



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
CUYAHOGA COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

Application No: 13-04711

Fac ID: 1318170314

DATE: 3/29/2007

Aluminum Company of America
James Apicella
1600 Harvard Ave
Cleveland, OH 441053040

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1000** will be due. Please do not submit any payment now.

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

Sincerely,

Michael W. Ahern

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

CC: USEPA

CLAA

PA



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 13-04711

Application Number: 13-04711
Facility ID: 1318170314
Permit Fee: **To be entered upon final issuance**
Name of Facility: Aluminum Company of America
Person to Contact: James Apicella
Address: 1600 Harvard Ave
Cleveland, OH 441053040

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

**1600 Harvard Ave
Cleveland, Ohio**

Description of proposed emissions unit(s):

Chapter 31 modification request for P104.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

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

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reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, 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. If this permit is for an emissions unit located at a Title V facility, then 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.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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

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permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- 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, 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 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.

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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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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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 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 and the State and by citizens (to the extent allowed by section 304 of the Act) 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

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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.

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 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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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 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of

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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.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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)

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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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

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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>
PE/PM10	28.47
OC	7.30

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P104) - Hydraulic finishing press operation consisting of an 8,000 ton and a 2,500 ton hydraulic forming press for the production of metal forgings (company ID: 8003X Press)

(Terms in this permit supercede those identified in PTI 13-846 issued 2/26/1982)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Particulate emissions (PE)/PM10 emissions shall not exceed: 0.009 gr/dscf; 6.50 lbs/hr based off a maximum air flow of 84,300 scfm; and 28.47 tons/year. Fugitive PE/PM10 emissions shall not exceed 1.42 tons/year. For lubricants that come in contact with a flame, the organic compound (OC) emissions shall not exceed 2.74 tons/year. For lubricants that do not come in contact with a flame, the OC emissions shall not exceed 7.30 tons/year. The requirements of this rule are equivalent to the requirements of OAC rules 3745-17-07(A)(1), 3745-17-07(B)(1), 3745-17-08(B), 3745-21-07(G)(1), and 3745-21-07(G)(2). See A.I.2.a below.
OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

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OAC rule 3745-17-08(B)	Reasonably available control measures (RACM) must be employed sufficiently to minimize or eliminate visible emissions of fugitive dust. See A.I.2.b below.
OAC rule 3745-21-07(G)(1)	For lubricants that come in contact with a flame, the OC emissions shall not exceed 3 lbs/hr and 15 lbs/day or the permittee shall achieve an overall reduction of 85% by weight of OC emissions generated by this emissions unit. See A.I.2.c below.
OAC rule 3745-21-07(G)(2)	For lubricants that do not come in contact with a flame, the OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. See A.I.2.d below.

2. Additional Terms and Conditions

- 2.a** For purposes of satisfying the "Best Available Technology" requirements under OAC rule 3745-31-05(A)(3), the permittee shall employ "emissions reducing lubricants" in this emissions unit. "Emissions reducing lubricants" shall be defined as producing particulate emissions less than 0.009 gr/dscf and achieving an overall reduction of 85% by weight of OC emissions generated by this emissions unit.
- 2.b** The permittee shall employ RACM that include, but are not limited to, the use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control particulate emissions from this emissions unit. The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.
- 2.c** The Ohio EPA has determined that OAC rule 3745-21-07(G)(1) is an applicable requirement for this emissions unit for each liquid organic lubricant, which is not exempt from the emission limitations of OAC rule 3745-21-07(G), that is employed and comes into contact with a flame. Certain lubricants employed in this emissions unit always have flame present when applying the lubricant; therefore, OAC rule 3745-21-07(G)(1) is an applicable requirement when these lubricants are employed. In addition, these OC emissions are not exempt from OAC rule 3745-21-07(G) pursuant to OAC rule 3745-21-07(G)(9)(e) because the parts are at a temperature exceeding 220 degrees Fahrenheit (typically a minimum of 600 degrees Fahrenheit).
- 2.d** For the lubricants that do not come into contact with a flame, this emissions unit is subject to the emission limitations specified in OAC rule 3745-21-07(G)(2) during each day when a photochemically reactive material (as defined in OAC

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rule 3745-21-01(C)(5)), or substance containing such photochemically reactive material is employed.

