



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: 13-02327**

**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 13-02327

Application Number: 13-02327  
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):  
**Modify some certain emission limits and terms and conditions to address the facility appeal to the Environmental Board of Review.**

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

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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**

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)**

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	43.52
PM10	35.5
NO <sub>x</sub>	36.6
CO	50.4
VOC	50.6
SO <sub>2</sub>	9.2
Pb	0.36

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**Waba:**

**PTI A**

**Modification Issued: 11/12/2004**

**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 PTI formats.

The following emissions units in this permit are subject to the aforementioned requirements: emissions units P912, and P913.

**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 Emission Limitations and/or Control Requirements**

- 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 emission 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.

<b>Operations, Property, and/or Equipment</b>	<b>Applicable Rules/Requirements</b>
<p>(P912) 110-ton (aluminum holding capacity), reverberatory furnace (Furnace No. 2) equipped with an enclosed hood with doors. (The hood captures emissions generated by charging, melting, fluxing, skimming, and chlorine gas demagging operations. A blower draws these captured emissions from the top of the hood and discharges them into a baghouse shared by Furnaces No. 2 and 4. Furnace No. 2 has two natural gas-fired burners with a maximum total heat input capacity of 24 mmBtu/hr. This emissions unit is a Group 1 Furnace with a sidewall and is part of a SAPU.) (Modification)</p>	<p>OAC rule 3745-31-05(A)(3)</p>

Waba:

PTI A

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Emissions Unit ID: P912

	<b>Applicable Emission Limitations/Control Measures</b>	
OAC rule 3745-17-11(B)(1)		Nitrogen oxides emissions from this emissions unit shall not exceed 4.17 lbs/hr and 18.3 tons/year.
OAC rule 3745-17-07(A)(1)	Particulate emissions (PE) and particulate matter emissions less than 10 microns in diameter (PM10 emissions) from the baghouse stack serving this emissions unit and P913 (Furnace No. 4) shall not exceed 0.40 lb/ton of feed.	Carbon monoxide emissions from this emissions unit shall not exceed 5.75 lbs/hr and 25.2 tons/year. Volatile organic compound emissions from this emissions unit shall not exceed 5.77 lbs/hr and 25.3 tons/year.
OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed 10% opacity as a 3-minute average from any non-stack egress point at this emissions unit.	Sulfur dioxide emissions from this emissions unit shall not exceed 1.06 lbs/hr and 4.6 tons/year.
OAC rule 3745-17-08(B)	PE and PM10 emissions from the combustion stack serving this emissions unit shall not exceed 1.8 lbs/hr and 0.96 lb/hr, respectively.	Lead emissions from this emissions unit shall not exceed 0.04 lb/hr and 0.18 ton/year.
OAC rule 3745-18-06(E)(1)	PE and PM10 emissions from the baghouse stack serving emissions units P912 and P913 shall not exceed 6 lbs/hr and 26.3 tons/yr, combined.	The permittee shall employ best available control measures to minimize or eliminate visible emissions of fugitive dust. See A.I.2.a through A.I.2.c below.
OAC rules 3745-21-08(B) and 3745-23-06(B)	PE and PM10 emissions from the combustion stack serving this emissions unit shall not exceed 7.9 tons/yr and 4.2 tons/yr, respectively.	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B) and 3745-23-06(B) and 40 CFR Part 63, Subpart RRR.
40 CFR Part 63, Subpart RRR	Fugitive dust emissions from this emissions unit shall not exceed 0.16 lb/hr and 0.71 ton/yr.	The PE limitation specified in this rule is less stringent than the particulate emission limitations established pursuant to 40 CFR Part 63, Subpart RRR and OAC rule 3745-31-05(A)(3).
	Fugitive PM10 emissions from this emissions unit shall not exceed 0.10 lb/hr and 0.43 ton/yr.	The visible PE limitation specified by this rule is less stringent than the bag leak detection requirements of 40 CFR Part

63, Subpart RRR.

The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The control requirements specified or established by this rule are equivalent to or less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).

The sulfur dioxide emission limitation specified by this rule is less stringent than the sulfur dioxide emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

See A.I.2.d below.

See 40 CFR Part 63.1505 in Attachment 1 of this permit and A.I.2.f below.

## **2. Additional Terms and Conditions**

- 2.a** The permittee shall operate and maintain a system for the capture and collection of particulate emissions from this emissions unit that meets the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapter 3 and 5 of "Industrial Ventilation: A Manual Recommended Practice," as incorporated in 40 CFR 63.1506(c). The system shall be sufficient to minimize or eliminate visible emissions of fugitive dust from this emissions unit.
- 2.b** The permittee shall employ procedures for the unloading and disposal of the dust collected in the baghouse to minimize or eliminate visible emissions from any dust that may become accumulated underneath the baghouse. These procedures shall include the expeditious

elimination of the cause of the dust spill and the removal of the accumulated dust.

- 2.c** The hot dross skimmings, skimmed from the charging well of the furnace, shall be cooled in an enclosed area that is controlled by the baghouse until all visible particulate emissions from the hot dross skimmings cease.
- 2.d** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3). On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.e** This emissions unit and its associated air pollution control system(s) shall be maintained regularly in accordance with the Operation, Maintenance, and Monitoring Plan required under 40 CFR 63, Subpart RRR in order to minimize air contaminant emissions.
- 2.f** Particulates, dioxin/furan, and HCl shall not exceed the emission limitations in 40 CFR 63.1505(i)(1), (3), (4), and (6); or 63.1505 (k)(1), (2), (3), and (4).

