



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
CUYAHOGA COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 13-04691

Fac ID: 1318000062

DATE: 8/7/2007

Alumitech of Cleveland, Incorporated
Jim Buckert
4181 Bradley Road
Cleveland, OH 44109

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

Sincerely,

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

CC: USEPA

CLAA



**Permit To Install
Terms and Conditions**

**Issue Date: 8/7/2007
Effective Date: 8/7/2007**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 13-04691

Application Number: 13-04691
Facility ID: 1318000062
Permit Fee: **\$2500**
Name of Facility: Alumitech of Cleveland, Incorporated
Person to Contact: Jim Buckert
Address: 4181 Bradley Road
Cleveland, OH 44109

Location of proposed air contaminant source(s) [emissions unit(s)]:

**4181 Bradley Road
Cleveland, Ohio**

Description of proposed emissions unit(s):

Administrative modification to remove continuously from the GE monitoring language.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting 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 (i.e., postmarked) quarterly 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.)

3. 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 this permit. Such records may be maintained in computerized form.

4. 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 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.

5. 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 units 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 the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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 cannot meet the requirements of this permit or cannot meet applicable standards.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

13. Source Operation and Operating Permit Requirements 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. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. 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.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

Final Action Recommendation on a Permit to Install

Public written comments are to be accepted at the appropriate DO/laa for a 30 day period following publication of the draft permit notice in the applicable newspaper. Please complete the following for all received comments:

This form and the accompanying final version of the PTI must be forwarded to the airpti@epa.state.oh.us within 30 days of the end of the comment period or receipt of record of a public meeting if one had been held.

Comments Received (Mark each row as appropriate with an 'X' and enter the appropriate information Add rows as applicable:

<input type="checkbox"/>	No Comments Received	
<input checked="" type="checkbox"/>	James Buckert of Aleris	2/20/2007

Final Recommendation (Mark one row as appropriate):

<input type="checkbox"/>	Approval
<input checked="" type="checkbox"/>	Approval with Changes (Make changes on electronic copy of issued permit)
<input type="checkbox"/>	Denial - Enter Reason for Denial Here

Additional comments:

Parametric monitoring regarding pH and reporting was removed from this permit.

This facility went through a series of opacity violations that were thought to be due to control equipment malfunctions. When the permit was first written, both parametric monitoring and daily opacity check terms were installed in the permit to make sure that a) the facility maintained their control equipment at its optimum control efficiency, and b) that if the control equipment wasn't functioning properly, that they would have both indicators that something was wrong with the controls. The facility's original ranges were given in the PTI application. After the draft was issued, comments were submitted that addressed desired large changes to several of the ranges, making them much wider. The facility was unable to give supporting data that backed the ranges they desired for the monitoring, and moreover, the facility submitted a deviation report that did not comply with the ranges submitted in the comments, so they were removed. Daily opacity check terms were still in place, and CDAQ enforcement and permitting staff were confident that that was sufficient to keep this facility in compliance. The PTI was submitted to Central Office for final

Alumitech of Cleveland, Incorporated
PTI Application: 13-04691
Modification Issued: 8/7/2007

Facility ID: 131800006

issuance. CDAQ asked for the permit back to restore parametric monitoring to the permit. CDAQ met with facility representatives on 7/6/2007. They noted that the minimum values they requested represented a small buffer and that the maximum values represented physical equipment limitations, and further, if pushed to those maximum values, that the control equipment would continue to maintain compliance with all permit limitations. Thus, it was concluded by CDAQ that only the minimum values were needed as parametric monitoring for the W. W. Sly and Venturi scrubbers.

Along the same lines, the opacity limit was also changed from 15% to 20%. Again, the original rationale was to set the limit at 15% to make certain that they maintain their control equipment at its optimum control efficiency. The company asked for the change in submitted comments and after review, the 15% was considered too stringent and the change was deemed acceptable.

All other changes were minor.

Alumitech of Cleveland, Incorporated
PTI Application: 13-04691
Modification Issued: 8/7/2007

Facility ID: 131800006

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL

CERTIFIED MAIL

CUYAHOGA COUNTY

Application No: 13-04691

Fac ID: 1318000062

DATE: 3/13/2007

Alumitech of Cleveland, Incorporated
Randy Collins
4181 Bradley Road
Cleveland, OH 44109

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2500** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Alumitech of Cleveland, Incorporated
PTI Application: 13-04691
Modification Issued: 8/7/2007

Facility ID: 131800006

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

CC: USEPA

CLAA

PA
CUYAHOGA COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 13-04691 FOR AN AIR CONTAMINANT SOURCE
FOR Alumitech of Cleveland, Incorporated

On 3/13/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Alumitech of Cleveland, Incorporated**, located at **4181 Bradley Road, Cleveland, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04691:

