State of Ohio Environmental Protection Agency

STREET ADDRESS:
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Columbus, Ohio 43215

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MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

Certified Mail

| | |
|---|---|
| No | TOXIC REVIEW |
| No | PSD |
| No | SYNTHETIC MINOR |
| No | CEMS |
| Yes | MACT |
| No | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | MAJOR NON-ATTAINMENT |
| No | MODELING SUBMITTED |

4/22/2009

Mark Kolb
Quantum Metals
3675 Taft Ave.
lebanon, OH 45036

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1483060439
Permit Number: P0104816
Permit Type: Renewal
County: Warren

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of $70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Hamilton County Dept. of Environmental Services. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: HCDOES

**State of Ohio Environmental Protection Agency**
**Division of Air Pollution Control**

# FINAL

# Air Pollution Permit-to-Install and Operate
for
Quantum Metals

Facility ID: 1483060439
Permit Number: P0104816
Permit Type: Renewal
Issued: 4/22/2009
Effective: 4/22/2009
Expiration: 4/22/2019

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

# Air Pollution Permit-to-Install and Operate
for
Quantum Metals

**Table of Contents**


Authorization ..... 1

A. Standard Terms and Conditions ..... 3

1. What does this permit-to-install and operate ("PTIO") allow me to do? ..... 4
2. Who is responsible for complying with this permit? ..... 4
3. What records must I keep under this permit? ..... 4
4. What are my permit fees and when do I pay them? ..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 5
7. What reports must I submit under this permit? ..... 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? ..... 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ..... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 6
13. Can I transfer this permit to a new owner or operator? ..... 6
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 7
15. What happens if a portion of this permit is determined to be invalid? ..... 7

B. Facility-Wide Terms and Conditions ..... 8

C. Emissions Unit Terms and Conditions ..... 10

1. N001, R Unit ..... 11

# Authorization

Facility ID: 1483060439
Application Number(s): A0037422
Permit Number: P0104816
Permit Description: Scrap Metal Decoating Kiln Renewal Permit
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 4/22/2009
Effective Date: 4/22/2009
Expiration Date: 4/22/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Quantum Metals
3675 Taft Ave.
lebanon, OH 45036

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

# Authorization (continued)

Permit Number: P0104816
Permit Description: Scrap Metal Decoating Kiln Renewal Permit

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

| | |
|---|---|
| **Emissions Unit ID:** | **N001** |
| Company Equipment ID: | R Unit |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |

# A. Standard Terms and Conditions

1. **What does this permit-to-install and operate ("PTIO") allow me to do?**

   This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. **Who is responsible for complying with this permit?**

   The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

   The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. **What records must I keep under this permit?**

   You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. **What are my permit fees and when do I pay them?**

   There are two fees associated with permitted air contaminant sources in Ohio:

   - PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

     You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

   - Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. **When does my PTIO expire, and when do I need to submit my renewal application?**

   This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Hamilton County Dept. of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

# B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

# C. Emissions Unit Terms and Conditions

**1. N001, R Unit**

**Operations, Property and/or Equipment Description:**

scrap metal decoating kiln with afterburner

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3) | Particulate emissions shall not exceed 0.34 pound per hour and 1.5 tons per year.<br><br>Particulate emissions less than 10 microns in diameter shall not exceed 0.34 pound per hour and 1.5 tons per year.<br><br>Sulfur dioxide emissions shall not exceed 0.05 pound per hour and 0.22 ton per year.<br><br>Organic compound emissions shall not exceed 0.07 pound per hour and 0.31 ton per year.<br><br>Nitrogen oxide emissions shall not exceed 0.37 pound per hour and 1.62 tons per year.<br><br>Carbon monoxide emissions shall not |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | exceed 0.05 pound per hour and 0.22 ton per year.<br><br>Hydrogen chloride emissions shall not exceed 0.31 pound per hour and 1.4 tons per year.<br><br>Hydrogen fluoride emissions shall not exceed 0.02 pound per hour and 0.1 ton per year.<br><br>Dioxan/furan emissions shall not exceed 1.5E-09 ton per year.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), OAC rule 3745-17-09(B), OAC rule 3745-17-09(C), and 40 CFR Part 63, Subpart RRR. |
| b. | OAC rule 3745-17-07(A)(1) | Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule. |
| c. | OAC rule 3745-17-09(B) | See b)(2)a. |
| d. | OAC rule 3745-17-09(C) | See b)(2)b. |
| e. | 40 CFR Part 63, Subpart RRR | See b)(2)d., and c)(1) through c)(4). |

