



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 13-02897

Fac ID: 1318001287

DATE: 11/12/2004

Wabash Alloys, L.L.C.
David Trickel
4365 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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission 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 within thirty (30) days after the notice of the Directors 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. 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

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: 11/12/2004
Effective Date: 11/12/2004**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 13-02897

Application Number: 13-02897
Facility ID: 1318001287
Permit Fee: **\$0**
Name of Facility: Wabash Alloys, L.L.C.
Person to Contact: David Trickel
Address: 4365 Bradley Road
Cleveland, OH 44109

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4365 Bradley Road
Cleveland, Ohio**

Description of proposed emissions unit(s):
To modify P020 (aluminum scrap shredder) emission limits and terms and conditions as a result of an appeal.

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

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition

declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

11. 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.

12. 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.

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B. State Only Enforceable 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 of state-only enforceable 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 state-only required 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.)

3. 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.

4. 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

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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.

5. 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.

6. 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.

7. Applicability

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This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>PE</u>	<u>8.89</u>

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart RRR (NESHAP for Secondary Aluminum Production), in accordance with 40 CFR Parts 63.1500 through 63.1519, including the Table(s) and Appendix(ices) referenced in Subpart RRR, which are included in the text of Attachment 1 hereto, and are hereby incorporated into this permit as if fully rewritten.

Ordinarily, these requirements would be incorporated into this permit; however, incorporating Subpart RRR into the permit was not practical due to technical incompatibilities and the limitations of the PTI and STARS programs. In addition, numerous difficulties were encountered in attempting to copy and paste the Subpart's tables and/or equations into STARS and the PTI formats.

The following emissions unit in this permit is subject to the aforementioned requirements: emissions unit P020.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

PART III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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	Applicable Rules/Requirements
P020 - Aluminum scrap shredder No. 2 equipped with vibrating conveyors, belt conveyors, iron separation magnets and controlled with a baghouse equipped with a bag leak detection system. (Administrative Modification)	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)(1) OAC rule 3745-17-07(B)(1) 40 CFR Part 63, Subpart RRR OAC rule 3745-17-08(B)

Waba:

PTI A

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Emissions Unit ID: P020

<p>Applicable Emissions Limitations/Control Measures</p>	<p>RACM includes compliance with 40 CFR Part 63, Subpart RRR.</p>
<p>Particulate emissions (PE) from the baghouse stack shall not exceed</p>	<p>The PE limitation specified by this rule is less stringent than the PE limitations established pursuant to OAC rule 3745-31-05(A)(3).</p>
<p>1.72 lbs of PE/hr, and 7.52 tons of PE/yr.</p>	<p>The visible PE limitation specified by this rule is less stringent than the bag leak detection requirements of 40 CFR Part 63, Subpart RRR.</p>
<p>Fugitive dust emissions shall not exceed 1.37 tons of PE/yr.</p>	<p>The visible fugitive dust emission limitation specified by this rule is less stringent than the visible fugitive emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
<p>The 40 CFR Part 63, Subpart RRR requirement of a bag leak detector replaces a stack opacity limit.</p>	<p>Pursuant to 40 CFR Part 63.1505(b)(1), PE shall not exceed 0.010 grain/dscf.</p>
<p>Visible emissions of fugitive dust from any part of the emissions unit or control equipment, excluding the baghouse stack, shall not exceed 10% opacity as a 3-minute average.</p>	<p>The requirements of 40 CFR Part 63, Subpart RRR (in Attachment 1 of this permit) are applicable to this emissions unit.</p>
<p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-08(B) and 40 CFR Part 63, Subpart RRR.</p>	
<p>The permittee shall minimize or eliminate visible emissions of fugitive dust through the employment of reasonably available control measures (RACM) as described in Section A.I.2 below.</p>	

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Emissions Unit ID: P020

2. Additional Terms and Conditions

- 2.a** The permittee shall operate and maintain a system for the capture and collection of emissions that meets the engineering standards for minimum exhaust rates as published by the American Conference of Government Industrial Hygienists in Chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice" (incorporated by reference in 40 CFR 63.1502. The capture and collection system shall be sufficient to minimize or eliminate visible emissions of fugitive dust from this emissions unit.
- 2.b** The design, installation, venting and operation of the capture/collection must comply with the requirements of 40 CFR Part 63, Subpart RRR: Parts 63.1506(c)(1), (2) & (3).

