furnace with no controls)	OAC rule 3745-17-07(A)(1)	Except as specified by rule, visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed twenty (20) percent opacity, as a six-minute average.
	40 CFR, Part 63, Subpart RRR	15 micrograms of D/F TEQ per megagram (2.1 x 10 <sup>-4</sup> gram of D/F TEQ per ton) of feed/charge to furnace (See A.2.a.)
	OAC rule 3745-35-07(B)	Particulate emissions (PE) shall be limited to 7.2 lbs per hour and 31.5 tons per year.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-35-07(B).

### 2 Additional Terms and Conditions

- 2.a D/F means dioxins and furans. Dioxins and furans means tetra-, penta-, hexa-, and octachlorinated dibenzo dioxins and furans. TEQ means the international method of expressing toxicity equivalents for dioxins and furans as defined in "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update" (EPA-625/3-89-016), available from the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, Virginia 22161, NTIS no. PB 90-145756.

### B. Operational Restrictions

- The permittee, as required in 40 CFR 63.1506(b), must provide and maintain easily visible labels posted at each group 1 furnace that identifies the applicable emission limits and means of compliance, including:
  - The type of affected source or emissions unit (e.g., group 1 furnace).
  - The applicable operational standard(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace, flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the operation, maintenance, and monitoring (OM&M) plan.
- The permittee of each group 1 furnace without add-on air pollution control devices shall operate each furnace in accordance with the work practice/pollution prevention measures document in the OM&M plan and within parameter values or ranges established in the OM&M plan.
- The permittee shall not charge any mixture to the furnace in which the painted/nonclean scrap exceeds 40% by weight per batch or heat.

### **C Monitoring and/or Record Keeping Requirements**

1. The permittee, as required in 40 CFR 63.1510(b), must prepare and implement for each group 1 furnace, a written operation, maintenance, and monitoring (OM&M) plan. This plan was to be submitted to U.S. EPA by September 24, 2002. Each plan must contain the following:
  - a. Process parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process.
  - b. A monitoring schedule for each affected source and emissions unit
  - c. Procedures for the proper operation and maintenance for each process unit
  - d. Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including the calibration and certification of the accuracy of each monitoring device according to the manufacturer's instructions.
  - e. Procedures for monitoring process parameters, if applicable, and the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
  - f. Corrective actions to be taken when process or operating parameters deviate from the value or range established in this section, including:
    - i) procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and
    - ii) procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
  - g. A maintenance schedule for each process that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
  - h. Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in 40 CFR 63.1510(o) for each group 1 furnace not equipped with an add-on air pollution control device.
2. The permittee must inspect the labels for each group 1 furnace at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.
3. The permittee of each affected source or emissions unit subject to an emission limit in lb/ton of feed/charge must install, calibrate, operate, and maintain a device that measures and records or otherwise determines the weight of feed/charge to the emissions unit over the same operating cycle, batch, heat, or time period used in the performance test. The accuracy of the weight measurement device or procedure must be within 1 percent of the weight being measured. The permittee must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.
4. The permittee shall include in the records of the weight of feed/charge to this emissions unit for each batch or heat, the scrap content in percent by weight of clean feed/charge and of painted/nonclean scrap feed/charge. The permittee must develop a written site-specific monitoring plan as part of its OM&M plan, as required in 40 CFR 63.1510(o). This plan was to be submitted to U.S. EPA by September 24, 2002. This plan must include:
  - a. sufficient provisions to ensure continuing compliance with applicable emission limits
  - b. each work practice, equipment/design practice, pollution prevention practice, or other measure used to meet the applicable emission standards;
  - c. provisions for unit labeling, feed/charge weight measurement, and flux measurement
  - d. provisions for a scrap inspection program for monitoring the scrap contamination level of furnace feed/charge materials; and
  - e. a calculation method for monitoring the scrap contamination level of furnace feed/charge materials