## II. Operational Restrictions

1. The maximum process weight rate for this emissions unit shall not exceed 7.5 tons per hour.
2. The permittee shall employ only natural gas to fire the furnace burners associated with this emissions unit.
3. The permittee shall comply with the applicable restrictions required under 40 CFR 63, Subpart RRR, Parts 63.1506 (a), (b)(1 and 2), (c), (d)(1 and 2), (m)(1,3,4,5, and 6), and (p) governing: feed/charge weight, the installation, operation and maintenance of a bag leak detection system, and chlorine injection. See 40 CFR 63.1506 in Attachment 1 of this permit.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. the total process weight, in tons;
  - b. the actual operating hours of the furnace; and
  - c. the average hourly process weight rate, in tons per hour, determined by dividing the tons per day by the hours of operation per day.
2. The permittee shall perform weekly 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, etc.) 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. 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.
4. The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63, Subpart RRR, including 40 CFR Part 63.1510 (a) - (e), (f)(1), (h) - (j), (n), (s), (t) or (u), (v) and, (w); and Part 63.1515 (a)(2) - (7), (b)(1) - (6) and (10); 63.1517 (a), (b)(1)(i), (b)(3) - (7), (b)(10), (b)(13) - (17). See 40 CFR Parts 63.1510 and 63.1517, respectively, in Attachment 1 of this permit.

Note: For Part 63.1510, (t) may be used if meeting the SAPU limits or (u) may be used if meeting

the Group I furnace limits.

#### 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.1 of this permit.
2. The permittee shall submit semiannual written reports that identify all periods of time when a fuel other than natural gas was fired in the furnace burners serving this emissions unit. These reports shall be submitted to the Cleveland Division of Air Quality (Cleveland DAQ) by March 1 and August 29 of each year and shall cover the previous 6-month calendar period.
3. 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 DAQ by March 1 and August 29 of each year and shall cover the previous 6-month calendar period.

4. The permittee shall submit annual reports that specify the total particulate and PM10 emissions (for the baghouse stack and combustion stack), nitrogen oxides, carbon monoxide, volatile organic compound, sulfur dioxide, and lead emissions, in tons, 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 Emissions Report.
5. The permittee shall submit semiannual reports and such other notifications and reports as are required pursuant to 40 CFR Parts 63.1516 (a), (b)(1)(i), (b)(1)(iv) - (vii), (b)(2)(iii), (b)(3), and (c) in Attachment 1 of this permit.

#### V. 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):
  - 1.a Short-Term Emission Limitations for PE and PM10 emissions:

Baghouse Stack:

PE and PM10 emissions from the baghouse stack serving this emissions unit and emissions unit P913 (Furnace No. 4) shall not exceed 0.40 lb/ton of feed/charge, combined.

Emissions Unit ID: **P912****Applicable Compliance Method:**

The PE and PM10 emission limitations for the baghouse stack serving emissions units P912 and P913 were established based upon the NESHAP emission limitation (0.40 lb/ton) prescribed for PE in 40 CFR 63.1505(i)(1).

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR 63.1511 and 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternate U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA. The emission tests shall be conducted with emissions units P912 and P913 operating at the highest production level with charge materials representative of the range of materials processed by the unit and at the highest reactive fluxing rate, unless otherwise approved by the Cleveland DAQ and/or Ohio EPA.

**Combustion Stack:**

PE and PM10 from the combustion stack serving this emissions unit shall not exceed 1.8 lbs/hr and 0.96 lb/hr, respectively.

**Applicable Compliance Method:**

The hourly PE limitation for the combustion stack serving this emissions unit was established by multiplying an emission factor from testing on a similar emissions unit (0.24 lb of PE/ton of material processed ) by the emissions unit's maximum material process weight rate (7.5 tons/hr). The hourly PM10 emission limitation for the combustion stack was established by multiplying an emission factor for natural gas combustion, specified in USEPA reference document AP-42, Fifth Edition, of 42 lbs of PM10 emissions/mmscf by the emissions unit's maximum hourly fuel consumption rate (0.023 mmscf/hr).

If required, the permittee shall demonstrate compliance with the PE and PM10 emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 (for PE), and Methods 1 through 4, and 201 or 202 (for PM10). Alternate U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA. The tests shall be conducted while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA and/or the Cleveland DAQ.

**1.b Baghouse PE and PM10 Emission Limitations:**

PE and PM10 emissions from the baghouse stack serving this emissions unit shall not exceed 6.0 lbs/hour from P912 and P913 combined.

PE and PM10 emissions from the baghouse stack serving this emissions unit shall not exceed 26.3 tons/year from P912 and P913 combined.

**Applicable Compliance Method:**

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The hourly PE and PM10 emission limitation was established by multiplying the maximum charge rate (15 tons/hour for both furnaces combined) by the PE factor (0.40 lb/ton).

The annual PE and PM10 emission limitation was established by multiplying the hourly PE and PM10 emission limitation by the maximum annual operating hours (8,760 hrs/year), and then dividing by 2000 lbs/ton.

Compliance with the annual emission PE and PM10 emission limitation is ensured while compliance is maintained with the hourly PE and PM10 emission limitation.

1.c Emission Limitation:

Visible emissions of fugitive dust shall not exceed 10% opacity as a 3-minute average from any non-stack egress point for the emissions unit.

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.

1.d Emission Limitations:

Nitrogen oxides emissions from this emissions unit shall not exceed 4.17 lbs/hr and 18.3 tons/year.

Applicable Compliance Method:

Compliance with these emission limitations is based upon a summation of the nitrogen oxides emissions from the combustion stack serving this emissions unit and the nitrogen oxides emissions from the baghouse stack serving this emissions unit.