- 2.e** As specified in OAC rule 3745-21-07(G)(9)(c), lubricants meeting all of the following criteria are exempt from the emission limitations of OAC rule 3745-21-07(G):
- i. the volatile content of the lubricant consists only of water and liquid organic material;
 - ii. the liquid organic material comprises not more than twenty per cent of said volatile content; and
 - iii. the volatile content is not a photochemically reactive material.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record the following information for each day when this emissions unit is in operation:
 - a. the company identification of each lubricant employed;
 - b. for each lubricant employed, documentation as to whether or not:
 - i. the lubricant is a liquid organic material as defined in OAC rule 3745-21-01(C)(3);
 - ii. the lubricant is exempt from the emission limitations of OAC rule 3745-21-07(G) as specified in A.I.2.d; and
 - iii. the lubricant comes in contact with a flame.
 - c. the amount of each lubricant employed, in pounds;
 - d. the PE factor for each lubricant employed, in pounds of PE per pound of lubricant;
 - e. the PM10 factor for each lubricant employed, in pounds of PM10 per pound of lubricant;
 - f. the total PE rate for all lubricants employed, in pounds of PE per day, calculated as the sum of (c) x (d) for all lubricants employed;
 - g. the total PE rate for all lubricants employed, in pounds of PE per day, calculated as the sum of (c) x (e) for all lubricants employed;

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- h. the total number of hours the emissions unit was in operation;
 - i. the average hourly PE emission rate calculated as (f)/(h), in lbs/hr (average); and
 - j. the average hourly PE emission rate calculated as (g)/(h), in lbs/hr (average).
- * The permittee shall conduct emission testing to develop PE and/or PM10 emission factors for any new lubricant employed unless the permittee assumes that all of the PE and/or PM10 in the lubricant is emitted.
2. On each day during which a liquid organic lubricant, which is not exempt from the emission limitations of OAC rule 3745-21-07(G), is employed, the permittee shall record the following information for all the lubricants that come in contact with a flame (i.e., subject to OAC rule 3745-21-07(G)(1) limitations):
- a. the amount of each lubricant (exempt and non-exempt lubricant) employed, in pounds;
 - b. the OC emission factor for each lubricant (exempt and non-exempt lubricant) employed, in pounds OC emissions per pound of lubricant;
 - c. the total OC emission rate for all lubricants employed, in pounds OC emissions per day, calculated as the sum of (a) x (b) for all lubricants employed;
 - d. the total number of hours the emissions unit was in operation; and
 - e. the average hourly OC emission rate calculated as (c)/(d), in lbs/hr (average).

For each day during which the permittee utilizes only lubricants for which the permittee has demonstrated through emission testing that an 85% reduction in OC emissions would be achieved for each lubricant, the above-mentioned record keeping is not required.

- * The permittee shall conduct emission testing to develop OC emission factors for any new lubricant employed unless the permittee assumes that all of the OC in the lubricant is emitted.
3. On each day during which a liquid organic lubricant, which is not exempt from the emission limitations of OAC rule 3745-21-07(G), is employed, the permittee shall record the following information for the lubricants that do not come in contact with a

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flame (i.e., subject to OAC rule 3745-21-07(G)(2) limitations):

- a. the amount of each lubricant (exempt and non-exempt lubricant) employed, in pounds;
 - b. the OC emission factor for each lubricant (exempt and non-exempt lubricant) employed, in pounds OC emissions per pound of lubricant;
 - c. the total OC emission rate for all lubricants employed, in pounds OC emissions per day, calculated as the sum of (a) x (b) for all lubricants employed;
 - d. the total number of hours the emissions unit was in operation; and
 - e. the average hourly OC emission rate calculated as (c)/(d), in lbs/hr (average).
- * The permittee shall conduct emission testing to develop OC emission factors for any new lubricant employed unless the permittee assumes that all of the OC in the lubricant is emitted.
4. The permittee shall maintain copies of all the stack test results used to develop the OC, PE, and PM10 emission factors.
 5. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
 6. The permittee shall perform weekly checks, when the emissions unit is in operation, for any visible emissions of fugitive dust from the building housing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;

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- b. the total duration of any visible emission incident;
 - c. any corrective actions taken to eliminate the visible emissions;
 - d. whether the emissions are representative of normal operations; and
 - e. if the emissions are not representative of normal operations, the cause of the abnormal emissions.
7. The visible emission checks may be performed in person or using the facility's color video surveillance system. When using the video surveillance system, the permittee shall ensure that the video surveillance system is able to clearly view the stack and all the fugitive egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit.

