



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

9/20/2010

Certified Mail

Paul Platek
IMCO Recycling of Ohio LLC
7335 Newport Road Southeast
Uhrichsville, OH 44683

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0679030152
Permit Number: P0106797
Permit Type: OAC Chapter 3745-31 Modification
County: Tuscarawas

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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, made payable to "Ohio Treasurer Kevin Boyce," 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

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Southeast District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: U.S. EPA
Ohio EPA-SEDO; Pennsylvania; West Virginia



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
IMCO Recycling of Ohio LLC**

Facility ID: 0679030152
Permit Number: P0106797
Permit Type: OAC Chapter 3745-31 Modification
Issued: 9/20/2010
Effective: 9/20/2010



Division of Air Pollution Control
Permit-to-Install
for
IMCO Recycling of Ohio LLC

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Authorization

Facility ID: 0679030152
Facility Description: Recycling center.
Application Number(s): A0040153
Permit Number: P0106797
Permit Description: Chapter 31 modification of PTI #06-3362, issued 5/6/92, to increase allowable emissions due to replacement of the 12 million BTU/hr burner with a 17 million BTU/hr burner.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$400.00
Issue Date: 9/20/2010
Effective Date: 9/20/2010

This document constitutes issuance to:

IMCO Recycling of Ohio LLC
7335 Newport Road Southeast
7319 Newport Road Southeast
Uhrichville, OH 44683

of a Permit-to-Install 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:

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

The above named entity is hereby granted a Permit-to-Install for the 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 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



Authorization (continued)

Permit Number: P0106797
Permit Description: Chapter 31 modification of PTI #06-3362, issued 5/6/92, to increase allowable emissions due to replacement of the 12 million BTU/hr burner with a 17 million BTU/hr burner.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P909
Company Equipment ID:	Delacquer Furnace
Superseded Permit Number:	06-3362
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written 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. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.

- 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 state-only required 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 Ohio EPA DAPC, Southeast District Office. 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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 quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. Emissions units P909 contained in this permit is subject to 40 CFR Part 63, Subpart RRR. The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulation (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

C. Emissions Unit Terms and Conditions

1. P909, Delacquer Furnace

Operations, Property and/or Equipment Description:

Chapter 31 modification of existing 12.5 tons per hour natural gas-fired delacquering furnace controlled with an afterburner and vented to a fabric filter with lime injection to address increases in NO_x emissions resulting from replacement of the 12 million BTU/hr low-NO_x burner with a 17 million BTU/hr low-NO_x burner; supercedes PTI #06-3362 as modified on 5/6/92

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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.	ORC 3704.03(T)	The requirements of this rule are equivalent to the requirements of 40 CFR Part 63, Subpart RRR for particulate emissions (PE) and emissions of total hydrocarbon/volatile organic compounds (THC/VOC).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Nitrogen oxides (NO _x) emissions shall not exceed 0.74 lb/hr and 3.24 tpy. Carbon monoxide (CO) emissions shall not exceed 1.25 lbs/hr and 5.48 tpy. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-18-06(E)(2) and 40 CFR Part 63, Subpart RRR. See b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b. below.
d.	40 CFR Part 63, Subpart RRR (40 CFR 63.1500-1520) [In accordance with 40 CFR 63.1500(a) and (b)(3), this emissions unit is an existing delacquering kiln at a secondary aluminum production	The owner or operator of a scrap dryer/delacquering kiln/decoating kiln must not discharge or cause to be discharged to the atmosphere emissions in excess of: 0.20 lb of THC, as propane, per ton of

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	facility subject to the emissions limitations and control measures specified in this section.]	feed/charge; 0.30 lb of PM per ton of feed/charge; 7.0 x 10 ⁻⁵ gr of D/F TEQ per ton of feed/charge; and 1.50 lb of HCl per ton of feed/charge. [40 CFR 63.1505(d)(1)] See b)(2)c. below.
e.	40 CFR 63.1-19 (40 CFR 63.1518)	Appendix A to Subpart RRR of 40 CFR Part 63 – General Provisions Applicability to Subpart RRRR, specifies the provisions of Subpart A that apply to owners and operators of affected facilities subject to this subpart.
f.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.
g.	OAC rule 3745-17-11(B)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) and 40 CFR Part 63, Subpart RRR.
h.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO ₂) emissions shall not exceed 162.95 lbs/hr. See b)(2)d. below.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally–approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

[OAC rule 3745-31-05(A)(3), as effective 11/30/01]

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x and CO emissions from this air contaminant source since the uncontrolled potential to emit for NO_x and CO are less than 10 tons/yr.

[OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06]

- c. The owner or operator of a scrap dryer/ delacquering kiln/decoating kiln may choose to comply with the emission limits in 63.1505(e) as an alternative to the limits in 63.1505(d) if the scrap dryer/delacquering kiln/decoating kiln is equipped with an afterburner having a design residence time of at least 1 second and the afterburner is operated at a temperature of at least 750 degrees C (1400 degrees F) at all times.

[40 CFR 63.1505(e)]

- d. The actual SO₂ emissions are the result of the combustion of natural gas, and are negligible; therefore, no monitoring, record keeping, or reporting are required.

[OAC rule 3745-77-07(C)(1)]

c) Operational Restrictions

- (1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart RRR, including the following:

63.1506(b)	Labeling of each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln
63.1506(c)	Emission capture and collection; OM&M plan procedures
63.1506(d)	Measurement of feed charge weight
63.1506(g)	Afterburner and lime injected baghouse operating requirements
63.1506(p)	Corrective action for operating parameter deviations

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart RRR, including the following sections:

63.1510(a)	Monitoring of control equipment and processes after initial performance test required
63.1510(b)	Operation, maintenance, and monitoring (OM&M) plan requirements
63.1510(c)	Label inspections
63.1510(d)	Installation, operation, maintenance and inspections of capture/collection system
63.1510(e)	Installation, calibration, operation and maintenance of device to measure and record the total weight of feed/charge to, or the aluminum production from, the emission unit
63.1510(f)	Bag leak detection system requirements
63.1510(g)	Installation, calibration, maintenance, and operation of a device to continuously monitor and record the operating temperature of the afterburner
63.1510(h)	Installation, calibration, maintenance, and operation of a device to continuously monitor and record the temperature of the fabric filter inlet gases
63.1510(i)(1)	Verification that lime is free-flowing in continuous lime injection system
63.1510(i)(2)	Daily recording of the lime feeder setting for continuous lime injection system
63.1517(a)	Maintenance of files of all information (including all reports and notifications) required by the general provisions (40 CFR 63.10(b))
63.1517(b)	Additional general recordkeeping requirements for owner or operator of a new or existing affected source (including an emission unit in a secondary aluminum



	processing unit)
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e) Reporting Requirements

- (1) The permittee shall submit notifications and reports to the appropriate Ohio EPA District office as required pursuant to 40 CFR Part 63, Subpart RRR, per the following sections:

63.1515(a)	Initial notifications
63.1511(b) and 63.1515(b)	Notification of compliance status report after initial performance test
63.1516(a)	Startup, shutdown, and malfunction plan/reports
63.1516(b)	Semi-annual excess emissions/summary reports
63.1516(c)	Annual certifications of continuing compliance

f) Testing Requirements

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

- a. Emissions Limitations:
NOx emissions shall not exceed 0.74 lb/hr and 3.24 tpy.

Applicable Compliance Method:

Compliance with the lb/hr limitation shall be determined by multiplying the emission factor for natural gas combustion, from AP-42 Table 1.4-1 (7/98) of 50 lbs per million CF, by the maximum natural gas usage of 130 million CF/yr to obtain the hourly emission rate. The annual allowable was developed by multiplying the maximum hourly allowable NO_x emission rate (0.74 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs/ton.

[OAC rule 3745-31-05(A)(3), as effective 11/30/01]

- b. Emissions Limitations:
CO emissions shall not exceed 1.25 lbs/hr and 5.48 tpy.

Applicable Compliance Method:

Compliance shall be determined by multiplying the emission factor for natural gas combustion, from AP-42 Table 1.4-1 (7/98) of 84 lbs per million CF, by the

maximum natural gas usage of 130 million CF/yr to obtain the hourly emission rate. Compliance with the annual allowable is demonstrated by multiplying the maximum hourly allowable NO_x emission rate (0.74 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs/ton.