Compliance with the hourly emission limitation may be determined using emission factor calculations for the nitrogen oxides emissions from the combustion and baghouse stacks. The emissions from the combustion stack may be determined by multiplying an emission factor of 100 lbs of nitrogen oxides/mmscf by the emissions unit's maximum hourly fuel consumption rate (0.023mmscf/hr). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 (7/98). The emissions from the baghouse stack may be determined by multiplying an emission factor of 0.25 lb of nitrogen oxides/ton of material processed by the emissions unit's maximum process weight rate (7.5 tons/hr). This emission factor was derived from emission tests conducted on a similar emissions unit at another facility owned and operated by the permittee.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and 7E. The emission tests shall be conducted simultaneously at the combustion stack and baghouse stack outlets while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ. If this emissions unit and emissions unit P913 are both in operation during the emission tests and the total measured nitrogen oxides emissions from the combustion stacks serving each emissions unit and the baghouse stack are less than the summation of the hourly nitrogen oxides emission limitations for emissions units P912 and P913, compliance with the hourly emission limitations will be demonstrated.

The annual emission limitation was established by multiplying the hourly emission limitation (4.17 lbs/hr) by the annual operating hours (8,760 hrs/year), and dividing by 2,000 (lbs/ton). Compliance with the annual emission limitation is ensured while compliance is maintained with the hourly emission limitation.

1.e Emission Limitations:

Carbon monoxide emissions from this emissions unit shall not exceed 5.75 lbs/hr and 25.2 tons/year.

Applicable Compliance Method:

Compliance with these emission limitations is based upon a summation of the carbon monoxide emissions from the combustion stack serving this emissions unit and the carbon monoxide emissions from the baghouse stack serving this emissions unit.

Compliance with the hourly emission limitation may be determined using emission factor calculations for the carbon monoxide emissions from the combustion and baghouse stacks. The emissions from the combustion stack may be determined by multiplying an emission factor of 84 lbs of carbon monoxide/scf by the emissions unit's maximum hourly fuel consumption rate (0.023mmscf/hr). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 (7/98). The emissions from the baghouse stack may be determined by multiplying an emission factor of 0.51 lb of carbon monoxide/ton of material processed by the emissions unit's maximum process weight rate (7.5 tons/hr). This emission factor was derived from emission tests conducted on a similar emissions unit at another facility owned and operated by the permittee.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and 10. The emission tests shall be conducted simultaneously at the combustion stack and baghouse stack outlets while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.

If this emissions unit and emissions unit P913 are both in operation during the emission tests and the total measured carbon monoxide emissions from the combustion stacks serving each emissions unit and the baghouse stack are less than the summation of the hourly carbon monoxide emission limitations for emissions units P912 and P913, compliance with the hourly emission limitations will be demonstrated.

The annual emission limitation was established by multiplying the hourly emission limitation (5.75 lbs/hr) by the annual operating hours (8,760 hrs/year), and dividing by 2,000 (lbs/ton). Compliance with the annual emission limitation is ensured while compliance is maintained with the hourly emission limitation.

1.f Emission Limitations:

Volatile organic compound emissions from this emissions unit shall not exceed 5.77 lbs/hr and 25.3 tons/year.

Applicable Compliance Method:

Compliance with these emission limitations is based upon a summation of the volatile organic compound emissions from the combustion stack serving this emissions unit and the volatile organic compound emissions from the baghouse stack serving this emissions unit.

Compliance with the hourly emission limitation may be determined using emission factor calculations for the volatile organic compound emissions from the combustion and baghouse

stacks. The emissions from the combustion stack may be determined by multiplying an emission factor of 5.5 lbs of volatile organic compounds/mmscf by the emissions unit's maximum hourly fuel consumption rate (0.023mmscf/hr). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98). The emissions from the baghouse stack may be determined by multiplying an emission factor of 0.75 lb of volatile organic compounds/ton of material processed by the emissions unit's maximum process weight rate (7.5 tons/hr). This emission factor was derived from emission tests conducted on a similar emissions unit at another facility owned and operated by the permittee.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A, as appropriate. The emission tests shall be conducted simultaneously at the combustion stack and baghouse stack outlets while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.

If this emissions unit and emissions unit P913 are both in operation during the emission tests and the total measured volatile organic compound emissions from the combustion stacks serving each emissions unit and the baghouse stack are less than the summation of the hourly volatile organic compound emission limitations for emissions units P912 and P913, compliance with the hourly emission limitations will be demonstrated.

The annual emission limitation was established by multiplying the hourly emission limitation (5.77 lbs/hr) by the annual operating hours (8,760 hrs/year), and dividing by 2,000 (lbs/ton). Compliance with the annual emission limitation is ensured while compliance is maintained with the hourly emission limitation.

1.g Emission Limitations:

Sulfur dioxide emissions from this emissions unit shall not exceed 1.06 lbs/hr and 4.6 tons/year.

Applicable Compliance Method:

Compliance with these emission limitations is based upon a summation of the sulfur dioxide emissions from the combustion stack serving this emissions unit and the sulfur dioxide emissions from the baghouse stack serving this emissions unit.

Compliance with the hourly emission limitation may be determined using emission factor calculations for the sulfur dioxide emissions from the combustion and baghouse stacks. The emissions from the combustion stack may be determined by multiplying an emission factor of

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0.006 lb of sulfur dioxide/ton of material processed by the emissions unit's maximum process weight rate (7.5 tons/hr). This emission factor was derived from emission tests conducted on a similar emissions unit at another facility owned and operated by the permittee. The emissions from the baghouse stack may be determined by multiplying an emission factor of 0.135 lb of sulfur dioxide/ ton of material processed by the emissions unit's maximum process weight rate (7.5 tons/hr). This emission factor was derived from emission tests conducted on a similar emissions unit at another facility owned and operated by the permittee.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and 6. The emission tests shall be conducted simultaneously at the combustion stack and baghouse stack outlets while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.