Exothermic Dryer -- P901.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue, Cleveland, OH 44114 [(216)664-2324]

Alumitech of Cleveland, Incorporated
PTI Application: 13-04691
Modification Issued: 8/7/2007

Facility ID: 131800006



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 13-04691

Application Number: 13-04691
Facility ID: 1318000062
Permit Fee: **To be entered upon final issuance**
Name of Facility: Alumitech of Cleveland, Incorporated
Person to Contact: Randy Collins
Address: 4181 Bradley Road
Cleveland, OH 44109

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4181 Bradley Road
Cleveland, Ohio**

Description of proposed emissions unit(s):
Exothermic Dryer -- P901.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 emissions unit(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 emissions unit(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

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting 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 (i.e., postmarked) quarterly 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.)

3. 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 this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

Alumitech of Cleveland, Incorporated
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Modification Issued: 8/7/2007

Facility ID: 131800006

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 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.

5. 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 units 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 the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation

Alumitech of Cleveland, Incorporated
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or modification. 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.

9. Construction of New Sources(s)

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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 cannot meet the requirements of this permit or cannot meet applicable standards.

10. 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.

11. Applicability

Alumitech of Cleveland, Incorporated
PTI Application: 13-04691
Modification Issued: 8/7/2007

Facility ID: 131800006

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

13. Source Operation and Operating Permit Requirements 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. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. 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.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

Alumitech of Cleveland, Incorporated
PTI Application: 13-04691
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Facility ID: 131800006

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	24.09
CO	1.80
NOx	2.15

Modification Issued: 8/7/2007

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (P910) - Rotary Exothermic Dryer, with feed end controlled by Venturi and W. W. Sly scrubbers (in series) and discharge end controlled by Standard Havens baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) from scrubbers stack (feed end of dryer) shall not exceed 3.5 lbs PE/hour and 15.33 tons PE/year.</p> <p>PE from baghouse (discharge end of dryer) shall not exceed 2.0 lbs PE/hour and 8.76 tons PE/year.</p> <p>NOx emissions from the combustion of natural gas shall not exceed 0.49 lbs NOx/hour and 2.15 tons NOx/year.</p> <p>CO emissions from the combustion of natural gas shall not exceed 0.40 lbs CO/hour and 1.80 tons CO/year.</p> <p>Visible particulate stack emissions from any stack shall not exceed fifteen percent opacity, as a 6-minute average.</p>
OAC rule 3745-17-07(A)(1)	<p>The opacity limitation specified by this rule is less stringent than OAC rule 3745-31-05(A)(3).</p> <p>Visible particulate stack emissions from any stack shall not exceed twenty percent opacity, as a 6-minute average.</p>
OAC rule 3745-17-11(B)	The emissions limitation specified by this rule is less stringent than OAC rule 3745-31-05(A)(3).
OAC rule 3745-114-01	Air Toxics - see Sections C.7 and C.8 below.

2. Additional Terms and Conditions

Modification Issued: 8/7/2007

- 2.a** The allowable emission limits for PE, CO, and NOx are set at potential to emit; Therefore, monitoring, recordkeeping, and reporting are not needed to show compliance with these emission limits.

B. Operational Restrictions

1. The permittee shall only burn natural gas as fuel in this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. 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 stacks 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.
2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop across the baghouse, the pressure drops across each of the two scrubbers, **and** the scrubber water flow rates of each of the two scrubbers, ~~and the pHs of the scrubber liquors of each of the two scrubbers~~ during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse, the pressure drops across each of the two scrubbers, **and** the scrubber water flow rates of each of the two scrubbers, ~~and the pHs of the scrubber liquors of each of the two scrubbers~~ on a daily basis.
3. Whenever the monitored value for the pressure drop across the baghouse, the pressure drops across each of the two scrubbers, **and** the scrubber water flow rates of each of the two scrubbers, ~~and the pHs of the scrubber liquors of each of the two scrubbers~~ deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the

Emissions Unit ID: **P910**

following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

4. In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable ranges and values specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings, **and** water flow rates, ~~and pH readings~~ immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.
5. The acceptable range for the pressure drop across the baghouse is 2.0 to ~~6.0~~ **12.0** inches of water. The acceptable ~~range~~ **minimum value** for the pressure drop across the W. W. Sly scrubber is ~~4.0 to 6.0~~ inches of water and ~~5.0 to 22.0~~ **10.0** for the Venturi scrubber. The acceptable flow rate ~~range~~ **minimum value** for ~~each of the scrubbers~~ **the W. W. Sly scrubber** is ~~30-75~~ **16.0** gallons per minute **and 72.0 for the Venturi scrubber**. The acceptable pH range for each of the scrubbers is ~~6.0 to 10.0~~.
6. These ranges and values are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the ranges and values based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the ranges and values will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.
7. The permit to install for this emissions unit P910 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year

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using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant : Ammonia (CAS No. 7664-41-7)

TLV (mg/m³): 17.41

Maximum Hourly Emission Rate (lbs/hr): 0.91

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 32.86

MAGLC (ug/m³): 414.5

8. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
9. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland Division of Air Quality (Cleveland DAQ) by January 31 and July 31 of each year and shall cover the previous 6-month period.

