



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

RECEIVED

JAN 14 1997

OHIO E.P.A.  
N.W.D.O.

George V. Voinovich  
Governor

Re: Permit to Install  
Ottawa County  
Application No: 03-7421  
NESHAP  
TOXIC REVIEW

CERTIFIED MAIL

P062 - shut down

June 8, 1994

BRUSH WELLMAN, INC  
LARRY CHAKO  
14710 W PORTAGE RIVER S RD  
ELMORE, OH 43416

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 Board of Review 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 with the Environmental Board of Review within thirty (30) days after notice of the Director's 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 Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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

cc: US EPA  
NORTHWEST DISTRICT OFFICE, DAPC



**Permit to Install  
Terms and Conditions**

P062

Application No. 03-7421  
APS Premise No. 0362000009  
Permit Fee: \$200.00

Name of Facility: BRUSH WELLMAN, INC

Person to Contact: LARRY CHAKO

Address: 14710 W PORTAGE RIVER S RD  
ELMORE, OH 43416

Location of proposed source(s): 14710 W PORTAGE RIVER S RD  
HARRIS TWP, OHIO

Description of proposed source(s):  
BERYLLIUM FLUORIDE ROTARY CALCINER.

Date of Issuance: June 8, 1994

Effective Date: June 8, 1994

The above named entity is hereby granted a permit to install for the above described source(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 source(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 source(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

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES(S)

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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

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the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

#### PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

#### 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.

#### APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

#### 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.

#### PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

#### NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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SOURCE OPERATION 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.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for BRUSH WELLMAN, INC located in Ottawa County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P062	Beryllium Fluoride Rotary Calciner	Compliance with the allowable emission rate use of scrubber	3745-31-05 40 CFR Part 61.32(b)	0.05 lb Be/hr (See Additional Special Terms & Conditions #1) 0.26 lb TSP/hr 9.35 lbs/hr Fluoride

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Beryllium	0.22
TSP	1.14
Fluoride	40.95

NESHAP REQUIREMENTS

The following source(s) are subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 61.

<u>Source No.</u>	<u>Source Description</u>	<u>NESHAP Regulation</u>
P062	Beryllium Fluoride Rotary Calciner	40 CFR Part 61.32(b)

The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 61 are also federally enforceable.

Pursuant to the NESHAP, the source owner/operator is required to report the following milestones:

- a. date of commencement of construction ( no later than 30 days after such date);
- b. anticipated date of initial start-up (not more than 60 days or less than 30 days prior to such date);
- c. actual date of initial start-up (within 15 days after such date); and
- d. date of performance testing (at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
Division of Air Pollution Control  
Permit Management Unit  
P.O. Box 1049  
Columbus, OH 43266-0149

and OEPA Northwest District Office - DAPC  
347 North Dunbridge Road, P.O. Box 466  
Bowling Green, Ohio 43402

#### PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.

- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutants(s):

<u>Source</u>	<u>Pollutants</u>
P062	Fluoride

#### WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

#### MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

#### MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Northwest District Office - DAPC, 347 North Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

#### AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

#### 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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Brush Wellman, Inc. shall maintain the 0.01 ug/m<sup>3</sup> monthly average Beryllium standard as specified in the National Emission Standard for Hazardous Air Pollutants (NESHAP) 40 CFR Part 61.32(b).
2. Brush Wellman, Inc. shall cease operation of the five furnaces permitted under part of Source No. P026 when the new furnace Source No. P062 becomes operational.
3. Brush Wellman, Inc. shall conduct stack test for fluoride emission within 90 days of the start-up of the fluoride furnace (P062).
4. Brush Wellman, Inc. shall operate and maintain, in good working condition, the scrubbing system at all times to ensure that the scrubbing system is operating at a minimum control efficiency of 97% and shall monitor and record on an hourly basis the differential pressure loss across the scrubber(s), the scrubber(s) water volume, and the scrubber(s) water pressure at all times Source P062 is operating.

Brush Wellman, Inc. shall continuously monitor the following parameters to ensure that the scrubbing system is operating at a minimum control efficiency of 97% at all times:

- a. Gas scrubbing system water flow meters shall be monitored as follows:

<u>Flow Meter Location</u>	<u>Alarm Set Points (gpm)</u>		
	Low	Design	High
Quench Water	31	35	39
Primary PTS Sprays (recycled)	82	92	101
Secondary PTS Sprays (recycled)	82	92	101
Tertiary PTS Sprays (make-up)	3	5	-
Discharged From Primary PTS	-	3	-

PTS = packed tower scrubber

- b. Scrubber differential pressure drop:

The scrubber differential pressure drop shall be constantly monitored and displayed on the operating graphics screen. The normal operating differential pressure shall be 8" WC with high alarm setpoint of 12" WC.

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This facility shall submit quarterly reports to the Ohio EPA, Northwest District Office documenting scrubber pressure drop(s), scrubber water volume(s), and scrubber water pressure values less than specified as determined by the performance stack test in Special Term and Condition No. 3 and specified in (a) and (b) of this term and condition.

If during any calendar quarter, the scrubber pressure drop(s), scrubber water volume(s), and scrubber water pressure values less than specified as determined by the performance stack test in Special Term and Condition No. 3 and specified in (a) and (b) of this term and condition, this facility shall submit, in detail, the following additional information to the Ohio EPA, Northwest District Office within 15 days following the end of the calendar quarter:

- (c) the cause(s) for the excursion(s), and
- (d) the action which has been taken and/or will be taken by this facility to correct the cause(s) for the excursion(s).

If no exceedances occurred, a report stating that fact is still required.

These quarterly reports shall be submitted by February 1, May 1, August 1, and November 1 of each year and shall address the data obtained during the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).