If this emissions unit and emissions unit P913 are both in operation during the emission tests and the total measured sulfur dioxide emissions from the combustion stacks serving each emissions unit and the baghouse stack are less than the summation of the hourly sulfur dioxide emission limitations for emissions units P912 and P913, compliance with the hourly emission limitations will be demonstrated.

The annual emission limitation was established by multiplying the hourly emission limitation (1.06 lbs/hr) by the annual operating hours (8,760 hrs/year), and dividing by 2,000 (lbs/ton). Compliance with the annual emission limitation is ensured while compliance is maintained with the hourly emission limitation.

1.h Emission Limitations:

Lead emissions from this emissions unit shall not exceed 0.04 lb/hr and 0.18 ton/year.

Applicable Compliance Method:

Compliance with these emission limitations is based upon a summation of the lead emissions from the combustion stack serving this emissions unit and the lead emissions from the baghouse stack serving this emissions unit.

Compliance with the hourly emission limitation may be determined using emission factor calculations for the lead emissions from the combustion and baghouse stacks. The emissions from the combustion stack may be determined by multiplying an emission factor of 0.0036 lb of lead/ton of material processed by the emissions unit's maximum process weight rate (7.5 tons/hr). This emission factor was derived from emission tests conducted on a similar emissions unit at another facility owned and operated by the permittee. The emissions from the baghouse stack may be determined by multiplying an emission factor of 0.00174 lb of lead/ ton of material processed by the emissions unit's maximum process weight rate (7.5 tons/hr). This emission factor was derived from emission tests conducted on a similar emissions unit at another facility owned and operated by the permittee.

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If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and 12. The emission tests shall be conducted simultaneously at the combustion stack and baghouse stack outlets while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.

If this emissions unit and emissions unit P913 are both in operation during the emission tests and the total measured lead emissions from the combustion stacks serving each emissions unit and the baghouse stack are less than the summation of the hourly lead emission limitations for emissions units P912 and P913, compliance with the hourly emission limitations will be demonstrated.

The annual emission limitation was established by multiplying the hourly emission limitation (0.04 lb/hr) by the annual operating hours (8,760 hrs/year), and dividing by 2,000 (lbs/ton). Compliance with the annual emission limitation is ensured while compliance is maintained with the hourly emission limitation.

1.i Emission Limitation:

Fugitive dust emissions from this emissions unit shall not exceed 0.16 lb/hr and 0.71 tons/year.

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the emission factor of 4.3 lbs/ton of metal (FIRE v. 6.23, SCC 3-04-001-03) by the maximum process weight rate (7.5 tons/hr) and by one minus the estimated capture rate of 99.5% (1-0.995).

The annual emission limitation was established by multiplying the hourly emission limitation of 0.16 lb/hr by the annual operating hours (8,760 hrs/year) and dividing by 2,000 (lbs/ton). Compliance with the annual emission limitation is ensured while compliance is maintained with the hourly emission limitation.

1.k Emission Limitation

Fugitive PM10 emissions from this emissions unit shall not exceed 0.10 lb/hr and 0.43 ton/year.

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the emission factor of 2.6 lbs/ton of metal (FIRE v. 6.23, SCC 3-04-001-03) by the maximum process weight rate (7.5 tons/hr) and by one minus the assumed capture rate of 99.5% (1-0.995).

The annual emission limitation was established by multiplying the hourly emission limitation of 0.10 lb/hr by the annual operating hours (8,760 hrs/year) and dividing by 2,000 (lbs/ton). Compliance with the annual emission limitation is ensured while compliance is maintained with the hourly emission limitation.

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2. Performance testing shall be performed in accordance with the following requirements of 40 CFR 63, Subpart RRR: 63.1511 (a) - (e), (g) and (h); 63.1512 (d)(1)(3), (j)(2), (k), and (n) - (s); and 63.1513 (b), (d) and (e).

Note: Part 63.1513 (c) may also be used to determine compliance for HCl limits.

**VI. Miscellaneous Requirements**

None

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**B. State Only Enforceable Section**

**I. Applicable Emission 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 emission 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 Emission Limitations/Control Measures
(P912) 110-ton (aluminum holding capacity), reverberatory furnace (Furnace No. 2) equipped with an enclosed hood with doors. (The hood captures emissions generated by charging, melting, fluxing, skimming, and chlorine gas demagging operations. A blower draws these captured emissions from the top of the hood and discharges them into a baghouse shared by Furnaces Nos. 2 and 4. Furnace No. 2 has two natural gas-fired burners with a maximum total heat input capacity of 24 mmBtu/hr. This emissions unit is a Group 1 Furnace with a sidewell and is part of a SAPU.) (Modification)	None	None

**2. Additional Terms and Conditions**

None

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. This unit became subject to 40 CFR 63, Subpart RRR on March 23, 2004 which regulates the hazardous air pollutants hydrogen chloride and dioxin and furan, and emissions of particulate matter that serve as a measure of total particulate emissions and as a surrogate for metal HAPs contained in the particulates, including but not limited to, antimony, arsenic, beryllium, cadmium, chromium, cobalt, lead, manganese, mercury, nickel and selenium.
2. For pollutants, other than those which are subject to 40 CFR 63, Subpart RRR, which may be identified by the permittee of Ohio EPA to be covered under the Ohio EPS's "Review of New Sources of Air Toxics Emissions" policy ("Air Toxics Policy"), physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - 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.).