The person(s) conducting the visible emission observations shall be trained annually on completing the visible emission checks and associated record keeping and implementing corrective actions to address a visible emission incident.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (or excursion) reports that identify each day during which the actual average hourly PE and/or PM10 rate exceeded the limit in A.I.1 and the actual average hourly PE and/or PM10 rate for each such day.
2. For all the days when the record keeping in A.III.2 was required, the permittee shall submit quarterly deviation (excursion) reports that identify (a) each day during which a liquid organic lubricant, which is not exempt from the emission limitations of OAC rule 3745-21-07(G), is employed, the lubricant comes in contact with a flame, and the average hourly OC emission rate exceeded 3 pounds per hour and (b) the actual average hourly OC emission rate for each such day.
3. For all the days when the record keeping in A.III.2 was required, the permittee shall submit quarterly deviation (excursion) reports that identify (a) each day during which a liquid organic lubricant, which is not exempt from the emission limitations of OAC rule 3745-21-07(G), is employed, the lubricant comes in contact with a flame, and the OC emission rate exceeded 15 pounds per day and (b) the actual OC emission rate for each such day.
4. The permittee shall submit quarterly deviation (excursion) reports that identify (a) each

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day during which a liquid organic lubricant, which is not exempt from the emission limitations of OAC rule 3745-21-07(G), is employed, the lubricant does not come in contact with a flame, and the average hourly OC emission rate exceeded 8 pounds per hour and (b) the actual average hourly OC emission rate for each such day.

5. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which a liquid organic lubricant, which is not exempt from the emission limitations of OAC rule 3745-21-07(G), is employed, the lubricant does not come in contact with a flame, and the OC emission rate exceeded 40 pounds per day and (b) the actual OC emission rate for each such day.
6. The permittee shall submit the quarterly deviation (excursion) reports in accordance with General Term and Condition A.1.c.ii of this permit. The deviation reports shall include the emission factor(s) used and a copy of the emission calculation(s) which document the deviation(s).
7. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland Division of Air Quality (Cleveland DAQ) by January 31 and July 31 of each year and shall cover the previous 6-month period.
8. The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed from the building housing 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 January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitations:
PE/PM10 emissions shall not exceed 0.009 gr/dscf and 6.50 lbs/hr based off a maximum air flow of 84,300 scfm.

Applicable Compliance Method:
Compliance with the mass emission limitation shall be demonstrated by using Methods 1 through 5, 210 or 201A, as applicable, and 202, as outlined in 40 CFR Part 60, Appendix A.
 - b. Emission Limitations:
PE/PM10 emissions shall not exceed 28.47 tons/year.

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Applicable Compliance Method:

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

c. Emission Limitations:

Fugitive PE/PM10 emissions shall not exceed 1.42 tons/year.

Applicable Compliance Method:

The emission limitation was developed by multiplying the maximum annual PE/PM10 emissions (28.47 tons/year) by one (1) minus the capture efficiency of the hood(s) and fan(s) (95%), (1-0.95), which equals 1.42 tons/year.

d. Emission Limitations:

For the lubricants that come in contact with a flame, the OC emissions shall not exceed 3 lbs/hr; or there shall be an 85% reduction in OC emissions.

For the lubricants that do not come in contact with a flame, the OC emissions shall not exceed 8 lbs/hr.

Applicable Compliance Method:

Compliance shall be determined pursuant to the monitoring and record keeping in section A.III.

