



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
CUYAHOGA COUNTY  
Application No: 13-03671**

**CERTIFIED MAIL**

**DATE:** 7/6/00

Re-melt Services Inc  
Drew Heideloff  
1918 E 55th St  
Cleveland, OH 44103

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA  
PA

CBAPC



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

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

**DRAFT PERMIT TO INSTALL 13-03671**

Application Number: 13-03671  
APS Premise Number: 1318008545  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Re-melt Services Inc  
Person to Contact: Drew Heideloff  
Address: 1918 E 55th St  
Cleveland, OH 44103

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

**6510 Juniata Ave  
Cleveland, Ohio**

Description of proposed emissions unit(s):

**This PTI is for the installation of two(2) reveratory aluminum melting furnaces used in the processing of cast aluminum car wheels.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

**Part I - GENERAL TERMS AND CONDITIONS**

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

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

**2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

**3. Records Retention Requirements**

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

**4. Inspections and Information Requests**

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

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

**Re-melt Services Inc**

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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

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facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed 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 prove to be inadequate or cannot meet applicable standards.

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

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

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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**14. Construction Compliance Certification**

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

**15. Fees**

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

**B. Permit to Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	14.68
PM10	13.98
SO <sub>2</sub>	0.066
NO <sub>x</sub>	9.86
VOC	0.464
CO	0.262
HCl	0.095
HF	0.041
Dioxin/Furan	6.08 x10 <sup>-6</sup> TEQ

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Cleaning operation</u>	<u>Applicable Rules/Requirements</u>
P901 - Aluminum melting process consisting of a 3000 lbs/hr capacity reverbatory furnace, and a holding well for molten metal.		OAC rule 3745-31-05(A)(3)

Emissions Unit ID: P901

Applicable Emissions  
Limitations/Control Measures

40 CFR Part 63, Subpart-RRR  
National Emission Stds. for  
Secondary Aluminum Processing  
Facilities

7.34 tpy PE  
1.68 lbs/hr PE

6.99 tpy PM10  
1.60 lbs/hr PM10

0.033 tpy SO<sub>2</sub>  
0.0075 lbs/hr SO<sub>2</sub>

4.93 tpy NO<sub>x</sub>  
1.13 lbs/hr NO<sub>x</sub>

0.232 tpy VOC  
0.053 lbs/hr VOC

0.131 tpy CO  
0.030 lbs/hr CO

0.048 tpy HCl  
1.82 lbs/hr HCl

0.021 tpy HF  
0.79 lbs/hr HF

OAC rule 3745-17-07(A)

OAC rule 3745-17-07(B)(1)

OAC rule 3745-17-08(B)

OAC rule 3745-17-11(A)(2)

Visible emissions from the stack servicing this emissions unit shall not exceed 10% opacity, as a 6-minute average.

Visible fugitive dust emissions shall not exceed 10% opacity, as a 3-minute average.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-08(B), and 40CFR Part 63

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Emissions Unit ID: **P901**

Subpart RRR.

The permittee shall not be allowed to discharge to the atmosphere any 3-day

24-hour rolling average emissions of Dioxin/Furans in excess of  $2.1 \times 10^{-4}$  grams TEQ per ton feed charge to the furnace. (See Section A.2.a.)

(See B.1, B.2, B.3, and B.4)

$3.04 \times 10^{-6}$  TEQ tpy on ton feed charge basis

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

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

This emission unit must employ RACM.

See Section A.2.c.

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

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

**2.a** Per 40 CFR, Part 63.1503 a three-day, 24-hour rolling average means daily calculations of

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Emissions Unit ID: **P901**

**Issued: To be entered upon final issuance**

the average 24-hour emission rate (lbs/ton of feed/ charge), over the 3 most recent consecutive 24-hour periods for this type of facility.

- 2.b** The performance of reactive fluxing or use of reactive fluxing agents is not allowed while the emissions unit is in operation.
- 2.c** The permittee shall minimize or eliminate visible particulate emissions through employment of reasonably available control measures (RACM) in order to prevent the fugitive dust from becoming airborne.