If the permittee determines that the "Air Toxics Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts

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evaluations to determine that the changed emissions unit will still satisfy the "Air Toxics Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxics Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxics Policy" for the change.

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emission 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 emission 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.

<b>Operations, Property, and/or Equipment</b>	<b>(Modification)</b>	<b>Applicable Rules/Requirements</b>
<p>(P913) 110-ton (aluminum holding capacity), reverberatory furnace (Furnace No. 4) equipped with an enclosed hood with doors. (The hood captures emissions generated by charging, melting, fluxing, skimming, and chlorine gas demagging operations. A blower draws these captured emissions from the top of the hood and discharges them into a baghouse shared by Furnaces No. 2 and 4. Furnace No. 4 has two natural gas-fired burners with a maximum total heat input capacity of 24 mmBtu/hr. This emissions unit is a Group 1 Furnace with a sidewall and is part of a SAPU.)</p>		OAC rule 3745-31-05(A)(3)

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		<b>Applicable Emission Limitations/Control Measures</b>
	OAC rule 3745-17-07(A)(1)	Particulate emissions (PE) and particulate matter emissions less than 10 microns in diameter (PM10 emissions) from the baghouse stack serving this emissions unit and P912 (Furnace No. 2) shall not exceed 0.40 lb/ton of feed.
	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed 10% opacity as a 3-minute average from any non-stack egress point at this emissions unit.
	OAC rule 3745-17-08(B)	PE and PM10 emissions from the combustion stack serving this emissions unit shall not exceed 1.8 lbs/hr and 0.96 lb/hr, respectively.
	OAC rule 3745-18-06(E)(1)	PE and PM10 emissions from the baghouse stack serving emissions units P912 and P913 shall not exceed 6 lbs/hr and 26.3 tons/yr, combined.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	PE and PM10 emissions from the combustion stack serving this emissions unit shall not exceed 7.9 tons/yr and 4.2 tons/yr, respectively.
	40 CFR Part 63, Subpart RRR	Fugitive dust emissions from this emissions unit shall not exceed 0.16 lb/hr and 0.71 ton/yr.
		Fugitive PM10 emissions from this emissions unit shall not exceed 0.10 lb/hr and 0.43 ton/yr.
		Nitrogen oxides emissions from this emissions unit shall not exceed 4.17 lbs/hr and 18.3 tons/year.
OAC rule 3745-17-11(B)(1)		Carbon monoxide emissions from this emissions unit shall not exceed 5.75 lbs/hr and 25.2 tons/year.

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Volatile organic compound emissions from this emissions unit shall not exceed 5.77 lbs/hr and 25.3 tons/year.

Sulfur dioxide emissions from this emissions unit shall not exceed 1.06 lbs/hr and 4.6 tons/year.

Lead emissions from this emissions unit shall not exceed 0.04 lb/hr and 0.18 ton/year.

The permittee shall employ best available control measures to minimize or eliminate visible emissions of fugitive dust. See A.I.2.a through A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B) and 3745-23-06(B) and 40 CFR Part 63, Subpart RRR.

The PE limitation specified in this rule is less stringent than the particulate emission limitations established pursuant to 40 CFR Part 63, Subpart RRR and OAC rule 3745-31-05(A)(3).

The visible PE limitation

specified by this rule is less stringent than the bag leak detection requirements of 40 CFR Part 63, Subpart RRR.

The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The control requirements specified or established by this rule are equivalent to or less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).

The sulfur dioxide emission limitation specified by this rule is less stringent than the sulfur dioxide emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

See A.I.2.d below.

See 40 CFR Part 63.1505 in Attachment 1 of this permit and A.I.2.f below.

## 2. Additional Terms and Conditions

- 2.a** The permittee shall operate and maintain a system for the capture and collection of particulate emissions from this emissions unit that meets the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapter 3 and 5 of "Industrial Ventilation: A Manual Recommended Practice," as incorporated in 40 CFR 63.1506(c). The system shall be sufficient to minimize or eliminate visible emissions of fugitive dust from this emissions unit.
- 2.b** The permittee shall employ procedures for the unloading and disposal of the dust collected in the baghouse to minimize or eliminate visible emissions from any dust that may become accumulated underneath the baghouse. These procedures shall include the expeditious elimination of the cause of the dust spill and the removal of the accumulated dust.
- 2.c** The hot dross skimmings, skimmed from the charging well of the furnace, shall be cooled in an enclosed area that is controlled by the baghouse until all visible particulate emissions from the hot dross skimmings cease.
- 2.d** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3). On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.e** This emissions unit and its associated air pollution control system(s) shall be maintained regularly in accordance with the Operation, Maintenance, and Monitoring Plan required under 40 CFR 63, Subpart RRR in order to minimize air contaminant emissions.
- 2.f** Particulates, dioxin/furan, and HCl shall not exceed the emission limitations in 40 CFR

63.1505(i)(1), (3), (4), and (6); or 63.1505 (k)(1), (2), (3), and (4).

## II. Operational Restrictions

1. The maximum process weight rate for this emissions unit shall not exceed 7.5 tons per hour.
2. The permittee shall employ only natural gas to fire the furnace burners associated with this emissions unit.
3. The permittee shall comply with the applicable restrictions required under 40 CFR 63, Subpart RRR, Parts 63.1506 (a), (b)(1 and 2), (c), (d)(1 and 2), (m)(1,3,4,5, and 6), and (p) governing: feed/charge weight, the installation, operation and maintenance of a bag leak detection system, and chlorine injection. See 40 CFR 63.1506 in Attachment 1 of this permit.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. the total process weight, in tons;
  - b. the actual operating hours of the furnace; and
  - c. the average hourly process weight rate, in tons per hour, determined by dividing the tons per day by the hours of operation per day.
2. The permittee shall perform weekly 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, etc.) 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. 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.