**C. Monitoring and/or Record Keeping Requirements (continued)**

6. The permittee must develop and implement a scrap inspection program by March 2003, as required in 40 CFR 63.1510(p). This program must include:
  - a. a proven method for collecting representative samples and measuring the oil and coating content of scrap samples;
  - b. a scrap inspector training program;
  - c. an established correlation between visual inspection and physical measurement of oil and coatings content of scrap samples;
  - d. periodic physical measurements of oil and coatings content of randomly selected scrap samples and comparison with visual inspection results;
  - e. a system for assuring that only acceptable scrap (see B.3. above) is charged to an affected group 1 furnace; and
  - f. record keeping requirements to document conformance with plan requirements.
7. The permittee must calculate and record the 3-day, 24-hour rolling average emissions of D/F for each secondary aluminum processing unit (SAPU) on a daily basis.
8. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of operation during which the charge ratio per batch or heat exceeded the limitation specified in B.3 above, including the actual charge ratios for all such periods of operation. The quarterly deviation reports shall be submitted in accordance with General Term and Condition of this permit.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of operation during which the 3-day, 24-hour rolling average emissions of D/F for each secondary aluminum processing unit, as calculated in E.1.d, exceeded the limitation specified in A.1 above, including emissions for all such periods of operation. The quarterly deviation reports shall be submitted in accordance with General Term and Condition of this permit.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of operation during which the site-specific monitoring plan was not adhered to, including the deviation and any corrective action taken to correct the situation. The quarterly deviation reports shall be submitted in accordance with General Term and Condition of this permit.
4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

**E. Testing Requirements**

1. Compliance with the emissions limitation(s) in section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

**E. Testing Requirements (continued)**

- 1.a** Emission Limitation:  
Twenty (20) percent opacity, as a six-minute average

**Applicable Compliance Method:**

Compliance shall be determined by visible emission evaluations performed in accordance with OAC Rule 3745-17-03(B)(3) using the methods and procedures specified in U.S.EPA Reference Method 9.

- 1.b** Emission Limitation: 7.2 lbs per hour of particulate emissions (PE)

**Applicable Compliance Method:** Compliance is based upon the initial performance test completed on 6/14/02, showing an actual emission of 1.91 lb/hr of PE. If required, compliance with the particulate emission limitation shall be determined through emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Method 5.

- 1.c** Emission Limitation: 31.5 tons per year of PE

**Applicable Compliance Method:** Compliance with the annual emissions shall be based on the actual emission rate in E.1.b times the maximum potential operating rate of 8760 hours per year, divided by 2000lbs/ton.

- 1.d** Emission Limitation: 15 micrograms of D/F TEQ per Mg (2.1 x 10<sup>-4</sup> gram of D/F TEQ per ton) of feed/charge to furnace

**Applicable Compliance Method:** Compliance is based upon the initial performance test completed on 6/14/02, showing an actual emission of 7.65 x 10<sup>-5</sup> gr of D/F TEQ per ton of feed/charge to furnace.

The 3-day, 24-hour rolling average shall be calculated as described in 40 CFR 63.1510(t).

To calculate the 3-day, 24-hour rolling average, the permittee must

Calculate and record the total weight of material charged to each emissions unit in the secondary aluminum processing unit for each 24-hour day of operation using the feed/charge weight information required in C.3 of this permit. If the owner or operator chooses to comply on the basis of weight of aluminum produced by the emissions unit, rather than weight of material charged to the emissions unit, all performance test emissions results and all calculations must be conducted on an aluminum production weight basis.

Multiply the total feed/charge weight to the emissions unit, or the weight of aluminum produced by the emissions unit, for each emissions unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emissions unit (as determined during the performance test) to provide emissions for each emissions unit for the 24-hour period, in pounds.

Divide the total emissions for each emissions unit for the 24-hour period by the total material charged to the emissions unit, or the weight of aluminum produced by the emissions unit over the 24-hour period to provide the daily emission rate for the emissions unit.

Compute the 24-hour daily emission rate using Equation 4:

$$E_{day} = \left\{ \sum_{i=1}^n (T_i \times ER_i) \right\} \text{ over } \left\{ \sum_{i=1}^n T_i \right\}$$

Where,

**E<sub>day</sub>** = The daily D/F emission rate for the secondary aluminum processing unit for the 24-hour period.

**T<sub>i</sub>** = The total amount of feed, or aluminum produced, for emission unit i for the 24-hour period (tons)

**ER<sub>i</sub>** = The measured emission rate for emissions unit i as determined in the performance test (lb/ton or g/Mg of feed/charge).

**n** = The number of emission units in the secondary aluminum processing unit

Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.

**E. Testing Requirements (continued)**

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - 2.a The emission testing shall be conducted within 6 months prior to permit expiration.
  - 2.b The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate emissions and D/F.
  - 2.c The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulate emissions, USEPA Methods 1 - 5 of 40 CFR Part 60, Appendix A, and for D/F, 40 CFR Part 60, Appendix A, USEPA Method 23.
  - 2.d The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Offices refusal to accept the results of the emission test(s).
4. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

**F. Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.



State of Ohio Environmental Protection Agency

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12/01/04

**CERTIFIED MAIL**

**RE: Final Chapter 3745-35 Permit To Operate**

**P008 (Melting Furnace #2) 27 mmbtu/hr Reverberating Aluminum Melting Furnace. Split off so it has it's own permit.**

Ohio Valley Aluminum C LLC Niles Facility (02-78-06-0198)

Larry Crites  
925 Carle Street  
Niles, OH 44446

Dear Larry Crites:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them 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.

