

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

4/29/2014

Certified Mail

Chris Kiser
MagReTech, Inc.
29695 Pettibone Road
Glenwillow, OH 44139

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318228702
Permit Number: P0106064
Permit Type: Initial Installation
County: Cuyahoga

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: CDAQ



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
MagReTech, Inc.**

Facility ID:	1318228702
Permit Number:	P0106064
Permit Type:	Initial Installation
Issued:	4/29/2014
Effective:	4/29/2014
Expiration:	4/29/2024



Division of Air Pollution Control
Permit-to-Install and Operate
for
MagReTech, Inc.

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Authorization

Facility ID: 1318228702
Application Number(s): A0039157
Permit Number: P0106064
Permit Description: Initial installation of an already-installed 5 ton per hour magnesium dross recycling operation.
Permit Type: Initial Installation
Permit Fee: \$750.00
Issue Date: 4/29/2014
Effective Date: 4/29/2014
Expiration Date: 4/29/2024
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

MagReTech, Inc.
12205 Broadway Ave.
Garfield Heights, OH 44125

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

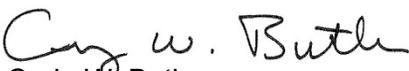
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Final Permit-to-Install and Operate

MagReTech, Inc.

Permit Number: P0106064

Facility ID: 1318228702

Effective Date: 4/29/2014

Authorization (continued)

Permit Number: P0106064

Permit Description: Initial installation of an already-installed 5 ton per hour magnesium dross recycling operation.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	F001
Company Equipment ID:	Magnesium dross and scrap recycle tumbler
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
MagReTech, Inc.
Permit Number: P0106064
Facility ID: 1318228702
Effective Date: 4/29/2014

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
MagReTech, Inc.
Permit Number: P0106064
Facility ID: 1318228702
Effective Date: 4/29/2014

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) B.2.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. Air Toxics assessment for ammonia:
 - a) Within 180 days following the issuance of this permit, the permittee shall have completed implementation of an emissions reduction plan (ERP) to reduce emissions of ammonia to concentrations that are compliant with Ohio EPA's Air Toxics policy. The ERP (as developed by Magretech, Inc.) may consist of the following measures:
 - (1) temporary control of the "rain event" tank through employment of euromatic balls and/or similar blanket-type cover;
 - (2) removal (dismantling) of the open-top "rain event" tank from service;
 - (3) transfer of the temporary control measure (euromatic balls and/or similar blanket-type cover) upon removal/shutdown of the "rain event" tank, to the active reacting tanks;
 - (4) installation of an upright settling tank to replace the rain event tank, in line with the remaining reaction tanks;
 - (5) redirection of process water flow to a pre-designated settling tank/reservoir in replacement of the "rain event" tank;
 - (6) installation of an acid injection system to control pH and the ammonia at the tumbler exit, and in effect, throughout the reaction process or usage of a similar treatment system;
 - (7) installation of partial enclosure(s) of the docks, and/or tumbler loading area (tumbler inlet) and tumbler exit with draft control;
 - (8) installation of an acid fume scrubber system (if necessary) to control ammonia emissions captured at the inlet and outlet of the reaction tumbler;
 - (9) establishment of appropriate process control(s), maintenance, and work instructions to ensure continuous capture/control and reduction of ammonia emissions; and
 - (10) any additional worksite/process improvements designed to increase production efficiency of the process.



- b) The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing within seven (7) calendar days of the completion of each step of the ERP as outlined above. The written notifications shall also identify the anticipated date(s) on which the remaining step(s) will be completed.
- c) Within thirty (30) days of completing the ERP outlined above, the permittee shall conduct or have conducted a facility-wide modeling study which identifies the following:
 - (1) the maximum quantity, of ammonia emissions generated by each ammonia emitting emissions source on an hourly and annual basis;
 - (2) the actual quantity of ammonia emissions generated by each ammonia emitting emissions source on an hourly and annual basis;
 - (3) the identification of ground-level concentrations of ammonia, as determined through computer modeling using SCREEN3 or AERMOD, beyond the fence/property line(s) owned or operated on by Magretech, Inc. and or its subsidiaries.
- d) The facility-wide modeling study results shall be submitted to the Cleveland DAQ within sixty (60) days of the ERP's completion.
- e) The applicable permitting requirements for ammonia emissions as determined by the modeling study shall be addressed accordingly through Ohio EPA's Air Toxics Policy.
- f) Failure to demonstrate compliance with the maximum allowable ground-level concentration (MAGLC) for ammonia beyond the permittee's fence/property line may result in but not be limited to requirement of additional control measures, reduction in process operating hours, and or enforcement action.