4. The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR 63, Subpart RRR, including 40 CFR Part 63.1510 (a) - (e), (f)(1), (h) - (j), (n), (s), (t) or (u), (v) and, (w); and Part 63.1515 (a)(2) - (7), (b)(1) - (6) and (10); 63.1517 (a), (b)(1)(i), (b)(3) - (7), (b)(10), (b)(13) - (17). See 40 CFR Parts 63.1510 and 63.1517, respectively, in Attachment 1 of this permit.

Note: For Part 63.1510, (t) may be used if meeting the SAPU limits or (u) may be used if meeting the Group I furnace limits.

#### 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.1 of this permit.
2. The permittee shall submit semiannual written reports that identify all periods of time when a fuel other than natural gas was fired in the furnace burners serving this emissions unit. These reports shall be submitted to the Cleveland Division of Air Quality (Cleveland DAQ) by March 1 and August 29 of each year and shall cover the previous 6-month calendar period.
3. 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 DAQ by March 1 and August 29 of each year and shall cover the previous 6-month calendar period.

4. The permittee shall submit annual reports that specify the total particulate and PM10 emissions (for the baghouse stack and combustion stack), nitrogen oxides, carbon monoxide, volatile organic compound, sulfur dioxide, and lead emissions, in tons, 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 Emissions Report.
5. The permittee shall submit semiannual reports and such other notifications and reports as are required pursuant to 40 CFR Parts 63.1516 (a), (b)(1)(i), (b)(1)(iv) - (vii), (b)(2)(iii), (b)(3), and

(c) in Attachment 1 of this permit.

## V. 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):

1.a Short-Term Emission Limitations for PE and PM10 emissions:

Baghouse Stack:

PE and PM10 emissions from the baghouse stack serving this emissions unit and emissions unit P912 (Furnace No. 2) shall not exceed 0.40 lb/ton of feed/charge, combined.

Applicable Compliance Method:

The PE and PM10 emission limitations for the baghouse stack serving emissions units P912 and P913 were established based upon the NESHAP emission limitation (0.40 lb/ton) prescribed for PE in 40 CFR 63.1505(i)(1).

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR 63.1511 and 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternate U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA. The emission tests shall be conducted with emissions units P912 and P913 operating at the highest production level with charge materials representative of the range of materials processed by the unit and at the highest reactive fluxing rate, unless otherwise approved by the Cleveland DAQ and/or Ohio EPA.

Combustion Stack:

PE and PM10 from the combustion stack serving this emissions unit shall not exceed 1.8 lbs/hr and 0.96 lb/hr, respectively.

Applicable Compliance Method:

The hourly PE limitation for the combustion stack serving this emissions unit was established by multiplying an emission factor from testing on a similar emissions unit (0.24 lb of PE/ton of material processed ) by the emissions unit's maximum material process weight rate (7.5 tons/hr). The hourly PM10 emission limitation for the combustion stack was established by multiplying an emission factor for natural gas combustion, specified in USEPA reference document AP-42, Fifth Edition, of 42 lbs of PM10 emissions/mmscf by the emissions unit's maximum hourly fuel consumption rate (0.023 mmscf/hr).

If required, the permittee shall demonstrate compliance with the PE and PM10 emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 (for PE), and Methods 1 through 4, and 201 or 202 (for PM10). Alternate

U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA. The tests shall be conducted while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA and/or the Cleveland DAQ.

1.b Baghouse PE and PM10 Emission Limitations:

PE and PM10 emissions from the baghouse stack serving this emissions unit shall not exceed 6.0 lbs/hour from P912 and P913 combined.

PE and PM10 emissions from the baghouse stack serving this emissions unit shall not exceed 26.3 tons/year from P912 and P913 combined.

Applicable Compliance Method:

The hourly PE and PM10 emission limitation was established by multiplying the maximum charge rate (15 tons/hour for both furnaces combined) by the PE factor (0.40 lb/ton).

The annual PE and PM10 emission limitation was established by multiplying the hourly PE and PM10 emission limitation by the maximum annual operating hours (8,760 hrs/year), and then dividing by 2,000 lbs/ton.

Compliance with the annual emission PE and PM10 emission limitation is ensured while compliance is maintained with the hourly PE and PM10 emission limitation.

1.c Emission Limitation:

Visible emissions of fugitive dust shall not exceed 10% opacity as a 3-minute average from any non-stack egress point for the emissions unit.

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.

1.d Emission Limitations:

Nitrogen oxides emissions from this emissions unit shall not exceed 4.17 lbs/hr and 18.3 tons/yr

Applicable Compliance Method:

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Compliance with these emission limitations is based upon a summation of the nitrogen oxides emissions from the combustion stack serving this emissions unit and the nitrogen oxides emissions from the baghouse stack serving this emissions unit.

Compliance with the hourly emission limitation may be determined using emission factor calculations for the nitrogen oxides emissions from the combustion and baghouse stacks. The emissions from the combustion stack may be determined by multiplying an emission factor of 100 lbs of nitrogen oxides/mmscf by the emissions unit's maximum hourly fuel consumption rate (0.023mmscf/hr). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 (7/98). The emissions from the baghouse stack may be determined by multiplying an emission factor of 0.25 lb of nitrogen oxides/ton of material processed by the emissions unit's maximum process weight rate (7.5 tons/hr). This emission factor was derived from emission tests conducted on a similar emissions unit at another facility owned and operated by the permittee.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and 7E. The emission tests shall be conducted simultaneously at the combustion stack and baghouse stack outlets while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ. If this emissions unit and emissions unit P912 are both in operation during the emission tests and the total measured nitrogen oxides emissions from the combustion stacks serving each emissions unit and the baghouse stack are less than the summation of the hourly nitrogen oxides emission limitations for emissions units P912 and P913, compliance with the hourly emission limitations will be demonstrated.