II. Operational Restrictions

1. The bag leak detection system must be operated in accordance with the requirements of 40 CFR Part 63.1506(e)(1), Subpart RRR.
2. The maximum process weight rate shall not exceed 25 tons per hour.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day:
 - a. the total process weight, in tons;
 - b. the actual operating hours (actual hours of shredding) of the shredder; and
 - c. the average hourly process weight rate, in tons per hour, determined by dividing the tons per day by the hours of shredding per day.
2. The permittee shall perform daily checks, when the emissions unit is processing materials and when the weather conditions allow, for any visible emissions of fugitive dust (excluding uncombined water vapor) from the non-stack egress points (e.g., windows, doors, roof monitors) serving this emissions unit. The presence or absence of any visible emissions shall be recorded electronically or in an operations log. If visible emissions are observed, the permittee shall also record the following:
 - a. the location and 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.
3. Monitoring and record keeping shall be performed in accordance with the requirements of 40 CFR Parts 63.1510(a), (b), (d), (f)(1) and 63.1517(a), (b)(1), (b)(4), (b)(14), (b)(15) & (b)(16). For 63.1517(b)(15), the alternate test method duration was approved by US EPA to be changed from 3 hours to one hour, provided the process is continuous (which it is) and an adequate sample is collected.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average hourly process weight rate, in tons per hour, for each day, exceeded the maximum process weight rate specified in Section A.II.2 of this permit.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

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2. The permittee shall submit semiannual written reports that:
 - a. identify all days during which any visible emissions of fugitive dust were observed from the non-stack egress points serving this emissions unit; and
 - b. describe any corrective actions taken to eliminate the visible emissions.

These reports shall be submitted to the Cleveland Division of Air Quality by March 1 and August 29 of each year and shall cover the previous 6 month calendar period.

3. The permittee shall submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
4. Reporting shall be performed in accordance with applicable requirements in 40 CFR Parts 63.1515 (a) and (b) and Parts 63.1516 (a), (b)(1), (b)(3), and (c) in Attachment 1 of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

Visible emissions of fugitive dust from any part of the emissions unit or control equipment, excluding the baghouse stack, shall not exceed 10% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, for any non-stack egress point (e.g. windows, doors, roof monitors) serving this emissions unit.

- 1.b Emission Limitations:

PE shall not exceed 0.010 grain/dscf, from the stack serving the baghouse.

Waba:

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Emissions Unit ID: P020

Applicable Compliance Method:

Compliance with the grain loading and PE limitation shall be demonstrated through emission testing meeting the applicable requirements of 40 CFR Parts 63.1511 through 63.1513.

1.c Emission Limitation:

PE shall not exceed 1.72 lbs/hr.

Applicable Compliance Method:

If required, compliance shall be demonstrated by stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

An alternate test procedure, 40 CFR Part 63.1517(b)(15), was approved by US EPA to change the duration of each run in US EPA Reference Method 5 from a minimum of three (3) hours to a minimum of one (1) hour per run provided the process is continuous (which it is) and an adequate amount of sample is collected.

1.d Emission Limitation:

PE shall not exceed 7.52 tons/year.

Applicable Compliance Method:

The annual limitation was established by multiplying the hourly PE limitation, 0.010 grain/dscf by the air volume (in cfm), by 60 minutes per hour, by 7,000 grains per pound and by 8,760 hrs/year, and then dividing by 2,000 lbs/ton.

Compliance with the annual emission limitation may be assumed provided that the permittee maintains compliance with the outlet grain loading concentration and the air volume is less than our equal 20,026 dscfm.

1.e Emission Limitation:

Fugitive dust emissions shall not exceed 1.37 tons of PE/year.

Applicable Compliance Method:

Compliance with the annual emission limitation may be assumed because the emissions are based on the potential annual charge rate of the two furnaces (131,400 tons), an emission factor developed from a Wabash stack test (2.08 lb/ton of scrap) and an estimated capture rate of 99%.

2. Performance testing shall be performed in accordance with the following requirements of 40 CFR Part 63, Subpart RRR, Parts 63.1511(a) through (e) & (g); 1512 (a), (p), (q) & (s), and 63.1513 (b).

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Waba:

PTI A

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Emissions Unit ID: P020

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P020 - Aluminum scrap shredder No. 2 equipped with vibrating conveyors, belt conveyors, iron separation magnets, and controlled with a baghouse equipped with a bag leak detection system. (Administrative Modification)	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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None

VI. Miscellaneous Requirements

None