



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

8/24/2011

Mr. Christopher Hamm  
Global Scrap Management Inc.  
4340 Batavia Road  
Batavia, OH 45103

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1413000540  
Permit Number: P0108521  
Permit Type: Initial Installation  
County: Clermont

Certified Mail

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
Yes	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

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. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://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 Josh Mandel," 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

If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, [www.epa.ohio.gov/dapc](http://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: HCDOES





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Global Scrap Management Inc.**

Facility ID:	1413000540
Permit Number:	P0108521
Permit Type:	Initial Installation
Issued:	8/24/2011
Effective:	8/24/2011
Expiration:	8/24/2021





Division of Air Pollution Control
Permit-to-Install and Operate
for
Global Scrap Management Inc.

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## Authorization

Facility ID: 1413000540  
Application Number(s): A0042425  
Permit Number: P0108521  
Permit Description: Secondary Aluminum Group 1 Reverberatory Melting Furnace, natural-gas fired with 18 mmBtu/hour heat input and 4.5 TPH maximum melt capacity, equipped with a lime-injection fabric filter baghouse with bag leak detection system  
Permit Type: Initial Installation  
Permit Fee: \$750.00  
Issue Date: 8/24/2011  
Effective Date: 8/24/2011  
Expiration Date: 8/24/2021  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Global Scrap Management Inc.  
4340 Batavia Road  
Batavia, OH 45103

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

  
Scott J. Nally  
Director



## **Authorization (continued)**

Permit Number: P0108521

Permit Description: Secondary Aluminum Group 1 Reverberatory Melting Furnace, natural-gas fired with 18 mmBtu/hour heat input and 4.5 TPH maximum melt capacity, equipped with a lime-injection fabric filter baghouse with bag leak detection system

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

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	Smelting Furnace 1
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. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. 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<sup>1</sup> 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 emissions 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.

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile 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).

**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) B.2.
2. The following emissions units contained in this permit are subject to the area source requirements of 40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart RRR, Secondary Aluminum Production: P001. The complete NESHAP requirements, including the NESHAP General Provisions, may be accessed via the internet from the Electronic Code of Federal regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart RRR. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Appendix A of 40 CFR Part 63, Subpart RRR. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart RRR, and Subpart A.

## **C. Emissions Unit Terms and Conditions**



1. P001, Smelting Furnace 1

Operations, Property and/or Equipment Description:

Secondary Aluminum Group 1 Reverberatory Melting Furnace, natural-gas fired with 18 mmBtu/hour heat input and 4.5 TPH maximum melt capacity, equipped with a lime-injection fabric filter baghouse with bag leak detection system

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. b)(1)g., b)(1)h., b)(2)c., c)(2), d)(1), e)(1), f)(1)d., and f)(2).

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)  Best Available Technology (BAT)	Particulate emissions (PE) shall not exceed 0.015 grains per dry standard cubic feet (gr/dscf). [PE is assumed to be equivalent to PM <sub>10</sub> and PM <sub>2.5</sub> ]
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Nitrogen oxides (NOx) emissions shall not exceed 0.39 pound per ton of aluminum scrap processed and 7.7 tons per year (TPY)*.  Carbon monoxide (CO) emissions shall not exceed 0.33 pound per ton of aluminum scrap processed and 6.5 TPY*.  Volatile organic compound (VOC) emissions shall not exceed 0.20 pounds per ton of aluminum scrap processed and



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>3.94 TPY*.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.002 pound per ton of aluminum scrap processed and 0.05 TPY*.</p> <p>*The short-term and annual emission limitations outlined above are based upon the emissions unit's potential to emit. Therefore, no record keeping is required to demonstrate compliance with these limitations.</p> <p>See b)(2)a.</p>
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)b.
d.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(B)(1) (Table I)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to ORC 3704.03(T).
f.	OAC rule 3745-17-08(B)  Reasonably Available Control Measures (RACM)	Exempt. Facility is not located in an Appendix A area.
g.	<p>40 CFR Part 63, Subpart RRR [40 CFR 63.1500 – 63.1520]</p> <p>National Emission Standards for Hazardous Air Pollutants (HAPs) for Secondary Aluminum Production</p> <p>[In accordance with 40 CFR 63.2, this facility is an area source of HAPs. In accordance with 40 CFR 63.1503, this emissions unit is defined as a Group 1 furnace. In accordance with 40 CFR 63.1500, this emissions unit part of a secondary aluminum processing unit (SAPU), containing one or more Group 1 furnace units processing other than clean charge, that are</p>	<p>Dioxin and furan (D/F) emissions shall not exceed 15 micrograms (µg) of D/F toxicity equivalents (TEQ) per megagram (Mg) of feed per charge (or 2.1 x 10<sup>-4</sup> grains of D/F TEQ per ton of feed per charge). [40 CFR 63.1505(i)(3)]</p> <p>See b)(2)c., c)(2), d)(1), e)(1), f)(1)d., and f)(2).</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	affected sources subject to the emissions limitations and control measures specified in this section.]	
h.	40 CFR Part 63, Subpart A [40 CFR 63.1-15 and 40 CFR 63.1518]	Appendix A to Subpart RRR of 40 CFR Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply with some exceptions.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 revisions 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 limitations no longer apply.