(2) Additional Terms and Conditions

a. Particulate emissions in the exhaust gases shall not exceed 0.10 pound per one hundred pounds of liquid, semi-solid or refuse and salvageable material charged.

b. The incinerator, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.

c. The hourly and annual emission limitations outlined in b)(1) except for dioxin/furan are based upon the emissions unit=s potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.

d. The dioxin/furan emissions TEQ shall not exceed 5.0 micrograms per Megagram (7.0 E-5 grain per ton) of feed/charge from the decoating kiln.

The permittee is complying with the alternative emission limits in 40 CFR 63.1505(e) since the emissions unit is equipped with an afterburner having a residence time of at least one second and the afterburner is operated at a temperature of at least 1400 degrees Fahrenheit.

c) Operational Restrictions

(1) Pursuant to 40 CFR 63.1506(b), the permittee must provide and maintain easily visible labels, posted at the decoating kiln, that identifies the type of affected emissions unit, the applicable emissions limits and means of compliance including the afterburner operating temperature and design residence time.

(2) The permittee shall maintain the capture/collection system in accordance with 40 CFR 63.1506(c).

(3) Pursuant to 40 CFR 63.1506(d)(1), the permittee must install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test. The permittee must operate each weight measurement system or other weight determination procedure in accordance with the operation, maintenance, and monitoring (OM&M) plan.

(4) Pursuant to 40 CFR 63.1505(e), the permittee must maintain the 3-hour block average operating temperature of the afterburner at or above 1400 degrees Fahrenheit. The permittee must operate the afterburner in accordance with the OM&M plan.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the general record keeping requirements in 40 CFR 63.1517.

(2) On and after the date the initial performance test is completed or required to be complete, whichever date is earlier, the permittee must monitor all control equipment and processes according to the requirements pursuant to 40 CFR 62.1510.

(3) Pursuant to 40 CFR 63.1510(b), the permittee must prepare and implement a written operation, maintenance, and monitoring (OM&M) plan. The permittee must submit the plan to the applicable permitting authority for review and approval as part of the application for a part 70 or part 71 permit. The plan must be accompanied by a written certification by the permittee that the OM&M plan satisfies all requirements of this section and is otherwise consistent with the requirements of this subpart. The permittee must comply with all of the provisions of the OM&M plan as submitted to the permitting authority, unless and until the plan is revised in accordance with the following procedures. If the permitting authority determines at any time after receipt of the OM&M plan that any revisions of the plan are necessary to satisfy the requirements of this section or this subpart, the permittee must promptly make all necessary revisions and submit the revised plan. If the permittee determines that any other revisions of the OM&M plan are necessary, such revisions will not become effective until the permittee submits a description of the changes and a revised plan incorporating them to the permitting authority.

(4) The permittee must inspect the labels for the decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard are intact and legible [see c)(1)] and record the results of each inspection.

(5) The permittee shall inspect the capture/collection system at least once each calendar year to ensure the system is operating in accordance with the requirements of 40 CFR 63.1506(c) and record the results of each inspection.

(6) The permittee must calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emissions unit over the same operating cycle or time period used in the performance test. As an alternative to a measurement device, the permittee may use a procedure acceptable to the Hamilton County Department of Environmental Services to determine the total weight of feed/charge or aluminum production to the affected source or emissions unit:

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 Hamilton County Department of Environmental Services 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 affected source will meet the relevant emissions standard; and

b. the permittee must verify the calibration of the weight measurement device in accordance with the schedule specified my the manufacturer, or if no calibration schedule is specified, at least once every 6 months.

