



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
PORTAGE 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: 16-02477

Fac ID: 1667060141

DATE: 4/17/2007

Aluminum Wheel Technologies Inc
Percy Kanga
446 W Lake St
Ravenna, OH 44266-3649

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

ARAQMD



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 4/17/2007

FINAL PERMIT TO INSTALL 16-02477

Application Number: 16-02477
Facility ID: 1667060141
Permit Fee: **\$500**
Name of Facility: Aluminum Wheel Technologies Inc
Person to Contact: Percy Kanga
Address: 446 W Lake St
Ravenna, OH 44266-3649

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

**446 W Lake St
Ravenna, Ohio**

Description of proposed emissions unit(s):

Shot Blast Unit, Scrap Drying Oven.

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

Aluminum Wheel Technologies Inc
PTI Application: 16-02477
Issued: 4/17/2007

Facility ID: 1667060141

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)

Aluminum Wheel Technologies Inc
PTI Application: 16-02477
Issued: 4/17/2007

Facility ID: 1667060141

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.

Aluminum Wheel Technologies Inc
 PTI Application: 16-02477
 Issued: 4/17/2007

Facility ID: 1667060141

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	1.1
D/F	2.7375E-09
NOx	0.1

Aluminum Wheel Technologies Inc
PTI Application: 16-02477
Issued: 4/17/2007

Facility ID: 1667060141

CO

0.17

Issued: 4/17/2007

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 - (P001) - Aluminum Scrap Drying Oven

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See A.2.e.
40 CFR Part 63, Subpart RRR	3.5 x 10 ⁻⁶ grain (0.25 µg/Mg) of D/F TEQ per ton of feed/charge See sections A.2.b, A.2.c, A.2, B.1 and B.2.
OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-17-11(B)	0.551 lb PE/hr

2. Additional Terms and Conditions

- 2.a This emissions unit is classified as an aluminum scrap dryer to dry precleaned aluminum wheels at 900°F. This unit shall be tested for dioxins/furans according to 40 CFR 63.1512 "Performance test/compliance demonstration requirements and procedures."
- 2.b The permittee may petition the Director to remove this dryer from the requirements of 40 CFR Part 63 Subpart RRR in the event the stack test didn't detect the presence of dioxins/furans while drying mechanically precleaned aluminum wheels.
- 2.c The permittee must provide and maintain easily visible labels posted at this emissions unit that identify the applicable emission limits and means of compliance, including the type of emissions unit (e.g. aluminum scrap dryer) and the applicable operational standards and control methods (work practice or control device.) This includes, but is not limited to, the type of charge to be used (e.g., clean scrap only, all scrap, etc.), and the applicable operating parameter ranges and requirements as incorporated in the OM&M plan.

Issued: 4/17/2007

Emissions Unit ID: **F004**

Issued: 4/17/2007

- 2.d** The permittee shall perform the following:
- i. install and operate a device that measures and records or otherwise determines the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test; and
 - ii. operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
- 2.e** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, NO_x and CO emissions from this air contaminant source since the uncontrolled potential to emit* for PE, NO_x and CO is each less than ten tons per year.

* PTE for PE, NO_x and CO is 1.1 tons/year, 0.1 ton/year, and 0.17 ton/year, respectively

B. Operational Restrictions

1. The permittee shall use precleaned aluminum wheels according to the established conditions in the OM&M plan.
2. The oven temperature for drying precleaned aluminum wheels shall be maintained at a minimum of 900°F.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the holding temperature in the oven, and assures that the temperature is maintained at 900°F.
2. The permittee shall prepare and submit to the Akron Regional Air Quality Management District (ARAQMD), an operation, maintenance and monitoring (OM&M) plan and a startup, shutdown and malfunction plan (SSMP), as applicable, pursuant to section 63.1510.
3. The permittee must inspect the labels for this emissions unit at least once per calendar month to confirm that posted labels as required by A.2.c are intact and legible.
4. To determine the feed/charge rate, the permittee must install, calibrate, operate and

Emissions Unit ID: **F004**

maintain a device to measure and record the total weight of feed/charge to the emissions unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production must be measured and recorded on an emissions unit-by-emissions unit basis.

- a. The accuracy of the weight measurement device or procedure must be ± 1 percent of the weight being measured. The permittee may apply to the Director (the ARAQMD) for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the emissions unit will meet the relevant emission standard.
 - b. The permittee must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.
5. For the drying oven operating temperature, the permittee shall:
- a. Install, calibrate, maintain, and operate a device to continuously monitor and record the temperature of the oven.
 - b. The temperature monitoring device must meet each of these performance and equipment specifications.
6. The permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and 40 CFR Part 63, Subpart RRR.
- a. The permittee must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.
 - b. The permittee may retain records on microfilm, computer disks, magnetic tape or microfiche; and
 - c. the permittee may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.
7. The permittee must design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice". The permittee shall operate each capture/collection system according to the procedures and requirements

Issued: 4/17/2007

in the OM&M plan.

D. Reporting Requirements

1. The permittee must submit an initial notification to the Director (the ARAQMD), as required pursuant to 40 CFR 63.1515(a).
2. The permittee must submit an updated notification of compliance status report within 60 days after the compliance date established by 40 CFR 63.1501(a), as required pursuant to 40 CFR 63.1515(b).
3. The permittee must develop a startup, shutdown and malfunction and a program of corrective action for malfunctioning process used to comply with the standard. The permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown or malfunction is not consistent with the procedure in the plan as described in 40 CFR 63.6(e)(3).
4. The permittee must submit semiannual reports according to the requirements in 63.10(e)(3). Except, the permittee must submit the semiannual reports within 60 days after the end of each 6-month period instead of within 30 days after the calendar half as specified in 63.10(e)(3)(v). When no deviations of parameters have occurred, the permittee must submit a report stating that no excess emissions occurred during the reporting period. A report must be submitted if any of these conditions occur during a 6-month reporting period:
 - a. An excursion of a complaint process or operating parameter value or range (e.g., oven operating temperature, definition of acceptable scrap or other approved operating parameter).
 - b. An action taken during a startup, shutdown or malfunction was not consistent with the procedures in the plan as described in 63.6(e)(3).
 - c. The emissions unit was not operated according to the requirements of this subpart.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emissions Unit ID: **F004**

- a. Emission Limitation:
3.5 x 10⁻⁶ grain (0.25 ug/Mg) of D/F TEN per ton of feed/charge to the furnace

Applicable Compliance Method:

Compliance shall be demonstrated based on the results of emission testing conducted in accordance with Method 1 - 4 and 23 of 40 CFR Part 60, Appendix A.

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

Issued: 4/17/2007

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

- c. Emission Limitation:
0.551 lb PE/hr

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

- 2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 90 days after startup, except the D/F test shall be conducted within 90 days. All of the tests shall be conducted while the furnace is operating at or near the maximum feed/charge rate.
 - b. The emission testing shall be conducted to demonstrate compliance with the D/F short term limitation. The testing shall also establish the maximum precleaned aluminum wheels charge rate and monitoring method.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4, and Method 23 for D/F. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the ARAQMD.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the ARAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the ARAQMD's refusal to accept the results of the emission test(s).
 - f. Personnel from the ARAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure

Issued: 4/17/2007

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

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

F. Miscellaneous Requirements

None