



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 13-04700

Fac ID: 1318400068

DATE: 3/22/2007

Federal Metal Company (the)
Dale Ragazinskas
7250 Division Street
Oakwood Village, 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 of the Director is final 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 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
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

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

CC: USEPA

CLAA



FINAL PERMIT TO INSTALL 13-04700

Application Number: 13-04700
Facility ID: 1318400068
Permit Fee: **\$200**
Name of Facility: Federal Metal Company (the)
Person to Contact: Dale Ragazinskas
Address: 7250 Division Street
Oakwood Village, OH 44146

Location of proposed air contaminant source(s) [emissions unit(s)]:
**7250 Division Street
Oakwood Village, Ohio**

Description of proposed emissions unit(s):
Ch 31 modifcaiton to Rotary Melting Furnace -- P007.

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

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 (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. 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

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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)

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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.

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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.

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/PM10	15.33
Fugitive PE/PM10	5.04

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable 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 - (P007) - Rocking Furnace (F-3) rated at 8.0 MM BTU/hr using an oxy-fuel burner to melt brass and bronze scrap metal, at a maximum production rate of 5,000 lbs/hr controlled by a Shaker baghouse and/or Pulse baghouse. (Terms in the permit supercede those identified in PTI 13-03968 issued 6/2/2002.)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Stack: 0.022 grain/dscf 3.50 lbs/hr PE/PM ₁₀ 15.33 tpy PE/PM ₁₀ Fugitive: 5.04 tpy PE/PM ₁₀
	See A.2.a.
	Visible particulate emissions from the exhaust of the baghouse shall not exceed 10 percent opacity, as a six-minute average, during any sixty-minute observation period.
	Fugitive visible particulate emissions from roof vents and openings which house the emissions unit shall not exceed 10 percent opacity, as a six-minute average, during any sixty-minute observation period.
40 CFR Part 60, Subpart M	The emission limitation established by this rule is equivalent to emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A)	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07 (B)(1)	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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OAC rule 3745-17-08(B)	Reasonably available control measures must be employed sufficiently to minimize or eliminate visible emissions of fugitive dust. See A.2.b.
OAC rule 3745-17-11(B)	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
ORC 3704.03(T)(4)	See A.2.c.

2. Additional Terms and Conditions

- 2.a** In order to insure the adequacy of the baghouse emission control systems (shaker baghouse and/or pulse baghouse) for furnaces F-1 (P001), F-3 (P007), E-1 (P005), and E-2 (P006) during their charging, melting, and tapping cycles, the permittee shall not operate this furnace, F-3 (P007), simultaneously with furnace F-1 (P001), E-1 (P005) and/or E-2 (P006) while venting emissions to only one of the baghouse emission control systems (shaker baghouse or pulse baghouse), so as to maintain adequate draft at the hood and to capture all visible emissions generated during the charging, melting, and tapping cycles. The following acceptable operating furnace and baghouse combinations are summarized below:

Venting to one baghouse (shaker or pulse) or both baghouses simultaneously

F-1 (P001) Stand Alone;
 F-3 (P007) Stand Alone;
 E-1 (P005) Stand Alone;
 E-2 (P006) Stand Alone;
 F-1 (P001) and F-3 (P007);
 F-1 (P001), and E-1 (P005) and/or E-2 (P006);
 F-3 (P007), and E-1 (P005) and/or E-2 (P006); or
 E-1 (P005) and E-2 (P006)

Venting to both baghouses simultaneously only

F-1 (P001), F-3 (P007), E-1 (P005), and/or E-2(P006).

- 2.b** The permittee shall install and use hoods, fans, or other equipment to adequately enclose, contain, capture, vent and sufficiently minimize or eliminate fugitive dust.
- 2.c** The Best Available (BAT) Requirements under OAC rule 3745-31-05(A)(3) do

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not apply to the contaminants CO, OC, SO₂ and NO_x from this air contaminant source since the uncontrolled potential to emit for CO, OC, SO₂ and NO_x is less than ten tons per year.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop in inches of water, across the Shaker baghouse and Pulse baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop in inches of water, across the Shaker baghouse and Pulse baghouse on a once per shift basis.
2. Whenever the monitored value for the pressure drop deviates from the ranges specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.
3. In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable ranges specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the identity of baghouse, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.
4. The acceptable range for the pressure drop across the Shaker baghouse is 4.0 to 11.0 inches of water.

