



State of Ohio Environmental Protection Agency

Cole

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

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

MAILING ADDRESS:

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

O-E-P-A:
S.E.D.O.

95 JUL 31 AM 10:46

Re: Permit to Install
Washington County
Application No: 06-4344
NSPS
SYNTHETIC MINOR

CERTIFIED MAIL

July 26, 1995

ELKEM METALS CO.
JOHN HUGHES
P.O. BOX 299
MARIETTA, OH 45750

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
SOUTHEAST DISTRICT OFFICE, DAPC

Permit to Install Terms and Conditions

Application No. 06-4344
APS Premise No. 0684020006
Permit Fee: \$400.00

Name of Facility: ELKEM METALS CO.

Person to Contact: JOHN HUGHES

Address: P.O. BOX 299
MARIETTA, OH 45750

Location of proposed source(s): 7 MI N OF RT 7 & U.S. RT 50
MARIETTA, OHIO

Description of proposed source(s):
TWO 75,000 PPH NATURAL GAS BOILERS (95 MMBTU/HR) WITH OPERAT
ING RESTRICTION.

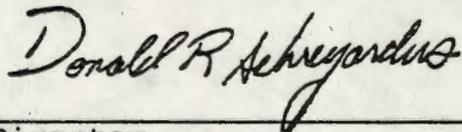
Date of Issuance: July 26, 1995

Effective Date: July 26, 1995

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)

ELKEM METALS CO.
Application No. 06-4344
Page 3 of 8
July 26, 1995

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 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 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.

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, regulations, and policies.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for ELKEM METALS CO. located in Washington 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 & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
B006	95 MMBTU/hr natural gas boiler #1 (temporary power replacement)	Flue gas recirculation natural gas as fuel 0.085 lbs NO _x /MMBTU	3745-31-05 (A)(3) 3745-17-10 (B)(1) 40 CFR 60 Subpart Dc	The maximum allowable amount of particulate emissions shall be 0.59 lb/hr. ^{2.58 TW} Total hourly emissions of SO ₂ shall not exceed 0.06 pounds. Total hourly emissions of NO _x shall not exceed ^{35 TW} 8.00 pounds. Total hourly emissions of CO shall not exceed 3.33 pounds. Total hourly emissions of total VOC shall not exceed 0.55 pounds.
B007	95 MMBTU/hr natural gas boiler #2 (temporary power replacement)	Flue gas recirculation natural gas as fuel 0.085 lbs NO _x /MMBTU	3745-31-05 (A)(3) 3745-17-10 (B)(1) 40 CFR 60 Subpart Dc	The maximum allowable amount of particulate emissions shall be 0.59 lb/hr. Total hourly emissions of SO ₂ shall not exceed 0.06 pounds. Total hourly emissions of NO _x shall not exceed 8.00 pounds. Total hourly emissions of CO shall not exceed 3.33 pounds. Total hourly emissions of total VOC shall not exceed 0.55 pounds.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
TSP	1.72
SO ₂	0.18
VOC	1.6
NO _x	23.36
CO	9.72

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 No.</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
B006	95 MMBTU Natural Gas Boiler	40 CFR 60 Subpart Dc
B007	95 MMBTU Natural Gas Boiler	40 CFR 60 Subpart Dc

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 1049
Columbus, OH 43216-1049

and OEPA Southeast District Office - DAPC
2195 Front Street
Logan, Ohio 43138

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>
B006	NO _x
B007	NO _x

REPORTING REQUIREMENTS

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

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 Southeast District Office - DAPC, 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.

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.

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. Operating Restrictions:

These are temporary units that will replace the power supplied by AMP-Ohio (a coal-fired power plant) during its scheduled shutdown. This will result in a significant reduction in emissions during the shutdown time period.

Total hours of operation shall be limited to 2920 hours annually for each unit, on a rolling 365 day basis. Once they have reached 2920 hours of operation they will be removed from the facility shutdown until Elkem Metals has received new permits. Annual emissions of NO_x shall not exceed 23.36 tons per year.

ELKEM METALS CO.
Application No. 06-4344
Page 8 of 8
July 26, 1995

2. Recordkeeping:

An operating log shall be maintained for both B006 and B007 which indicates total daily and annual, rolling 365 day, hours of operation. The total rolling 365 day hours of operation shall be calculated daily by adding the hours operated that day to the hours operated over the previous 364 days.

These logs will be kept at the operating location and be made available to Ohio EPA personnel upon request. All supporting records and documentation shall be maintained for a minimum of three years.