**B. Operational Restrictions**

1. The permittee shall prepare and submit before the Cleveland Bureau of Air Pollution Control (CBAPC) a written operation, maintenance, and monitoring (OM&M) plan for the aluminum melting operation as describe in 40CFR, 63.1510(b). The deadline for the plan will be upon completion of the initial compliance demonstration test.
2. The permittee shall operate the reverbatory furnace within the range of charge materials, contaminant levels, and parameter values established in the manufacturer's process design specifications and according to the work practice/pollution prevention measures documented in the OM&M plan.
3. The permittee must provide and maintain easily visible labels posted at the furnace which identifies applicable emission limits and means of compliance, including: applicable operational standard(s) and control method(s), type of charge to be used, applicable operating parameter ranges and requirements as incorporated in the OM&M plan.
4. The permittee must install a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test, and operate the weight measurement system in accordance with the procedures outline in the OM&M plan.
5. The permittee is allowed to use only nearly clean charge as the source of raw material.
6. The maximum weekly furnace cleaning operating hours for this emissions unit shall not exceed one hour or it's equivalent of 26 hours per year.

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

Emissions Unit ID: **P901**

1. The permittee shall monitor the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test, and operate the weight measurement system in accordance with the procedures outline in the OM&M plan.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any abnormal visible particulate emissions from the stack serving this emissions unit. The presence or absence of any abnormal visible emissions shall be noted in an operations log. If abnormal visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any abnormal visible emission incident; and
  - e. any corrective actions taken to eliminate the abnormal visible emissions.
3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any abnormal visible fugitive particulate emissions from the building containing this emissions unit. The presence or absence of abnormal any visible emissions shall be noted in an operations log. If abnormal visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any abnormal visible emission incident; and
  - e. any corrective actions taken to eliminate the abnormal visible emissions.
4. The permittee shall maintain a weekly as well as an annual record of the cleaning operating hours for this emissions unit.

#### **D. Reporting Requirements**

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



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Emissions Unit ID: **P901**

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Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10), if required.

c. Emission Limitation:

6.99 tpy PM10  
1.60 lb/hr PM10

This limit is based on the allowable hourly emission limit (1.60 lbs/hr) multiplied by the maximum possible operating hours (8,760 hr/yr), and divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Compliance with the PM10 emission limits shall be based on calculations using the appropriate AP-42 emission factor (1.07 lb/ton) multiplied by the operating process weight rate (ton/hr), or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 201, if required.

d. Emission Limitation:

0.033 tpy SO<sub>2</sub>  
0.0075 lb/hr SO<sub>2</sub>

Applicable Compliance Method:

This limit is based on the allowable hourly emission limit (0.0075 lbs/hr) multiplied by the maximum possible operating hours (8,760 hr/yr), and divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Compliance with the SO<sub>2</sub> emission limits shall be based on calculations using the appropriate emission factor (0.001 lb/10<sup>6</sup> BTU) multiplied by the total heat input to the process (BTU/hr), or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 6, if required.

e. Emission Limitation:

4.93 tpy NO<sub>x</sub>  
1.13 lbs/hr NO<sub>x</sub>

Applicable Compliance Method:

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This limit is based on the allowable hourly emission limit (1.13 lbs/hr) multiplied by the maximum possible operating hours (8,760 hr/yr), and divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Compliance with the NO<sub>x</sub> emission limits shall be based on calculations using the appropriate emission factor (0.150 lb/10<sup>6</sup> BTU) multiplied by the total heat input to the process (BTU/hr), or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 7, if required.

f. Emission Limitation:

0.232 tpy VOC emissions  
0.053 lb/hr VOC

Applicable Compliance Method:

This limit is based on the allowable hourly emission limit (0.053 lbs/hr) multiplied by the maximum possible operating hours (8,760 hr/yr), and divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Compliance with the VOC emission limits shall be based on calculations using the appropriate emission factor (0.007 lb/10<sup>6</sup> BTU) multiplied by the total heat input to the process (BTU/hr), or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 25, if required.

g. Emission Limitation:

0.131 tpy CO emissions  
0.030 lbs/hr CO

Applicable Compliance Method:

This limit is based on the allowable hourly emission limit (0.030 lbs/hr) multiplied by the maximum possible operating hours (8,760 hr/yr), and divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emissions Unit ID: **P901**

Compliance with the CO emission limits shall be based on calculations using the appropriate emission factor (0.004 lb/10<sup>6</sup> BTU) multiplied by the total heat input to the process (BTU/hr), or in accordance with 40 CFR Part 60, Appendix A, Method 10, if required.

h. Emission Limitation

0.048 tpy HCl emissions  
1.82 lbs/hr HCl

Applicable Compliance Method:

This limit is based on the allowable hourly emission limit (1.82 lbs/hr) multiplied by the maximum possible furnace operating cleaning hours (26 hr/yr) as stated in Section C.4., and divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Compliance with the HCl emission limits shall be based on recordkeeping of the cleaning material (A.M.C.C., A-128) usage of 4.81 lb/week on a 52 week per year basis, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 26, if required.

i. Emission Limitation

0.021 tpy HF emissions  
0.79 lbs/hr HF

Applicable Compliance Method:

This limit is based on the allowable hourly emission limit (0.79 lbs/hr) multiplied by the maximum possible furnace operating cleaning hours (26 hr/yr) as stated in Section C.4., and divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

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Emissions Unit ID: **P901**

Compliance with the HF emission limits shall be based on recordkeeping of the cleaning material (A.M.C.C., A-128) usage of 4.81 lb/week on a 52 week per year basis, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 26, if required.

j. Emission Limitation:

Visible dust emissions from stack  
10 % opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A , Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

k. Emission Limitation:

Fugitive dust emissions  
10 % opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined in accordance with USEPA Method 22, 40 CFR part 60.

## **F. Miscellaneous Requirements**

1. NONE

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Emissions Unit ID: **P902**

Issued: To be entered upon final issuance

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P902 - Aluminum melting process consisting of a 3000 lbs/hr capacity reveratory furnace, and a holding well for molten metal.	OAC rule 3745-31-05(A)(3)

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Emissions Unit ID: P902

		<u>Applicable Emissions Limitations/Control Measures</u>
		7.34 tpy PE 1.68 lbs/hr PE  6.99 tpy PM10 1.60 lbs/hr PM10  0.033 tpy SO <sub>2</sub> 0.0075 lbs/hr SO <sub>2</sub>
40 CFR Part 63, Subpart-RRR National Emission Stds. for Secondary Aluminum Processing Facilities		4.93 tpy NO <sub>x</sub> 1.13 lbs/hr NO <sub>x</sub>  0.232 tpy VOC 0.053 lbs/hr VOC  0.131 tpy CO 0.030 lbs/hr CO
OAC rule 3745-17-07(A)		0.048 tpy HCl 1.82 lbs/hr HCl  0.021 tpy HF 0.79 lbs/hr HF
OAC rule 3745-17-07(B)(1)		Visible emissions from the stack servicing this emissions unit shall not exceed 10% opacity, as a 6-minute average.
OAC rule 3745-17-08(B)		Visible fugitive dust emissions shall not exceed 10% opacity, as a 3-minute average.
OAC rule 3745-17-11(A)(2)		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-08(B), and 40CFR Part 63

Subpart RRR.

The permittee shall not be allowed to discharge to the atmosphere any 3-day 24-hour rolling average emissions of Dioxin/Furans in excess of  $2.1 \times 10^{-4}$  grams TEQ per ton feed charge to the furnace. (See Section A.2.a.)  
(See B.1, B.2, B.3, and B.4)

$3.04 \times 10^{-6}$  TEQ tpy on ton feed charge basis

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

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

This emission unit must employ RACM.  
See Section A.2.c.

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

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

- 2.a** Per 40 CFR, Part 63.1503 a three-day, 24-hour rolling average means daily calculations of the average 24-hour emission rate (lbs/ton of feed/ charge), over the 3 most recent consecutive 24-hour periods for this type of facility.

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Emissions Unit ID: **P902**

**Issued: To be entered upon final issuance**

- 2.b The performance of reactive fluxing or use of reactive fluxing agents is not allowed while the emissions unit is in operation.
- 2.c The permittee shall minimize or eliminate visible particulate emissions through employment of reasonably available control measures (RACM) in order to prevent the fugitive dust from becoming airborne.

## **B. Operational Restrictions**

1. The permittee shall prepare and submit before the Cleveland Bureau of Air Pollution Control (CBAPC) a written operation, maintenance, and monitoring (OM&M) plan for the aluminum melting operation as describe in 40CFR, 63.1510(b). The deadline for the plan will be upon completion of the initial compliance demonstration test.
2. The permittee shall operate the reveratory furnace within the range of charge materials, contaminant levels, and parameter values established in the manufacturer's process design specifications and according to the work practice/pollution prevention measures documented in the OM&M plan.
3. The permittee must provide and maintain easily visible labels posted at the furnace which identifies applicable emission limits and means of compliance, including: applicable operational standard(s) and control method(s), type of charge to be used, applicable operating parameter ranges and requirements as incorporated in the OM&M plan.
4. The permittee must install a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test, and operate the weight measurement system in accordance with the procedures outline in the OM&M plan.
5. The permittee is allowed to use only nearly clean charge as the source of raw material.
- 6.5. The maximum weekly furnace cleaning operating hours for this emissions unit shall not exceed one hour or it's equivalent of 26 hours per year.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall monitor the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test, and operate the weight measurement system in accordance with the procedures outline in the OM&M plan.