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If you have any questions, please contact Northeast District Office.

Sincerely,

Michael W. Ahern  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

Northeast District Office



State of Ohio Environmental Protection Agency

## Final Permit To Operate An Emissions Unit

Effective Date 12/01/04

Expiration Date: 12/01/09

This document constitutes issuance to

Facility ID: 02-78-06-0198  
Ohio Valley Aluminum C LLC Niles Facility  
925 Carle Street  
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of a permit to operate for:

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27 mmbtu/hr Reverberating Aluminum Melting Furnace. Split off so it has it's own permit.

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## Part I: General Terms and Conditions

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<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-35-07(B).

**2. Additional Terms and Conditions**

- 2.a D/F means dioxins and furans. Dioxins and furans means tetra-, penta-, hexa-, and octachlorinated dibenzo dioxins and furans. TEQ means the international method of expressing toxicity equivalents for dioxins and furans as defined in "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update" (EPA-625/3-89-016), available from the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, Virginia 22161, NTIS no. PB 90-145756.

**B. Operational Restrictions**

1. The permittee, as required in 40 CFR 63.1506(b), must provide and maintain easily visible labels posted at each group 1 furnace that identifies the applicable emission limits and means of compliance, including:
- a. The type of affected source or emissions unit (e.g., group 1 furnace)
  - b. The applicable operational standard(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace, flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the operation, maintenance, and monitoring (OM&M) plan.

**B. Operational Restrictions (continued)**

2. The permittee of each group 1 furnace without add-on air pollution control devices shall operate each furnace in accordance with the work practice/pollution prevention measures document in the OM&M plan and within parameter values or ranges established in the OM&M plan.
3. The permittee shall not charge any mixture to the furnace in which the painted/nonclean scrap exceeds 40% by weight per batch or heat.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee, as required in 40 CFR 63.1510(b), must prepare and implement for each group 1 furnace, a written operation, maintenance, and monitoring (OM&M) plan. This plan was to be submitted to U.S. EPA by September 24, 2002. Each plan must contain the following:
  - a. Process parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process.
  - b. A monitoring schedule for each affected source and emissions unit.
  - c. Procedures for the proper operation and maintenance for each process unit.
  - d. Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including the calibration and certification of the accuracy of each monitoring device according to the manufacturer's instructions.
  - e. Procedures for monitoring process parameters, if applicable, and the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
  - f. Corrective actions to be taken when process or operating parameters deviate from the value or range established in this section, including:
    - i) procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and
    - ii) procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
  - g. A maintenance schedule for each process that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
  - h. Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in 40 CFR 63.1510(o) for each group 1 furnace not equipped with an add-on air pollution control device.
2. The permittee must inspect the labels for each group 1 furnace at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.
3. The permittee of each affected source or emissions unit subject to an emission limit in lb/ton of feed/charge must install, calibrate, operate, and maintain a device that measures and records or otherwise determines the weight of feed/charge to the emissions unit over the same operating cycle, batch, heat, or time period used in the performance test. The accuracy of the weight measurement device or procedure must be within 1 percent of the weight being measured. The permittee must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.
4. The permittee shall include in the records of the weight of feed/charge to this emissions unit for each batch or heat, the scrap content in percent by weight of clean feed/charge and of painted/nonclean scrap feed/charge.