The annual emission limitation was established by multiplying the hourly emission limitation (4.17 lbs/hr) by the annual operating hours (8,760 hrs/year), and dividing by 2,000 (lbs/ton). Compliance with the annual emission limitation is ensured while compliance is maintained with the hourly emission limitation.

1.e Emission Limitations:

Carbon monoxide emissions from this emissions unit shall not exceed 5.75 lbs/hr and 25.2 tons/year.

Applicable Compliance Method:

Compliance with these emission limitations is based upon a summation of the carbon monoxide emissions from the combustion stack serving this emissions unit and the carbon monoxide emissions from the baghouse stack serving this emissions unit.

Compliance with the hourly emission limitation may be determined using emission factor calculations for the carbon monoxide emissions from the combustion and baghouse stacks. The emissions from the combustion stack may be determined by multiplying an emission factor of 84 lbs of carbon monoxide/scf by the emissions unit's maximum hourly fuel consumption rate

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(0.023mmscf/hr). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 (7/98). The emissions from the baghouse stack may be determined by multiplying an emission factor of 0.51 lb of carbon monoxide/ton of material processed by the emissions unit's maximum process weight rate (7.5 tons/hr). This emission factor was derived from emission tests conducted on a similar emissions unit at another facility owned and operated by the permittee.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and 10. The emission tests shall be conducted simultaneously at the combustion stack and baghouse stack outlets while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.

If this emissions unit and emissions unit P912 are both in operation during the emission tests and the total measured carbon monoxide emissions from the combustion stacks serving each emissions unit and the baghouse stack are less than the summation of the hourly carbon monoxide emission limitations for emissions units P912 and P913, compliance with the hourly emission limitations will be demonstrated.

The annual emission limitation was established by multiplying the hourly emission limitation (5.75 lbs/hr) by the annual operating hours (8,760 hrs/year), and dividing by 2,000 (lbs/ton). Compliance with the annual emission limitation is ensured while compliance is maintained with the hourly emission limitation.

1.f Emission Limitations:

Volatile organic compound emissions from this emissions unit shall not exceed 5.77 lbs/hr and 25.3 tons/year.

Applicable Compliance Method:

Compliance with these emission limitations is based upon a summation of the volatile organic compound emissions from the combustion stack serving this emissions unit and the volatile organic compound emissions from the baghouse stack serving this emissions unit.

Compliance with the hourly emission limitation may be determined using emission factor calculations for the volatile organic compound emissions from the combustion and baghouse stacks. The emissions from the combustion stack may be determined by multiplying an emission factor of 5.5 lbs of volatile organic compounds/mmscf by the emissions unit's maximum hourly fuel consumption rate (0.023mmscf/hr). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98). The emissions from the baghouse stack may be determined by multiplying an emission factor of 0.75 lb of volatile organic compounds/ton of material processed by the emissions unit's maximum process weight rate (7.5 tons/hr). This emission factor was derived from emission tests conducted on a similar emissions unit at another facility owned and operated by the permittee.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A, as appropriate. The emission tests shall be conducted simultaneously at the combustion stack and baghouse stack outlets while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.

If this emissions unit and emissions unit P912 are both in operation during the emission tests and the total measured volatile organic compound emissions from the combustion stacks serving each emissions unit and the baghouse stack are less than the summation of the hourly volatile organic compound emission limitations for emissions units P912 and P913, compliance with the hourly emission limitations will be demonstrated.

The annual emission limitation was established by multiplying the hourly emission limitation (5.77 lbs/hr) by the annual operating hours (8,760 hrs/year), and dividing by 2,000 (lbs/ton). Compliance with the annual emission limitation is ensured while compliance is maintained with the hourly emission limitation.

1.g Emission Limitations:

Sulfur dioxide emissions from this emissions unit shall not exceed 1.06 lbs/hr and 4.6 tons/year.

Applicable Compliance Method:

Compliance with these emission limitations is based upon a summation of the sulfur dioxide emissions from the combustion stack serving this emissions unit and the sulfur dioxide emissions from the baghouse stack serving this emissions unit.

Compliance with the hourly emission limitation may be determined using emission factor calculations for the sulfur dioxide emissions from the combustion and baghouse stacks. The emissions from the combustion stack may be determined by multiplying an emission factor of 0.006 lb of sulfur dioxide/ton of material processed by the emissions unit's maximum process weight rate (7.5 tons/hr). This emission factor was derived from emission tests conducted on a similar emissions unit at another facility owned and operated by the permittee. The emissions from the baghouse stack may be determined by multiplying an emission factor of 0.135 lb of sulfur dioxide/ton of material processed by the emissions unit's maximum process weight rate (7.5 tons/hr). This emission factor was derived from emission tests conducted on a similar emissions unit at another facility owned and operated by the permittee.

If required, the permittee shall demonstrate compliance with this emission limitation through

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emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and 6. The emission tests shall be conducted simultaneously at the combustion stack and baghouse stack outlets while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.