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 State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO<sub>x</sub>, SO<sub>2</sub>, CO, and VOC emissions from this air contaminant source since the uncontrolled potential to emit for NO<sub>x</sub>, SO<sub>2</sub>, CO, and VOC is less than ten tons per year.

c. Emissions unit P001, as a single Group 1 furnace, is the only emissions unit within the SAPU at this facility. Pursuant to 40 CFR 63.1505(i)(6), the permittee may determine the emission standards by applying the Group 1 furnace limit specified in b)(1)g. above on the basis of the aluminum production weight in the Group 1 furnace, rather than on the basis of feed/charge.

c) Operational Restrictions

(1) The permittee shall fire only natural gas as fuel in this emissions unit.

(2) The permittee shall comply with the applicable operating requirements summarized in Table 2 of 40 CFR Part 63, Subpart RRR, including the following rule sections:



63.1506(b)	labeling of emissions unit in accordance with (b)(1) and (b)(2)
63.1506(c)	design and operation of capture/collection systems in accordance with (c)(1) through (c)(3)
63.1506(d)	measurement of feed/charge or production weights in accordance with (d)(1) through (d)(3)
63.1506(m)	operating requirements for lime-injected fabric filter control device (including bag leak detection system) in accordance with (m)(1), (m)(3), and (m)(4)
63.1506(p)	corrective action requirements

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and record keeping requirements summarized in Table 3 of 40 CFR Part 63, Subpart RRR, including the following rule sections:

63.1510(b)	operation, maintenance, and monitoring (OM&M) plan (including the information specified in (b)(1) through (b)(8))
63.1510(c)	labeling inspections
63.1510(d)	install, operate, and maintain capture/control systems including annual inspections
63.1510(e)	install, calibrate, operate, and maintain a device to monitor feed/charge or production weight (including the accuracy and calibration requirements specified in (e)(1) and (e)(2))
63.1510(f)	install, calibrate, maintain, and continuously operate a bag leak detection system in accordance with (f)(1)(i) through (f)(1)(x)

**Final Permit-to-Install and Operate**

Global Scrap Management Inc.

**Permit Number:** P0108521**Facility ID:** 1413000540**Effective Date:** 8/24/2011

63.1510(h)	install, calibrate, maintain, and operate a device to continuously monitor and record the temperature of the inlet gases to the lime-injected fabric filter in accordance with (h)(1) and (h)(2)
63.1510(i)	inspection and monitoring requirements for lime-injection system to fabric filter in accordance with (i)(1) through (i)(3)
63.1510(j)	monitoring requirements for total flux addition rate in accordance with (j)(1) through (j)(5)
63.1510(s)	site-specific requirements for OM&M plan
63.1510(u)	SAPU compliance demonstration via performance testing
63.1510(v)	application for approval of alternative lime injection monitoring methods
63.1510(w)	application for approval of alternative monitoring methods to demonstrate compliance with emission standards in accordance with the criteria in (w)(1) through (w)(6)
63.1517(a)	general record keeping and retention requirements
63.1517(b)(1)(i)	records for baghouse leak detection systems
63.1517(b)(3) through (b)(7)	record keeping requirements for lime-injected fabric filter, solid flux additions, each continuous monitoring system/device, and feed/charge (or throughput) weights
63.1517(b)(13) through (b)(16)	record keeping requirements for labeling inspections, emission capture/collection inspections, alternative approvals, plans and revisions

e) Reporting Requirements

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

63.1515(a)	initial notification requirements in accordance with (a)(1) through (a)(7)
63.1515(b)	notification of compliance status report including the information, as applicable, specified in (b)(1) through (b)(10), 63.1512(q), 63.1512(r), and 63.1512(s)
63.1516(a)	startup, shutdown, and malfunction plan and reporting
63.1516(b)	semi-annual excess emissions and deviation summary reports

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.015 grains/dscf.