Final Permit-to-Install and Operate
MagReTech, Inc.
Permit Number: P0106064
Facility ID: 1318228702
Effective Date: 4/29/2014

C. Emissions Unit Terms and Conditions



1. F001, Magnesium dross and scrap recycle tumbler

Operations, Property and/or Equipment Description:

Magnesium dross and scrap recycle tumbler

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. b)(1)d.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Particulate matter (PM) emissions (as magnesium oxide (MgO)) shall not exceed 79.6 pounds per day and 14.53 tons per year (TPY).</p> <p>Visible emissions of fugitive dust shall not exceed ten percent opacity as a three-minute average.</p> <p>See b)(2)a. and b)(2)b. below.</p> <p>The requirements established pursuant to this rule also include the requirements of OAC rule 3745-17-07(B) and OAC rule 3745-17-08.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-05(A)(3).
c.	OAC rule 3745-17-08 RACM	The requirements specified by this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-114-01	See Section B.

(2) Additional Terms and Conditions

- a. The permittee shall employ the following best available control measure(s) in order to minimize or eliminate visible emissions of fugitive dust;
 - i. the method by which material is loaded into the tumbler shall be conducted in a manner that will minimize the drop height of the magnesium dross and scrap material;
 - ii. dusty magnesium dross and scrap material shall not be loaded into the tumbler during periods of high wind speed; and
 - iii. the operator shall avoid dragging any front-end loader bucket along the ground.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- b. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably technology requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points serving this emissions unit. The presence or absence of any visible fugitive 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 location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality (Cleveland DAQ), modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (3) The permittee shall maintain daily records of the following information using weight slips of entire trailer load and/or weight slips of containers;
 - a. the amount, in pounds of magnesium dross and scrap material processed.
- (4) The permittee shall maintain monthly records of the following information;
 - a. the amount, in pounds of magnesium dross and scrap material processed;
 - b. the amount, in pounds of magnesium reclaimed;
 - c. the average amount of magnesium contained in the magnesium dross and scrap material as a percentage, this number shall be derived by dividing the amount of magnesium reclaimed in d)(4)b. by the amount of magnesium dross and scrap material processed in d)(4)a. and multiplied by 100;
 - d. the rolling, 12-month average percentage of magnesium contained in the magnesium dross and scrap material using the percentages derived in d)(4)c.;
 - e. the amount, in gallons of water consumed by the emissions unit, and
 - f. the amount, in gallons of waste water discharged for municipal treatment.



e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.

f) Testing Requirements

- (1) Compliance with the emissions limitation(s) in b) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

PM emissions as MgO shall not exceed 79.6 lbs per day.

Applicable Compliance Method:

Compliance with the short term emission limitation shall be determined through monitoring and record requirements in section d)(3) and the following calculation:

Where:

S = lbs magnesium dross and scrap material processed per day

M = average magnesium content of scrap as a percentage*

R = amount of magnesium available for reaction – 1%

A = atomic weight of magnesium oxide

B = atomic weight of magnesium

C = control efficiency of water spray/reaction (1 - 95%)

$$S \times M \times R \times (A/B) \times C = \text{lbs PM emissions as MgO/day}$$

* magnesium percentage shall be based on the previous month found in d)(4)c.



b. Emission Limitation:

PM emissions as magnesium oxide shall not exceed 14.53 tons per year.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined through monitoring and record requirements in section d)(4) and the following calculation:

Where:

S = lbs magnesium dross and scrap material processed per calendar year

M = average magnesium content of scrap as a percentage*

R = amount of magnesium available for reaction – 1%

A = atomic weight of magnesium oxide

B = atomic weight of magnesium

C = control efficiency of water spray/reaction (1 - 95%)

T = 1 ton/2000 lbs

$S \times M \times R \times (A/B) \times C \times T = \text{tons PM as MgO/year}$

*magnesium percentage shall be based on the most recent 12-month rolling average found in d)(4)d.

c. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 10 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) This emissions unit was installed in 1989.