If required, CO emissions shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

[OAC rule 3745-31-05(A)(3), as effective 11/30/01]

c. Emissions Limitations:

The owner or operator of a scrap dryer/delacquering kiln/decoating kiln must not discharge or cause to be discharged to the atmosphere emissions in excess of:

0.20 lb of THC, as propane, per ton of feed/charge;
0.30 lb of PM per ton of feed/charge;
7.0 X 10⁻⁵ gr of D/F TEQ per ton) of feed/charge; and
1.50 lb of HCl per ton if feed/charge.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in f)(2).

[40 CFR 63.1505(d)(1)]

d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

[OAC rule 3745-17-07(A)]

e. Emission Limitation:

SO₂ emissions shall not exceed 162.95 lbs/hr.

Applicable Compliance Method:

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel. If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New

Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

[OAC rule 3745-18-06(E)(2)]

- (2) Performance testing shall be conducted as required in 40 CFR Part 63, Subpart RRR pursuant to 40 CFR 63.1511 and Subpart A of 40 CFR 63.7(c). 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 no later than the compliance date in 40 CFR 63.1501(a) and every five years following the initial performance test.

[40 CFR 63.1511(b) and 40 CFR 63.1511(e)]

- b. The emissions testing shall be conducted to demonstrate compliance with the emission limitations specified in b)(1)c. of this permit, and in accordance with the requirements of 40 CFR Part 63.1511.

[40 CFR 63.1511(b)]

- c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s):

For PM, Methods 1-5 of 40 CFR Part 60, Appendix A

For D/F, Methods 1-4 and 23 of 40 CFR Part 60, Appendix A

For THC, as propane, Methods 1-4 and 25A of 40 CFR Part 60, Appendix A

For HCl, Methods 1-4 and 26A of 40 CFR Part 60, Appendix A

Alternative test methods may be used subject to approval by the Administrator.

[40 CFR 63.1511(c) and (d)]

- d. The owner or operator must conduct each test while the affected source or emissions unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.

[40 CFR 63.1511(b)(1)]

- e. Each performance test for a continuous process must consist of 3 separate runs; pollutant sampling for each run must be conducted for the time period specified in the applicable method or, in the absence of a specific time period in the test method, for a minimum of 3 hours.

[40 CFR 63.1511(b)(2)]

- f. Each performance test for a batch process must consist of three separate runs; pollutant sampling for each run must be conducted over the entire process operating cycle.

[40 CFR 63.1511(b)(3)]

- g. Where multiple affected sources or emissions units are exhausted through a common stack, pollutant sampling for each run must be conducted over a period of time during which all affected sources or emissions units complete at least 1 entire process operating cycle or for 24 hours, whichever is shorter.

[40 CFR 63.1511(b)(4)]

- h. Initial compliance with an applicable emission limit or standard is demonstrated if the average of three runs conducted during the performance test is less than or equal to the applicable emission limit or standard.

[40 CFR 63.1511(b)(5)]

- i. The owner or operator of new or existing affected sources and emission units must establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR 63.1510 that ensures compliance with the applicable emission limit or standard. To establish the minimum or maximum value or range, the owner or operator must use the appropriate procedures in this section and submit the information required by 40 CFR 63.1515(b)(4) in the notification of compliance status report. The owner or operator may use existing data in addition to the results of performance tests to establish operating parameter values for compliance monitoring provided each of the following conditions are met to the satisfaction of the applicable permitting authority:

- i. The complete emission test report(s) used as the basis of the parameter(s) is submitted.
- ii. The same test methods and procedures as required by this subpart were used in the test.
- iii. The owner or operator certifies that no design or work practice changes have been made to the source, process, or emission control equipment since the time of the report.
- iv. All process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report.

[40 CFR 63.1511(g)]

- j. Prior to conducting a performance test required by this section, the owner or operator must prepare and submit a site-specific test plan meeting the requirements in 40 CFR 63.7(c). In addition, no later than thirty (30) days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. 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 Ohio

EPA, Southeast District Office's refusal to accept the results of the emissions test(s).