The permittee may, upon receipt of written approval from the Cleveland DAQ, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified visible emissions check frequencies would be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - ~~a.~~ ~~each period of time when the pressure drop across the baghouse was outside of the range specified by the manufacturer;~~
 - ~~b.~~ ~~a.~~ all periods of time during which the **pressure drop across the baghouse, the** static pressure across each of the two scrubbers, the scrubber water flow rates of each of the two scrubbers, ~~and/or the scrubber liquor pHs of each of the two scrubbers~~ did not comply with the levels **and values** indicated above;
 - ~~c.~~ ~~b.~~ an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - ~~d.~~ ~~c.~~ an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - ~~e.~~ ~~d.~~ an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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3. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted to the Cleveland DAQ within 30 days after the deviation occurs.

E. Testing Requirements

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

a. Emission Limitation:

3.5 lbs PE/hr from scrubbers stack (feed end **of dryer**)

2.0 lbs PE/hr from baghouse stack (discharge end **of dryer**)

Applicable Compliance Method:

Compliance with the PE limitation shall be determined through emission testing conducted in accordance with U.S. EPA Methods 1 through 5 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

15.33 TPY PE from scrubbers stack (feed end **of dryer**)

8.76 TPY PE from baghouse stack (discharge end **of dryer**)

Applicable Compliance Method:

The tons/year limitations were developed by multiplying the pound/hour by 8,760 hours/year, and dividing by 2,000 pounds/ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed ~~15~~ **20**% opacity, as

a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in U.S. EPA Reference Method 9.

d. Emissions Limitation:

0.49 lb NO_x / hour from the 5 mmBtu/hour natural gas fired burner

Applicable Compliance Method:

The emission factor used for this calculation (100 lbs NO_x/mmcf) was taken from Section 1.4 ("Natural Gas Consumption") of AP-42, Fifth Edition, Volume 1, Chapter 1. The maximum hourly emission rate was determined as follows:

$$(100 \text{ lbs NO}_x/\text{mmcf}) \times (1 \text{ cf}/1,020 \text{ Btu}) \times (5 \text{ mmBtu}/\text{hour}) = 0.49 \text{ lb NO}_x/\text{hour}$$

If required by the Ohio EPA or Cleveland DAQ, compliance with allowable NO_x limit shall be determined in accordance with U.S. EPA Reference Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A.

e. Emissions Limitation:

2.15 tons NO_x / year from the 5 mmBtu/hour natural gas fired burner

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

f. Emissions Limitation:

0.40 lb CO / hour from the 5 mmBtu/hour natural gas fired burner

Applicable Compliance Method:

The emission factor used for this calculation (84 lb CO/mmcf) was taken from Section 1.4 ("Natural Gas Consumption") of AP-42, Fifth Edition, Volume 1, Chapter 1. The maximum hourly emission rate was determined as follows:

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$$(84 \text{ lbs CO/mmcf}) \times (1 \text{ cf}/1,020 \text{ Btu}) \times (5 \text{ mmBtu}/\text{hour}) = 0.40 \text{ lb CO}/\text{hour}$$

If required by the Ohio EPA or Cleveland DAQ, compliance with allowable CO limit shall be determined in accordance with U.S. EPA Reference Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A.

- g. Emissions Limitation:
1.80 tons CO / year from the 5 mmBtu/hour natural gas fired burner

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

2. The permittee shall conduct, or have conducted, emission testing for both control devices serving this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted on the baghouse stack and the scrubbers stack within 3 months after issuance of the permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE for the baghouse and scrubbers, respectively, in the appropriate averaging period(s).
 - c. The following test method(s) shall be employed on the baghouse and the scrubbers stack to demonstrate compliance with the allowable mass emission rate(s):

PE: Method 5 of 40 CFR Part 60, Appendix A.

Opacity: Method 9 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Cleveland DAQ.

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The control efficiencies (i.e., the percent reduction in mass emissions between the inlets and outlets of the control systems) from each control device shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near **within 90% of** its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. 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 Cleveland DAQ's refusal to accept the results of the emission test(s).
- f. Personnel from the Cleveland DAQ 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.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

F. Miscellaneous Requirements

None