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Emissions Unit ID: **P902**

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2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any abnormal visible particulate emissions from the stack serving this emissions unit. The presence or absence of any abnormal visible emissions shall be noted in an operations log. If abnormal visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any abnormal visible emission incident; and
  - e. any corrective actions taken to eliminate the abnormal visible emissions.
3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any abnormal visible fugitive particulate emissions from the building containing this emissions unit. The presence or absence of abnormal any visible emissions shall be noted in an operations log. If abnormal visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any abnormal visible emission incident; and
  - e. any corrective actions taken to eliminate the abnormal visible emissions.
4. The permittee shall maintain a weekly as well as an annual record of the cleaning operating hours for this emissions unit.

#### **D. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Cleveland Bureau of Air Pollution Control by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible fugitive particulate emissions were observed escaping from the building containing this

Emissions Unit ID: **P902**

emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible fugitive particulate emissions. These reports shall be submitted to the Cleveland Bureau of Air Pollution Control by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. The permittee shall submit annual written reports which identify any exceedances of the weekly cleaning operating hours limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

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Emissions Unit ID: **P902**

**E. Testing Requirements**

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

a. Emission Limitation:

15.0 $\mu$ g TEQ Dioxin/Furans/Mg ( $2.1 \times 10^{-4}$  g TEQ Dioxin/Furan/ton)  
per feed charge to the furnace on a 3-day, 24-hour rolling average.

Applicable Compliance Method:

Compliance with this limitation shall be demonstrated in accordance with emission testing using 40 CFR Part 60, Appendix A, Method 23.

b. Emission Limitation:

7.34 tpy PE  
1.68 lbs/hr PE

Applicable Compliance Method:

This limit is based on the allowable hourly emission limit (1.68 lbs/hr) multiplied by the maximum possible operating hours (8,760 hr/yr), and divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Compliance with the PE emission limits shall be based on calculations using the appropriate AP-42 emission factor (1.10 lb/ton) multiplied by the operating process weight rate (ton/hr), or otherwise in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10), if required.

c. Emission Limitation:

6.99 tpy PM10  
1.60 lb/hr PM10

This limit is based on the allowable hourly emission limit (1.60 lbs/hr) multiplied by the maximum possible operating hours (8,760 hr/yr), and divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also

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be shown with the annual limitation.

Emissions Unit ID: **P902**

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Compliance with the PM10 emission limits shall be based on calculations using the appropriate AP-42 emission factor (1.07 lb/ton) multiplied by the operating process weight rate (ton/hr), or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 201, if required.

d. Emission Limitation:

0.033 tpy SO<sub>2</sub>  
0.0075 lb/hr SO<sub>2</sub>

Applicable Compliance Method:

This limit is based on the allowable hourly emission limit (0.0075 lbs/hr) multiplied by the maximum possible operating hours (8,760 hr/yr), and divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Compliance with the SO<sub>2</sub> emission limits shall be based on calculations using the appropriate emission factor (0.001 lb/10<sup>6</sup> BTU) multiplied by the total heat input to the process (BTU/hr), or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 6, if required.

e. Emission Limitation:

4.93 tpy NO<sub>x</sub>  
1.13 lbs/hr NO<sub>x</sub>

Applicable Compliance Method:

This limit is based on the allowable hourly emission limit (1.13 lbs/hr) multiplied by the maximum possible operating hours (8,760 hr/yr), and divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Compliance with the NO<sub>x</sub> emission limits shall be based on calculations using the appropriate emission factor (0.150 lb/10<sup>6</sup> BTU) multiplied by the total heat input to the process (BTU/hr), or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 7, if required.

f. Emission Limitation:

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Emissions Unit ID: **P902**

**Issued: To be entered upon final issuance**

0.232 tpy VOC emissions

0.053 lb/hr VOC

Applicable Compliance Method:

This limit is based on the allowable hourly emission limit (0.053 lbs/hr) multiplied by the maximum possible operating hours (8,760 hr/yr), and divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Compliance with the VOC emission limits shall be based on calculations using the appropriate emission factor (0.007 lb/10<sup>6</sup> BTU) multiplied by the total heat input to the process (BTU/hr), or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 25, if required.