Applicable Compliance Method:

The PE limitation above is based upon the US EPA AP-42 emission factor for reverberatory smelting with baghouse control of 1.3 pounds/ton of metal processed [ref. *Secondary Aluminum Operations*, Chapter 12.8, Table 12-8.2, dated 10/1986] and the design parameters (4.5 TPH melt capacity, stack flow rate, and temperature) for this emissions unit as provided in the application for

**Final Permit-to-Install and Operate**

Global Scrap Management Inc.

**Permit Number:** P0108521

**Facility ID:** 1413000540

**Effective Date:** 8/24/2011

PTIO number P0108521. The AP-42 emission factor has an "E" rating which may be of poor quality according to US EPA; therefore compliance with the PE limitation shall be demonstrated by the emission testing required in f)(2) below.

[PE is assumed to be equivalent to PM<sub>10</sub> and PM<sub>2.5</sub>]

b. Emission Limitations:

Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 0.39 pound per ton of aluminum scrap processed and 7.7 TPY.

Carbon monoxide (CO) emissions shall not exceed 0.33 pound per ton of aluminum scrap processed and 6.5 TPY.

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.002 pound per ton of aluminum scrap processed and 0.05 TPY.

Volatile organic compound (VOC) emissions shall not exceed 0.20 pounds per ton of aluminum scrap processed and 3.94 TPY.

Applicable Compliance Method:

The NO<sub>x</sub>, CO, SO<sub>2</sub>, and VOC emission limitations listed above represent the emissions unit's uncontrolled potential to emit. The NO<sub>x</sub>, CO, and SO<sub>2</sub> emission limitations were based upon the emission factors from AP-42 Fifth Edition, Natural Gas Combustion, Chapter 1.4, Tables 1.4-1 and 1.4-2, dated 7/1998, the maximum heat input of the furnace at 18 mmBtu per hour, and the maximum melt capacity of 4.5 TPH.

The VOC emission limitation was based upon the emission factor from the US EPA FIRE 6.25 database for SCC 3-04-001-03, the maximum heat input of the furnace at 18 mmBtu per hour, and the maximum melt capacity of 4.5 TPH.

If required, the permittee shall demonstrate compliance with the NO<sub>x</sub>, CO, SO<sub>2</sub>, and VOC emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and Methods 7, 10, 6, and 25, respectively.

c. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9.

d. Emission Limitation:

Dioxin and furan (D/F) emissions shall not exceed 15 µg of D/F TEQ per Mg of feed per charge (or  $2.1 \times 10^{-4}$  grains of D/F TEQ per ton of feed per charge).

Applicable Compliance Method:

The permittee shall comply with the applicable performance testing and compliance demonstration requirements of 40 CFR Part 63, Subpart RRR, per f)(2) below and the following rule sections:

63.1511(a)	site-specific test plan
63.1511(b)	initial performance test
63.1511(c)	performance test methods
63.1511(d)	alternative method approval
63.1511(e)	repeat performance testing
63.1511(g)	establish monitoring and operating parameters values during performance testing
63.1512(d)	Group 1 furnace performance test requirements
63.1512(k)	measurement of feed/charge or production weight during performance testing
63.1512(n)	measurement of baghouse inlet gas temperature during performance testing
63.1512(o)	measurement of solid flux additions during performance testing
63.1512(p)	measurement of lime injection additions during performance testing
63.1513(b)(2) and 63.1513(d)	D/F and TEQ equations and conversion for determining compliance

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 90 days after start-up.

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- b. The emission testing shall be conducted to demonstrate compliance with the allowable concentration of D/F TEQ in the exhaust stream specified in b)(1)g. and the allowable concentration of PE in the exhaust stream specified in b)(1)a.
- c. The emission testing for D/F TEQ shall be repeated every 5 years in accordance with 40 CFR Part 63, Subpart RRR.
- d. The following test method(s) shall be employed to demonstrate compliance with the allowable emission rate(s):
  - i. 40 CFR Part 60, Appendix A, Methods 1 through 4; and
  - ii. 40 CFR Part 60, Appendix A, Method 5 and the procedures specified in OAC rule 3745-17-03(B)(9) for PE; and
  - iii. 40 CFR Part 60, Appendix A, Method 23 for D/F.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- f. Not later than 60 days prior to the proposed test date(s), the permittee shall submit a site-specific test plan, pursuant to 40 CFR 63.1511(a), and an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).
- g. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
- h. 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 appropriate Ohio EPA District Office or local air agency within 30 days following

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completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

(1) None.