(7) The permittee shall maintain the afterburner and records pursuant to the following requirements:

a. the permittee must install, calibrate, maintain, and operate a device to continuously monitor and record the operating temperature of the afterburner consistent with the requirements for continuous monitoring systems in subpart A of 40 CFR 63;

b. the temperature monitoring device must be installed at the exit of the combustion zone of the afterburner;

c. the monitoring system must record the temperature in 15-minute block averages and determine and record the average temperature for each 3-hour block period, including any period when the average temperature in any 3-hour block period falls below the compliant operating parameter value with a brief explanation of the cause of the excursion and the corrective action taken;

d. the recorder response range must include zero and 1.5 times the average temperature established according to the requirements in 40 CFR 63.1512(m);

e. the reference method must be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference, subject to approval by the Administrator; and

f. the permittee must conduct an inspection of the afterburner at least once a year and record the results. At a minimum, an inspection must include:

i. an inspection of all burners, pilot assemblies, and pilot sensing devices for proper operation and clean pilot sensor;

ii. an inspection for proper adjustment of combustion air;

iii. an inspection of internal structures (e.g., baffles) to ensure structural integrity;

iv. an inspection of dampers, fans, and blowers for proper operation;

v. an inspection for proper sealing;

vi. an inspection of motors for proper operation;

vii. an inspection of combustion chamber refractory lining and clean and replace lining as necessary;

viii. an inspection of afterburner shell for corrosion and/or hot spots;

ix. documentation, for the burn cycle that follows the inspection, that the afterburner is operating properly and any necessary adjustments have been made; and

x. verification that the equipment is maintained in good operating condition.

Following an equipment inspection, all necessary repairs must be completed in accordance with the requirements of the OM&M plan.

(8) The permit to install for this emissions unit (N001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit=s exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA=s ARevieW of New Sources of Air Toxic Emissions@ policy (AAir Toxic Policy@) was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the Aworst case@ pollutant(s):

Pollutant: HCl

TLV (ug/m3): 2198

Maximum Hourly Emission Rate (lbs/hr): 0.31

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 11.77

MAGLC (ug/m3): 52.3

Physical changes to or in the method of operation of the emissions unit after it=s installation or modification could affect the parameters used to determine whether or not the AAir Toxics Policy@ is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the AAir Toxic Policy@ will still be satisfied. If, upon evaluation, the permittee determines that the AAir Toxic Policy@ will not be satisfied, the permittee will not make the change.

Changes that can affect the parameters used in the AAir Toxic Policy@ include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the AAir Toxic Policy@ will be satisfied with the above changes, the Ohio EPA will not consider the change(s)to be a Amodification@ under OAC rule 3745-31-01, and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:

a. description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it=s evaluation and determination that the changed emissions unit still satisfies the AAir Toxic Policy@; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the AAir Toxic Policy@ for the change.

e) Reporting Requirements

(1) The owner or operator must develop and implement a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The owner or operator 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 procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:

a. procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and

b. corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.

(2) As required by 40 CFR 63.10(e)(3), the owner or operator must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). When no deviations of parameters have occurred, the owner or operator 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 compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet 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 40 CFR 63.6(e)(3); or

c. an affected source (including an emissions unit in a secondary aluminum processing unit) was not operated according to the requirements of 40 CFR 63 Subpart RRR.

The owner or operator must submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

The particulate emissions from this emissions unit shall not exceed 0.34 pound per hour and 1.5 TPY.

Particulate emissions in the exhaust gases shall not exceed 0.10 pound per one hundred pounds of liquid, semi-solid or refuse and salvageable material charged.

Applicable Compliance Method:

The above emission limitation is based upon a performance test conducted on a similar emissions unit. If needed performance testing for particulate emissions will be conducted using Method 5 of 40 CFR Part 60, Appendix A. Compliance with the annual limit is determined by multiplying the hourly limit by 8760 hours/year then dividing by 2000 pounds/ton.

b. Emission Limitations:

The particulate emissions less than 10 microns in diameter from this emissions unit shall not exceed 0.34 pound per hour and 1.5 TPY.