g. Emission Limitation:

0.131 tpy CO emissions

0.030 lbs/hr CO

Applicable Compliance Method:

This limit is based on the allowable hourly emission limit (0.030 lbs/hr) multiplied by the maximum possible operating hours (8,760 hr/yr), and divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Compliance with the CO emission limits shall be based on calculations using the appropriate emission factor (0.004 lb/10<sup>6</sup> BTU) multiplied by the total heat input to the process (BTU/hr), or in accordance with 40 CFR Part 60, Appendix A, Method 10, if required.

h. Emission Limitation

0.048 tpy HCl emissions

1.82 lbs/hr HCl

Applicable Compliance Method:

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Emissions Unit ID: **P902**

**Issued: To be entered upon final issuance**

This limit is based on the allowable hourly emission limit (1.82 lbs/hr) multiplied by the maximum possible furnace operating cleaning hours (26 hr/yr) as stated in Section C.4., and divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Compliance with the HCl emission limits shall be based on recordkeeping of the cleaning material (A.M.C.C., A-128) usage of 4.81 lb/week on a 52 week per year basis, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 26, if required.

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Emissions Unit ID: **P902**

**Issued: To be entered upon final issuance**

i. Emission Limitation

0.021 tpy HF emissions  
0.79 lbs/hr HF

Applicable Compliance Method:

This limit is based on the allowable hourly emission limit (0.79 lbs/hr) multiplied by the maximum possible furnace operating cleaning hours (26 hr/yr) as stated in Section C.4., and divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Compliance with the HF emission limits shall be based on recordkeeping of the cleaning material (A.M.C.C., A-128) usage of 4.81 lb/week on a 52 week per year basis, or otherwise in accordance with 40 CFR Part 60, Appendix A, Method 26, if required.

j. Emission Limitation:

Visible dust emissions from stack  
10 % opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A , Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

k. Emission Limitation:

Fugitive dust emissions  
10 % opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined in accordance with USEPA Method 22, 40 CFR part 60.

**F. Miscellaneous Requirements**

1. NONE

**NEW SOURCE REVIEW FORM B**

PTI Number: 13-03671

Facility ID: 1318008545

FACILITY NAME Re-melt Services, Inc.

FACILITY DESCRIPTION This PTI is for the installation of two(2) CITY/TWP Cleveland

Emissions Unit ID: **P902**SIC CODE 3341 SCC CODE 3-03-013-01 EMISSIONS UNIT ID P901EMISSIONS UNIT DESCRIPTION Aluminum melting process consisting of a 3000 lb/hr capacity reverbratory furnace, and a holding well for molten metal.DATE INSTALLED July 2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

<u>Pollutants</u>	<u>Air Quality Description</u>	<u>Actual Emissions Rate</u>		<u>PTI Allowable</u>	
		<u>Short Term Rate</u>	<u>Tons Per Year</u>	<u>Short Term Rate</u>	<u>Tons Per Year</u>
Particulate Matter	<u>Non Attainment</u>	<u>1.68</u>	<u>4.73</u>	<u>1.68</u>	<u>7.34</u>
PM <sub>10</sub>	<u>Non Attainment</u>	<u>1.60</u>	<u>4.51</u>	<u>1.60</u>	<u>6.99</u>
Sulfur Dioxide	<u>Non Attainment</u>	<u>0.0075</u>	<u>0.024</u>	<u>0.0075</u>	<u>0.033</u>
Organic Compounds	<u>Attainment</u>	<u>0.053</u>	<u>0.164</u>	<u>0.053</u>	<u>0.232</u>
Nitrogen Oxides	<u>Attainment</u>	<u>1.13</u>	<u>3.51</u>	<u>1.13</u>	<u>4.93</u>
Carbon Monoxide	<u>Attainment</u>	<u>0.030</u>	<u>0.094</u>	<u>0.030</u>	<u>0.131</u>
Lead	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
Other:					
Dioxin/furans	<u>Attainment</u>	<u>6.24 x10<sup>-7</sup> TEQ</u>	<u>1.95 x10<sup>-6</sup> TEQ</u>	<u>6.94 x10<sup>-7</sup> TEQ</u>	<u>3.04 x10<sup>-6</sup> TEQ</u>
HF	<u>Attainment</u>	<u>0.48</u>	<u>0.013</u>	<u>0.79</u>	<u>0.02</u>
HCl	<u>Attainment</u>	<u>1.10</u>	<u>0.029</u>	<u>1.82</u>	<u>0.048</u>