If required, compliance shall be demonstrated based on emission testing in accordance with Methods 1 through 4 and 25, 25A, 25B, or alternative modified Test Method 18 of 40 CFR Part 60, Appendix A. Alternative modified Test Method 18 may be used in place of Test Methods 25, 25A or 25B (see A.V.2 below).

e. Emission Limitations:

For the lubricants that come in contact with a flame, the OC emissions shall not exceed 15 lbs/day; or there shall be an 85% reduction in OC emissions.

For the lubricants that do not come in contact with a flame, the OC emissions shall not exceed 40 lbs/day.

Applicable Compliance Method:

Compliance shall be determined pursuant to the monitoring and record keeping in section A.III.

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- f. Emission Limitations:
For lubricants that come in contact with a flame, the OC emissions shall not exceed 2.74 tons/year.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the maximum daily emission rate for lubricants that come into contact with a flame (15 lbs/day) by 365 days per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per day limitation for lubricants that come into contact with a flame.

- g. Emission Limitations:
For lubricants that do not come in contact with a flame, the OC emissions shall not exceed 7.30 tons/year.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the maximum daily emission rate for lubricants that do not come into contact with a flame (40 lbs/day) by 365 days per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per day limitation for lubricants that do not come into contact with a flame.

- h. Emission Limitation:
Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance may be determined through visible PE observations performed in accordance with U.S. EPA Test Method 9 of 40 CFR, Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1).

- i. Emission Limitation:
Visible emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance may be determined through visible emission testing performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3). For purposes of verifying compliance with this limitation, visible emission observations shall be performed at the non-stack egress points (e.g., windows, doors, roof monitors) serving this emissions

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unit.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 3 months after startup of the emissions unit while employing emission reducing lubricants.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable concentration of PE, PM10, and OCs in the exhaust stream
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

for PE, Methods 1 through 5 of 40 CFR Part 60, Appendix A;

for PM10, Methods 1 through 4, 201 or 201A, as applicable, and 202 of 40 CFR Part 60, Appendix A; and

for OCs, Methods 1 through 4 and 25, 25A or 25B, as applicable, of 40 CFR Part 60, Appendix A. (An alternative modified Test Method 18 was approved in a November 19, 1984 letter from the Director of Air Management Division, U.S. EPA Region V to the General Manager Environmental Control, Aluminum Company of America, Pittsburgh, PA 15219. This alternative modified Test Method 18 may be used in place of Test Methods 25, 25A, or 25B.)

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

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland DAQ.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).
- f. Personnel from the Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to

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ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P104) - Hydraulic finishing press operation consisting of an 8,000 ton and a 2,500 ton hydraulic forming press for the production of metal forgings (company ID: 8003X Press)

(Terms in this permit supercede those identified in PTI 13-846 issued 2/26/1982)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

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None

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NEW SOURCE REVIEW FORM B

PTI Number: 13-04711 Facility ID: 1318170314

FACILITY NAME Aluminum Company of America

FACILITY DESCRIPTION Modification to replace the Electro-filter Bed (EFB) control device for P104, existing 8000 ton hydraulic press, with emission reducing lubricants. CITY/TWP Cleveland

SIC CODE 3463 SCC CODE 3-09-001-99 EMISSIONS UNIT ID P104

EMISSIONS UNIT DESCRIPTION 8000 ton aluminum forging operation (company ID: 8003X Press)

DATE INSTALLED 1982

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	attainment	0.49 lb PE/hr	0.25 tons PE/yr	6.50 lb PE/hr	28.47 tons PE/yr
PM ₁₀	nonattainment	0.49 lb PE/hr	0.25 tons PE/yr	6.50 lb PE/hr	28.47 tons PE/yr
Sulfur Dioxide					
Organic Compounds	nonattainment	0.05 lb OC/hr	0.22 tons OC/yr	For lubricants that come in contact with a flame, 3 lbs/hr and 15 lbs/day or the permittee shall achieve an overall reduction of 85% by weight of OC emissions. For lubricants that do not come in contact with a flame, 8 lbs/hr and 40 lbs/day.	For lubricants that come in contact with a flame, 2.74 tons/year. For lubricants that do not come in contact with a flame, 7.30 tons/year.
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