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5. The acceptable range for the pressure drop across the Pulse baghouse shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted.
6. These ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ). The permittee may request revisions to the ranges based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a administrative modification.
7. The permittee shall inspect the baghouse for leaks and visible particulate emissions at least once a month during operation periods. Records of such inspections shall include at a minimum the date the inspection was conducted, any and all results obtained, any problems discovered, and any corrective action taken.

D. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the Shaker baghouse during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous

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calendar quarter.

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse was outside of the range specified by the manufacturer;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

3. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the baghouse had any leaks or visible particulate emissions.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Part II, section A.1., of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
0.022 grain/dscf and 3.50 lbs/hr of PE/PM₁₀

Applicable Compliance Method(s):
Compliance with the mass emission limitation shall be demonstrated by using Methods 1- 5 as outlined in 40 CFR Part 60, Appendix A.
 - b. Emission Limitation:

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15.33 tpy of PE/PM₁₀

Applicable Compliance Method:

The annual emission limitation (ton/year) was established by multiplying the short term (lb/hr) emission limitation 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 short term emission limitation.

- c. Emission Limitation:
Fugitive Emissions:
5.04 tpy PE/PM₁₀

Applicable Compliance Method:

The emission limitation was developed by multiplying the uncontrolled particulate emissions (57.5 lbs/hr) by one (1) minus the capture efficiency of the baghouse(s) (98%), (1-0.98), which equals 1.15 lbs/hr, and multiplying the lb/hr value by the maximum annual hours of operation (8,760) and divide by 2,000 lbs/ton.

- d. Emission Limitation:
Visible emissions from the exhaust of the baghouse shall not exceed 10 percent opacity, as a six-minute average, during any sixty-minute observation period.

Applicable Compliance Method:

Compliance shall be determined through visible emission observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(3).

- e. Emission Limitation:
Visible fugitive emissions from roof vents and openings which house the emissions unit shall not exceed 10 percent opacity, as a six-minute average, during any sixty-minute observation period.

Applicable Compliance Method:

Compliance shall be determined through visible emission observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(3). The points of observation for visible emissions shall include any non-stack points from the building housing this

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emissions unit. Such points shall include, but are not limited to, doorways, windows, and roof monitors.

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 no later than 120 days after the issuance of the permit.
 - b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission limit for particulate emissions (pounds per hour and gr/dscf), and to determine the amount of lead emissions (pounds per hour) from this emissions unit while being vented to the Pulse baghouse.
 - c. Prior to or during the emissions testing, the gas flow rates from each emissions unit vented into the Pulse baghouse shall be measured.
 - d. The emission testing shall be performed in accordance with 40 CFR Part 60 Subpart M. The sample time and sample volume for each run shall be at least 120 minutes and 1.80 dscm (63.6 dscf).
 - e. U.S. EPA Methods 1 through 5 of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate for particulate emissions. U.S. EPA Methods 1 through 4 and 12 of 40 CFR Part 60, Appendix A shall be employed to determine the amount of lead emissions.

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

- f. Compliance with the mass emissions limit for particulate and lead emissions shall be determined by multiplying the gas flow rate from F-3 (P007) (dscfm) by the measured grain loading at the exhaust from the baghouse (gr/dscfm) and multiplying the resulting value by 60 minutes per hour and dividing by 7,000 grains per pound.
- g. 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.
- h. No 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

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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).

- i. Personnel from the Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to 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.
- j. 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).

F. Miscellaneous Requirements

None

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SIC CODE 3341 SCC CODE 3-04-002-17 EMISSIONS UNIT ID P007

EMISSIONS UNIT DESCRIPTION Rocking Furnace F-3 rated at 8.0 MM BTU/hr using an oxy-fuel burner to melt brass and bronze scrap metal.

DATE INSTALLED 4.2002

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	0.94	2.98	3.50	20.37
PM ₁₀	nonattainment			3.50	20.37
Sulfur Dioxide	attainment	0.005	0.02		
Organic Compounds	nonattainment	0.09	0.38		
Nitrogen Oxides	nonattainment	0.78	3.43		
Carbon Monoxide	attainment	0.66	2.89		
Lead		0.0044	0.019		
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? Subpart M NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
BAT is applicable to PE since annual PTE is over 10 tons per year.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____