[40 CFR 63.1511(a)]

- k. The owner or operator must conduct performance tests to measure emissions of THC, D/F, HCl, and PM at the outlet of the control device. If the scrap dryer/delacquering kiln/decoating kiln is subject to the alternative emission limits in 40 CFR 63.1505(e), the average afterburner operating temperature in each 3-hour block period must be maintained at or above 760 degrees C (1400 degrees F) for the test. The owner or operator of a scrap dryer/delacquering kiln/decoating kiln subject to the alternative limits in 40 CFR 63.1505(e) must submit a written certification in the notification of compliance status report containing the information required by 40 CFR 63.1515(b)(7).

[40 CFR 63.1512(c)]

- l. The owner or operator of an affected source or emission unit, subject to an emission limit in a kg/Mg (lb/ton) of feed/charge format, must measure (or otherwise determine) and record the total weight of feed/charge to the affected source or emission unit for each of the three test runs and calculate and record the total weight. An owner or operator that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emission unit or affected source instead of the feed/charge weight.

[40 CFR 63.1512(k)]

- m. The owner or operator of a scrap dryer/delacquering kiln/decoating kiln or a group 1 furnace using a lime-injected fabric filter must use these procedures to establish an operating parameter value or range for the inlet gas temperature.
- i. Continuously measure and record the temperature at the inlet to the lime-injected fabric filter every 15 minutes during the HCl and D/F performance tests;
 - ii. Determine and record the 15-minute block average temperatures for the 3 test runs; and
 - iii. Determine and record the 3-hour block average of the recorded temperature measurements for the 3 test runs.

[40 CFR 63.1512(n)]

- n. The owner or operator of an affected source or emission unit using a lime-injected fabric filter system must use these procedures during the HCl and D/F tests to establish an operating parameter value for the feeder setting for each operating cycle or time period used in the performance test.
- i. For continuous lime injection systems, ensure that lime in the feed hopper or silo is free-flowing at all times; and

- ii. Record the feeder setting for the 3 test runs. If the feed rate setting varies during the runs, determine and record the average feed rate from the 3 runs.

[40 CFR 63.1512(p)]

- o. Use the following equation to determine compliance with an emission limit for THC:

$$E = \{C \times MW \times Q \times K_a \times K_b\} / \{M_v \times P \times 1,000,000\}$$

Where:

E = Emission rate of measured pollutant, kg/Mg (lb/ton) of feed;
 C = Measured volume fraction of pollutant, ppmv;
 MW = Molecular weight of measured pollutant, g/g-mole (lb/lb-mole): THC (as propane) = 44.11;
 Q = Volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);
 K_a = Conversion factor, 1 kg/1,000 g (1 lb/lb);
 K_b = Conversion factor, 1,000 L/m³ (1 ft³/ft³);
 M_v = Molar volume, 24.45 L/g-mole (385.3 ft³/lb-mole); and
 P = Production rate, Mg/hr (ton/hr).

[40 CFR 63.1513(a)]

- p. Use the following equation to determine compliance with an emission limit for PM, HCl, and D/F:

$$E = \{C \times Q \times K_a\} / \{P\}$$

Where:

E = Emission rate of PM, HCl, or D/F, kg/Mg (lb/ton) of feed;
 C = Concentration of PM, HCl, or D/F, g/dscm (gr/dscf);
 Q = Volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);
 K_a = Conversion factor, 1 kg/1,000 g (1 lb/7,000 gr); and
 P = Production rate, Mg/hr (ton/hr).

[40 CFR 63.1513(b)]

- q. Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure 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.

[OAC rule 3745-77-07(C)(1)]

- r. In addition to the Notice of Compliance Status Report required by 40 CFR 63.1511(b) and 63.1515(b), 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 Ohio EPA, Southeast District Office within 30 days following completion of test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.

[OAC rule 3745-77-07(C)(1)]

g) **Miscellaneous Requirements**

- (1) The permittee conducted the initial performance testing required by 40 CFR Part 63.1511 and f)(2) on September 30, 2009, and demonstrated compliance with the emission limitations specified in b)(1)c. of this permit when the unit was operating at a throughput rate of 8.1 tons per hour.