**APPLICABLE FEDERAL RULES:**NSPS?NESHAP: 40 CFR, Part PSD?OFFSET POLICY?63, Sec RRR**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?****Enter Determination:** Engineering analysis and compliance with the regulations covering the source.IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NOOPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A**TOXIC AIR CONTAMINANTS**Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.AIR TOXICS MODELING PERFORMED\*? YES X NO

**NEW SOURCE REVIEW FORM B**

PTI Number: 13-03671

Facility ID: 1318008545

FACILITY NAME Re-melt Services, Inc.

FACILITY DESCRIPTION This PTI is for the installation of two(2) CITY/TWP Cleveland

Emissions Unit ID: **P902**

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P902**

FACILITY DESCRIPTION This PTI is for the installation of two(2) reveratory aluminum melting furnaces used in the processing of cast aluminum car wheels.

CITY/TWP Cleveland

SIC CODE 3341 SCC CODE 3-03-013-01 EMISSIONS UNIT ID P902

EMISSIONS UNIT DESCRIPTION Aluminum melting process consisting of a reveratory furnace, and a holding well for molten metal.

DATE INSTALLED July 2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Non Attainment	1.68	4.73	1.68	7.34
PM <sub>10</sub>	Non Attainment	1.60	4.51	1.60	6.99
Sulfur Dioxide	Non Attainment	0.0075	0.024	0.0075	0.033
Organic Compounds	Attainment	0.053	0.164	0.053	0.232
Nitrogen Oxides	Attainment	1.13	3.51	1.13	4.93
Carbon Monoxide	Attainment	0.030	0.094	0.030	0.131
Lead	N/A	N/A	N/A	N/A	N/A
Other:					
Dioxin/furans	Attainment	6.24 x10 <sup>-7</sup> TEQ	1.95 x10 <sup>-6</sup> TEQ	6.94 x10 <sup>-7</sup> TEQ	3.04 x10 <sup>-6</sup> TEQ
HF	Attainment	0.48	0.013	0.79	0.02
HCl	Attainment	1.10	0.029	1.82	0.048

APPLICABLE FEDERAL RULES:

NSPS? NESHAP:40 CFR, Part PSD?

63, Sec RRR

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination: Engineering analysis and compliance with the regulations covering the source.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES X NO

**34 NEW SOURCE REVIEW FORM B**

PTI Number: 13-03671

Facility ID: 1318008545

FACILITY NAME Re-melt Services, Inc.

FACILITY DESCRIPTION This PTI is for the installation of two(2) CITY/TWP Cleveland

Emissions Unit ID: **P902**

IDENTIFY THE AIR CONTAMINANTS:

35 **NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P902** \_\_\_\_\_

FACILITY DESCRIPTION This PTI is for the installation of two(2) reveratory aluminum melting furnaces used in the processing of cast aluminum car wheels.

CITY/TWP Cleveland

**Ohio EPA Permit to Install Information Form** Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and **electronic files to [airpti@epa.state.oh.us](mailto:airpti@epa.state.oh.us)**

*Please fill out the following. If the checkbox does not work, replace it with an 'X'*

	Electronic	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	Hard Copy	None
Calculations (required)	<input checked="" type="checkbox"/>	1303671c.wpd	<input type="checkbox"/>	
Modeling form/results	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input type="checkbox"/>
PTI Application (complete or partial)*	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
BAT Study	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input type="checkbox"/>
Other/misc.	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input type="checkbox"/>

\* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

[NSR Discussion](#)

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or  Netting Determination

Permit To Install ENTER PTI NUMBER HERE: 1303671

- A. Source Description
- B. Facility Emissions and Attainment Status
- C. Source Emissions
- D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

36 **NEW SOURCE REVIEW FORM B**

PTI Number: 13-03671

Facility ID: 1318008545

FACILITY NAME Re-melt Services, Inc.

FACILITY DESCRIPTION This PTI is for the installation of two(2) CITY/TWP Cleveland

Emissions Unit ID: **P902**

Please complete:

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	14.68
PM10	13.98
SO <sub>2</sub>	0.066
NO <sub>x</sub>	9.86
VOC	0.464
CO	0.262
HCl	0.095
HF	0.041
Dioxin/Furan	6.08 x10 <sup>-6</sup> TEQ