Applicable Compliance Method:

The above emission limitation is based upon a performance test conducted on a similar emissions unit. If needed performance testing for particulate emissions less than 10 microns in diameter will be conducted using Method 201 of 40 CFR Part 51, Appendix M. Compliance with the annual limit is determined by multiplying the hourly limit by 8760 hours/year then dividing by 2000 pounds/ton.

c. Emission Limitations:

The sulfur dioxide emissions from this emissions unit shall not exceed 0.05 pound per hour and 0.22 TPY.

Applicable Compliance Method:

The above emission limitation is based upon a performance test conducted on a similar emissions unit. If needed performance testing for sulfur dioxide emissions will be conducted using Method 6 of 40 CFR Part 60, Appendix A. Compliance with the annual limit is determined by multiplying the hourly limit by 8760 hours/year then dividing by 2000 pounds/ton.

d. Emission Limitations:

The organic compound emissions from this emissions unit shall not exceed 0.07 pound per hour and 0.31 TPY.

Applicable Compliance Method:

The above emission limitation is based upon a performance test conducted on a similar emissions unit. If needed performance testing for organic compound emissions will be conducted using Method 25 of 40 CFR Part 60, Appendix A. Compliance with the annual limit is determined by multiplying the hourly limit by 8760 hours/year then dividing by 2000 pounds/ton.

e. Emission Limitations:

The nitrogen oxide emissions from this emissions unit shall not exceed 0.37 pound per hour and 1.62 TPY.

Applicable Compliance Method:

The above emission limitation is based upon a performance test conducted on a similar emissions unit. If needed performance testing for nitrogen oxide emissions will be conducted using Method 7 of 40 CFR Part 60, Appendix A. Compliance with the annual limit is determined by multiplying the hourly limit by 8760 hours/year then dividing by 2000 pounds/ton.

f. Emission Limitations:

The carbon monoxide emissions from this emissions unit shall not exceed 0.05 pound per hour and 0.22 TPY.

Applicable Compliance Method:

The above emission limitation is based upon a performance test conducted on a similar emissions unit. If needed performance testing for carbon monoxide oxide emissions will be conducted using Method 10 of 40 CFR Part 60, Appendix A. Compliance with the annual limit is determined by multiplying the hourly limit by 8760 hours/year then dividing by 2000 pounds/ton.

g. Emission Limitations:

The hydrogen chloride emissions from this emissions unit shall not exceed 0.31 pound per hour and 1.4 TPY.

Applicable Compliance Method:

The above emission limitation is based upon a performance test conducted on a similar emissions unit. If needed performance testing for hydrogen chloride emissions will be conducted using Method 26 of 40 CFR Part 60, Appendix A. Compliance with the annual limit is determined by multiplying the hourly limit by 8760 hours/year then dividing by 2000 pounds/ton.

h. Emission limitations:

The hydrogen fluoride emissions from this emissions unit shall not exceed 0.02 pound per hour and 0.1 TPY.

Applicable Compliance Method:

The above emission limitation is based upon a performance test conducted on a similar emissions unit. Compliance with the annual limit is determined by multiplying the hourly limit by 8760 hours/year then dividing by 2000 pounds/ton.

i. Emission Limitations:

The dioxan/furan emissions TEQ shall not exceed 5.0 micrograms per Megagram (7.0 E-5 grain/ton) of feed/charge from the decoating kiln.

Applicable Compliance Method:

Compliance with the above emission limitation was determined upon a performance test conducted on June 10, 2005. If needed further testing for dioxan/furan will be conducted using Method 23 of 40 CFR Part 60, Appendix A.

j. Emission Limitations:

The dioxan/furan emissions shall not exceed 1.5E-09 TPY.

Applicable Compliance Method:

Compliance with the above emission limitation was determined by multiplying the hourly emission rate of 0.00000000033 pound/hour by 8760 hours/year then dividing by 2000 pounds/ton.

k. Emission Limitations:

Visible particulate emissions shall not exceed 20 percent opacity as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

**F. Miscellaneous Requirements**

1. The permittee shall comply with all other applicable provisions in 40 CFR Part 60, Appendix A not noted above.