



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 13-04489**

**Fac ID: 1318318427**

**DATE: 6/21/2005**

Agmet Metals, Incorporated  
Fred Warren  
7800 Medusa Street  
Oakwood, OH 44146

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

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

CC: USEPA

CLAA



---

**Permit To Install  
Terms and Conditions**

**Issue Date: 6/21/2005  
Effective Date: 6/21/2005**

---

**FINAL PERMIT TO INSTALL 13-04489**

Application Number: 13-04489  
Facility ID: 1318318427  
Permit Fee: **\$500**  
Name of Facility: Agmet Metals, Incorporated  
Person to Contact: Fred Warren  
Address: 7800 Medusa Street  
Oakwood, OH 44146

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**5533 Dunham Road  
Maple Heights, Ohio**

Description of proposed emissions unit(s):  
**Pelletizer dryer -- P001.**

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

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

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 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 lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**Agmet Metals, Incorporated**  
**PTI Application: 13-04489**  
**Issued: 6/21/2005**

**Facility ID: 1318318427**

**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>
PE	1.10
NOx	1.27
CO	1.1

**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.

Operations, Property,  
and/or Equipment

Applicable Rules/Requirements

P001 - 3 tons per hour Pelletizer  
dryer vented to hydroclone  
particulate collection system with 3  
mmBtu/hour natural gas fired  
burner

OAC rule 3745-31-05(A)(3)

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

	<u>Applicable Emissions Limitations/Control Measures</u>	
OAC rule 3745-17-07(B)(1)	0.25 lb PE per hour, and 1.10 tons PE per year	3745-31-05(A)(3). The control measures specified by this rule are equivalent to the control measures established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-08(B)	0.25 lb CO per hour, and 1.10 tons CO per year from the natural gas fired burner	The particulate emission 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 3745-17-11	<p>0.29 lb NOx per hour, and 1.27 tons NOx per year from the natural gas fired burner</p> <p>Visible particulate stack emissions shall not exceed ten percent opacity, as a 6- minute average</p> <p>Visible emissions of fugitive dust shall not exceed five percent opacity, as a 3-minute average</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2)</p> <p>The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>The visible fugitive dust emission limitation specified by this rule is less stringent than the visible fugitive dust emission limitation established pursuant to OAC rule</p>	

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

- 2.a** The permittee shall employ best available control measures for the pelletizer dryer operation, including use of natural gas for the burners, for the purpose of ensuring compliance with the applicable requirements. Nothing in this paragraph shall prohibit the permittee from employing additional control measures to ensure compliance. At a minimum, the permittee shall employ a collection system to vent emissions to the hydroclone in order to minimize or eliminate visible emissions of fugitive dust.
- 2.b** The allowable emission limits for PE, CO, and NO<sub>x</sub> are set at potential to emit; Therefore, monitoring, recordkeeping, and reporting are not needed to show compliance with these emission limits.

## **B. Operational Restrictions**

None.

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

1. 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 stacks and fugitive emission points serving this emissions unit. The presence or absence of any visible particulate emissions shall be noted in an operations log. If visible particulate 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 particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible particulate emissions.

The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

**D. Reporting Requirements**

1. The permittee shall submit semiannual written reports that (a) identify each week during which any visible particulate emissions were observed from the stack or fugitive emission egress point 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 by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

- a. Emissions Limitation:  
0.25 lb PE / hour (stack and fugitive emissions)

**Applicable Compliance Method:**

Allowable was based on stack testing of uncontrolled particulate emissions performed in October of 2004. Company found that uncontrolled emissions were at 4.50 lbs PE/hour, and multiplied by the efficiency of the Hydroclone particulate collection system (99%).

$$(4.50 \text{ lbs PE/hour})(1-0.99) = 0.045 \text{ lbs PE/hour}$$

If required, compliance shall be determined by performing a stack test using Methods 1 - 5 of 40 CFR Part 60, Appendix A.

- b. Emissions Limitation:  
1.10 tons PE / year (stack and fugitive emissions)

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. Emissions Limitation:  
0.29 lb NO<sub>x</sub> / hour from the 3 mmBtu/hour natural gas fired burner

Applicable Compliance Method:

The emission factor used for this calculation (100 lbs NO<sub>x</sub>/mmcf) was taken from Section 1.4 ("Natural Gas Consumption") of AP-42, Fifth Edition, Volume 1, Chapter 1. The maximum hourly emission rate was determined as follows:

$$(100 \text{ lbs NO}_x/\text{mmcf}) \times (1 \text{ cf}/1,020 \text{ Btu}) \times (3 \text{ mmBtu}/\text{hour}) = 0.29 \text{ lb NO}_x/\text{hour}$$

- d. Emissions Limitation:  
1.27 tons NO<sub>x</sub> / year from the 3 mmBtu/hour natural gas fired burner

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.

- e. Emissions Limitation:  
0.25 lb CO / hour from the 3 mmBtu/hour natural gas fired burner

Applicable Compliance Method:

The emission factor used for this calculation (84 lb CO/mmcf) was taken from Section 1.4 ("Natural Gas Consumption") of AP-42, Fifth Edition, Volume 1, Chapter 1. The maximum hourly emission rate was determined as follows:

$$(84 \text{ lbs CO}/\text{mmcf}) \times (1 \text{ cf}/1,020 \text{ Btu}) \times (3 \text{ mmBtu}/\text{hour}) = 0.25 \text{ lb CO}/\text{hour}$$

- f. Emissions Limitation:

1.1 tons CO / year from the 3 mmBtu/hour natural gas fired burner

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.

g. Emissions Limitation:

Visible particulate emissions from the stack of the hydroclone particulate collection system shall not exceed 10% opacity as a 6-minute average.

Applicable Compliance Method:

Visible particulate emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

h. Emissions Limitation:

Visible particulate emissions of fugitive dust shall not exceed five percent opacity, as a 3-minute average

Applicable Compliance Method:

Visible fugitive particulate emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9. The points of observation for the fugitive dust emissions shall include doorways, windows, roof monitors, and any other non-stack egress point on the building serving this emissions unit.

## **F. Miscellaneous Requirements**

None.