



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43227-4099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

U.E.P.A.
S.E.D.O.
99 JUL -7 AM 10:31

Re: Permit to Install
Jackson County
Application No: 06-5743
NSPS

CERTIFIED MAIL

June 30, 1999

ALUCHEM OF JACKSON INC
FRED KOONS
14782 BEAVER PIKE
JACKSON, OH 45640

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 with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: US EPA
SOUTHEAST DISTRICT OFFICE, DAPC

**Permit to Install
Terms and Conditions**

Application No. 06-5743
APS Premise No. 0640000005
Permit Fee: \$600.00

Name of Facility: ALUCHEM OF JACKSON INC

Person to Contact: FRED KOONS

Address: 14782 BEAVER PIKE
JACKSON, OH 45640

Location of proposed source(s): 14782 BEAVER PIKE
JACKSON, OHIO

Description of proposed source(s):
10,000 LB/HR CONTINUOUS ALUMINUM OXIDE DRYER.

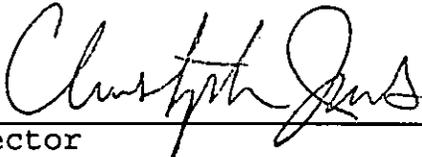
Date of Issuance: June 30, 1999

Effective Date: June 30, 1999

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

Page 2 of 11

Facility Name: Aluchem of Jackson Inc

Application Number: 06-5743

Date: June 30, 1999

GENERAL PERMIT CONDITIONS

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

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.

Page 3 of 11

Facility Name: **Aluchem of Jackson Inc**

Application Number: **06-5743**

Date: **June 30, 1999**

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 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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 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.

Page 4 of 11

Facility Name: AluChem of Jackson Inc

Application Number: 06-5743

Date: June 30, 1999

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 filed no later than thirty days after commencement of operation.

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 and regulations.

Facility Name: Aluchem of Jackson Inc

Application Number: 06-5743

Date: June 30, 1999

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for Aluchem of Jackson Inc located in Jackson County. The emissions units 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.

Ohio EPA Source Identification Number	Source Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P021	10,000 lbs/hr Continuous Aluminum Oxide Dryer	fabric filter and enclosed inside of a building	40 CFR 60.382 NSPS Subpart LL Stack Emissions	0.050 grams per dry cubic meter particulate (0.0218 gr/dscf) (1.40 lbs/hr) (6.13 TPY)
			Fugitive Emissions (emissions not collected by a capture system)	Fugitive emissions shall not exceed 10% opacity

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Particulate	6.13

Facility Name: AluChem of Jackson Inc

Application Number: 06-5743

Date: June 30, 1999

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
P021	10,000 LBS/HR CONTINUOUS ALUMINUM OXIDE DRYER	Subpart LL

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

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

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and Ohio EPA Southeast District Office
2195 Front Street
Logan, Ohio 43138

Facility Name: Aluchem of Jackson Inc

Application Number: 06-5743

Date: June 30, 1999

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 Ohio EPA Southeast District Office 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>Pollutant(s)</u>
P021	Particulate (TSP)

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

Page 8 of 11

Facility Name: AluChem of Jackson Inc

Application Number: 06-5743

Date: June 30, 1999

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Ohio EPA Southeast District Office, 2195 Front Street, Logan, Ohio 43138.

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 Ohio EPA Southeast District Office, 2195 Front Street, Logan, Ohio 43138.

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.

Facility Name: Aluchem of Jackson Inc

Application Number: 06-5743

Date: June 30, 1999

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

A. Applicable Emission Limitations and/or Control Requirements

None

B. Operational Restrictions

1. The continuous aluminum oxide dryer shall be adequately enclosed and vented to a fabric filter. The enclosure shall be sufficient to minimize at all times emissions of fugitive dust. The fabric filter shall achieve an outlet emission rate of not greater than 0.050 grams per dry standard cubic meter of exhaust gases and there shall be no fugitive emissions greater than 10 percent opacity.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records which list the following information ;
 - a. the total tons of material that was transferred through this emission unit; and,
 - b. the total number of hours of operation for this emission unit.
2. The permittee shall perform daily observations for any visible particulate emissions (stack or fugitive) from this emission unit. The visible emission observations shall be conducted during a normal representative period when material is being transferred through the emission unit. The presence or absence of any visible particulate emissions (stack or fugitive) shall be recorded in an operation log. If any visible emissions are observed from

Facility Name: AluChem of Jackson Inc

Application Number: 06-5743

Date: June 30, 1999

the stack, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be recorded in the operations log.

D. Reporting Requirements

1. The permittee shall submit an annual exceedance report which identifies any exceedances of the above conditions, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If an exceedance did not occur during the reporting period, then a report stating that fact is required.
2. For each excursion event, the following information shall be provided:
 - a. the date of the excursion;
 - b. the duration of the excursion event;
 - c. the operating rates during the excursion;
 - d. the cause(s) of the excursion; and,
 - e. the corrective action(s) which have or will be taken to prevent similar excursions in the future.

E. Compliance Determination / Testing Requirements

1. Compliance with the emission limitations in this permit shall be determined in accordance with the following methods :

Emission Limitation : 0.050 grams/dry standard cubic meter particulate emissions (6.13 TPY)

Applicable Compliance Method: Within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup of the emission unit, the permittee shall demonstrate compliance by testing in accordance with 40 CFR 60.8 and 40 CFR 60.386 .

Annual emissions may be calculated in accordance with the emission rates obtained during the most recent stack test evaluation and the monitoring and recordkeeping

Page 11 of 11

Facility Name: **AluChem of Jackson Inc**

Application Number: **06-5743**

Date: **June 30, 1999**

requirements contained in this permit for the emission period.

Emission Limitation :

Fugitive Emissions (10 percent opacity)

Applicable Compliance Method:

Compliance shall be demonstrated by Method 9 or Method 22, 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

None.