**C. Monitoring and/or Record Keeping Requirements (continued)**

5. The permittee must develop a written site-specific monitoring plan as part of its OM&M plan, as required in 40 CFR 63.1510(o). This plan was to be submitted to U.S. EPA by September 24, 2002. This plan must include:
  - a. sufficient provisions to ensure continuing compliance with applicable emission limits;
  - b. each work practice, equipment/design practice, pollution prevention practice, or other measure used to meet the applicable emission standards;
  - c. provisions for unit labeling, feed/charge weight measurement, and flux measurement;
  - d. provisions for a scrap inspection program for monitoring the scrap contamination level of furnace feed/charge materials; and
  - e. a calculation method for monitoring the scrap contamination level of furnace feed/charge materials.
6. The permittee must develop and implement a scrap inspection program by March 2003, as required in 40 CFR 63.1510(p). This program must include:
  - a. a proven method for collecting representative samples and measuring the oil and coating content of scrap samples;
  - b. a scrap inspector training program;
  - c. an established correlation between visual inspection and physical measurement of oil and coatings content of scrap samples;
  - d. periodic physical measurements of oil and coatings content of randomly selected scrap samples and comparison with visual inspection results;
  - e. a system for assuring that only acceptable scrap (see B.3. above) is charged to an affected group 1 furnace; and
  - f. record keeping requirements to document conformance with plan requirements.
7. The permittee must calculate and record the 3-day, 24-hour rolling average emissions of D/F for each secondary aluminum processing unit (SAPU) on a daily basis.
8. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of operation during which the charge ratio per batch or heat exceeded the limitation specified in B.3 above, including the actual charge ratios for all such periods of operation. The quarterly deviation reports shall be submitted in accordance with General Term and Condition of this permit.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of operation during which the 3-day, 24-hour rolling average emissions of D/F for each secondary aluminum processing unit, as calculated in E.1.d, exceeded the limitation specified in A.1 above, including emissions for all such periods of operation. The quarterly deviation reports shall be submitted in accordance with General Term and Condition of this permit.

**D Reporting Requirements (continued)**

3. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of operation during which the site-specific monitoring plan was not adhered to, including the deviation and any corrective action taken to correct the situation. The quarterly deviation reports shall be submitted in accordance with General Term and Condition of this permit.
4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

**E. Testing Requirements**

1. Compliance with the emissions limitation(s) in section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:  
Twenty (20) percent opacity, as a six-minute average.

**Applicable Compliance Method:**

Compliance shall be determined by visible emission evaluations performed in accordance with OAC Rule 3745-17-03(B)(3) using the methods and procedures specified in U.S.EPA Reference Method 9.

- 1.b Emission Limitation: 7.2 lbs per hour of particulate emissions (PE)

**Applicable Compliance Method:** Compliance is based upon the initial performance test completed on 6/14/02, showing an actual emission of 1.91 lb/hr of PE. If required, compliance with the particulate emission limitation shall be determined through emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Method 5.

- 1.c Emission Limitation: 31.5 tons per year of PE

**Applicable Compliance Method:** Compliance with the annual emissions shall be based on the actual emission rate in E.1.b times the maximum potential operating rate of 8760 hours per year, divided by 2000lbs/ton.

- 1.d Emission Limitation: 15 micrograms of D/F TEQ per Mg ( $2.1 \times 10^{-4}$  gram of D/F TEQ per ton) of feed/charge to furnace

**Applicable Compliance Method:** Compliance is based upon the initial performance test completed on 6/14/02 showing an actual emission of  $7.65 \times 10^{-5}$  gr of D/F TEQ per ton of feed/charge to furnace.

The 3-day, 24-hour rolling average shall be calculated as described in 40 CFR 63.1510(t).

To calculate the 3-day, 24-hour rolling average, the permittee must

Calculate and record the total weight of material charged to each emissions unit in the secondary aluminum processing unit for each 24-hour day of operation using the feed/charge weight information required in C.3 of this permit. If the owner or operator chooses to comply on the basis of weight of aluminum produced by the emissions unit, rather than weight of material charged to the emissions unit, all performance test emissions results and all calculations must be conducted on an aluminum production weight basis.

Multiply the total feed/charge weight to the emissions unit, or the weight of aluminum produced by the emissions unit, for each emissions unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emissions unit (as determined during the performance test) to provide emissions for each emissions unit for the 24-hour period, in pounds.

Divide the total emissions for each emissions unit for the 24-hour period by the total material charged to the emissions unit, or the weight of aluminum produced by the emissions unit over the 24-hour period to provide the daily emission rate for the emissions unit.

#### E. Testing Requirements (continued)

Compute the 24-hour daily emission rate using Equation 4:

$$E_{day} = \frac{\sum_{i=1}^n (T_i \times ER_i)}{\sum_{i=1}^n T_i}$$

Where,

- $E_{day}$  = The daily D/F emission rate for the secondary aluminum processing unit for the 24-hour period.
- $T_i$  = The total amount of feed, or aluminum produced, for emission unit  $i$  for the 24-hour period (tons).
- $ER_i$  = The measured emission rate for emissions unit  $i$  as determined in the performance test (lb/ton or g/Mg of feed/charge).

The number of emission units in the secondary aluminum processing unit.

Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted within 6 months prior to permit expiration.

The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate emissions and D/F.

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulate emissions, USEPA Methods 1 - 5 of 40 CFR Part 60, Appendix A, and for D/F, 40 CFR Part 60, Appendix A, USEPA Method 23.

- 2.d The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Offices refusal to accept the results of the emission test(s).
4. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

#### F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A - F.