If this emissions unit and emissions unit P912 are both in operation during the emission tests and the total measured sulfur dioxide emissions from the combustion stacks serving each emissions unit and the baghouse stack are less than the summation of the hourly sulfur dioxide emission limitations for emissions units P912 and P913, compliance with the hourly emission limitations will be demonstrated.

The annual emission limitation was established by multiplying the hourly emission limitation (1.06 lbs/hr) by the annual operating hours (8,760 hrs/year), and dividing by 2,000 (lbs/ton). Compliance with the annual emission limitation is ensured while compliance is maintained with the hourly emission limitation.

1.h Emission Limitations:

Lead emissions from this emissions unit shall not exceed 0.04 lb/hr and 0.18 ton/year.

Applicable Compliance Method:

Compliance with these emission limitations is based upon a summation of the lead emissions from the combustion stack serving this emissions unit and the lead emissions from the baghouse stack serving this emissions unit.

Compliance with the hourly emission limitation may be determined using emission factor calculations for the lead emissions from the combustion and baghouse stacks. The emissions from the combustion stack may be determined by multiplying an emission factor of 0.0036 lb of lead/ton of material processed by the emissions unit's maximum process weight rate (7.5 tons/hr). This emission factor was derived from emission tests conducted on a similar emissions unit at another facility owned and operated by the permittee. The emissions from the baghouse stack may be determined by multiplying an emission factor of 0.00174 lb of lead/ ton of material processed by the emissions unit's maximum process weight rate (7.5 tons/hr). This emission factor was derived from emission tests conducted on a similar emissions unit at another facility owned and operated by the permittee.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and 12. The emission tests shall be conducted simultaneously at the combustion stack and baghouse stack outlets while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.

If this emissions unit and emissions unit P912 are both in operation during the emission tests and the total measured lead emissions from the combustion stacks serving each emissions unit and the baghouse stack are less than the summation of the hourly lead emission limitations for emissions

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units P912 and P913, compliance with the hourly emission limitations will be demonstrated.

The annual emission limitation was established by multiplying the hourly emission limitation (0.04 lb/hr) by the annual operating hours (8,760 hrs/year), and dividing by 2,000 (lbs/ton). Compliance with the annual emission limitation is ensured while compliance is maintained with the hourly emission limitation.

1.i Emission Limitation:

Fugitive dust emissions from this emissions unit shall not exceed 0.16 lb/hr and 0.71 tons/year.

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the emission factor of 4.3 lbs/ton of metal (FIRE v. 6.23, SCC 3-04-001-03) by the maximum process weight rate (7.5 tons/hr) and by one minus the estimated capture rate of 99.5% (1-0.995).

The annual emission limitation was established by multiplying the hourly emission limitation of 0.16 lb/hr by the annual operating hours (8,760 hrs/year) and dividing by 2,000 (lbs/ton). Compliance with the annual emission limitation is ensured while compliance is maintained with the hourly emission limitation.

1.k . Emission Limitation

Fugitive PM10 emissions from this emissions unit shall not exceed 0.10 lb/hr and 0.43 ton/year.

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the emission factor of 2.6 lbs/ton of metal (FIRE v. 6.23, SCC 3-04-001-03) by the maximum process weight rate (7.5 tons/hr) and by one minus the assumed capture rate of 99.5% (1-0.995).

The annual emission limitation was established by multiplying the hourly emission limitation of 0.10 lb/hr by the annual operating hours (8,760 hrs/year) and dividing by 2,000 (lbs/ton). Compliance with the annual emission limitation is ensured while compliance is maintained with the hourly emission limitation.

2. Performance testing shall be performed in accordance with the following requirements of 40 CFR 63, Subpart RRR: 63.1511 (a) - (e), (g) and (h); 63.1512 (d)(1)(3), (j)(2), (k), and (n) - (s); and 63.1513 (b), (d) and (e).

Note: Part 63.1513 (c) may also be used to determine compliance for HCl limits.

## VI. Miscellaneous Requirements

None

Waba:

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**B. State Only Enforceable Section**

**I. Applicable Emission 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 emission 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.

<b>Operations, Property, and/or Equipment</b>	<b>Applicable Rules/Requirements</b>	<b>Applicable Emission Limitations/Control measures</b>
(P913) 110-ton (aluminum holding capacity), reverberatory furnace (Furnace No. 4) equipped with an enclosed hood with doors. (The hood captures emissions generated by charging, melting, fluxing, skimming, and chlorine gas demagging operations. A blower draws these captured emissions from the top of the hood and discharges them into a baghouse shared by Furnaces Nos. 2 and 4. Furnace No. 4 has two natural gas-fired burners with a maximum total heat input capacity of 24 mmBtu/hr. This emissions unit is a Group 1 Furnace with a sidewall and is part of a SAPU.) (Modification)	None	None

**2. Additional Terms and Conditions**

Waba:

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None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. This unit became subject to 40 CFR 63, Subpart RRR on March 23, 2004 which regulates the hazardous air pollutants hydrogen chloride and dioxin and furan, and emissions of particulate matter that serve as a measure of total particulate emissions and as a surrogate for metal HAPs contained in the particulates, including but not limited to, antimony, arsenic, beryllium, cadmium, chromium, cobalt, lead, manganese, mercury, nickel and selenium.
2. For pollutants, other than those which are subject to 40 CFR 63, Subpart RRR, which may be identified by the permittee of Ohio EPA to be covered under the Ohio EPS's "Review of New Sources of Air Toxics Emissions" policy ("Air Toxics Policy"), physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - 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.).

If the permittee determines that the "Air Toxics Policy" will be satisfied for the above changes, the

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Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxics Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxics Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxics Policy" for the change.

#### **IV. Reporting Requirements**

None

#### **V. Testing Requirements**

None