

6/6/2012

Certified Mail

Mr. Mike Chenoweth
Imperial Aluminum - Minerva, LLC
217 Roosevelt Ave.
Minerva, OH 44657

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0210000107
Permit Number: P0109612
Permit Type: Renewal
County: Carroll

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 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 Ohio EPA DAPC, Northeast District Office at (330)425-9171 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, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,


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

Cc: Ohio EPA-NEDO



Response to Comments

Facility ID:	0210000107
Facility Name:	Imperial Aluminum - Minerva, LLC
Facility Description:	Secondary Aluminum Foundry
Facility Address:	217 ROOSEVELT AVE Minerva, OH 44657 Carroll County
Permit:	P0109612, Permit-To-Install and Operate - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Free Press Standard on 05/03/2012. The comment period ended on 06/02/2012.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

- a. Comment: None
- b. Response: None



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Imperial Aluminum - Minerva, LLC**

Facility ID:	0210000107
Permit Number:	P0109612
Permit Type:	Renewal
Issued:	6/6/2012
Effective:	6/6/2012
Expiration:	6/20/2016



Division of Air Pollution Control
Permit-to-Install and Operate
for
Imperial Aluminum - Minerva, LLC

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Authorization

Facility ID: 0210000107
Application Number(s): A0043872
Permit Number: P0109612
Permit Description: PTIO Renewal permit for thermal chip dryer.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 6/6/2012
Effective Date: 6/6/2012
Expiration Date: 6/20/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Imperial Aluminum - Minerva, LLC
217 ROOSEVELT AVE
Minerva, OH 44657

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

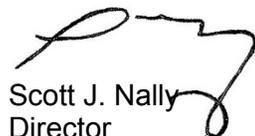
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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: P0109612

Permit Description: PTIO Renewal permit for thermal chip dryer.

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

Emissions Unit ID:	P009
Company Equipment ID:	Chip Dryer
Superseded Permit Number:	P0084266
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 Ohio EPA DAPC, Northeast District Office 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 submitting¹ 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.

¹Permittees 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) None.

C. Emissions Unit Terms and Conditions



1. P009, Chip Dryer

Operations, Property and/or Equipment Description:

Thermal Chip Dryer (max capacity of 5,000 lbs/hr, 6 mmBTU/hr, controlled by 8 mmBTU/hr afterburner and 99 percent efficient baghouse.)

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 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.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) from this emissions unit shall not exceed 3.10 pounds per hour and 13.60 tons per year. See b)(2)a. Carbon monoxide (CO) emissions resulting from natural gas combustion from the dryer and afterburner, combined, shall not exceed 1.10 pounds per hour and 4.90 tons per year. Organic compound (OC) emissions from this emissions unit shall not exceed 0.90 pound per hour and 3.80 tons per year. Nitrogen oxides (NO _x) emissions resulting from natural gas combustion from the

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>dryer and afterburner, combined, shall not exceed 0.70 pound per hour and 2.90 tons per year.</p> <p>Dioxin and furan (D/F) emissions from this emissions unit shall not exceed 3.50×10^{-5} grain per ton of material charged to the dryer and 5.50×10^{-8} ton per year.</p> <p>Visible particulate emissions from the baghouse stack shall not exceed 10% opacity as a 6-minute average.</p> <p>See b)(2)b and c)(1) through c)(7).</p>
b.	40 CFR Part 63, Subpart RRR	The emission limitations required by this applicable rule are equivalent to the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. This permit takes into account the use of a baghouse and afterburner system. Emissions from emissions unit P009 shall be vented to those control devices whenever this air contaminant source is in operation.
- b. The baghouse shall maintain PE at a minimum control efficiency of 99%, by weight.
- c. This emissions unit shall employ a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice". The permittee has conducted an evaluation of the capture and collection system for this dryer and modified the system accordingly.

- d. For the bag leak detection system, the permittee shall initiate corrective action within 1 hour of a bag leak detection system alarm. The fabric filter system shall be operated such that the bag leak detection system alarm does not sound more than 5 percent of the operating time during a 6-month block reporting period.

In calculating this operating time fraction, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time shall be counted. If corrective action is required, each alarm shall be counted as a minimum of 1 hour. If the permittee takes longer than 1 hour to initiate corrective action, the alarm time shall be counted as the actual amount of time taken by the permittee to initiate corrective action.

c) Operational Restrictions

- (1) The permittee shall ensure that the afterburner and fabric filter systems meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in Chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice." Dilution air may be added to the emissions streams for the purpose of controlling the temperature at the inlet to the fabric filter.
- (2) The permittee shall ensure that the afterburner and fabric filter are operated in accordance with the procedures and requirements in the facility's OM&M plan.
- (3) The permittee shall install and operate a device that records the weight of each charge to the thermal chip dryer, in accordance with the facility's OM&M plan.
- (4) The permittee shall maintain the afterburner operating average temperature for each 3-hour period at or above the average operating temperature established during the most recent performance test which demonstrated compliance with all applicable emission limits. The average operating temperature during emissions testing conducted on May 12 and 13, 2005, was 1400 degrees F.
- (5) The permittee shall operate this thermal chip dryer using only unpainted aluminum chips as the feedstock.
- (6) The permittee shall install, calibrate, operate and maintain a bag leak detection system for the exhaust from the fabric filter, as required in 40 CFR 63.1510(f)(1), or a continuous opacity monitoring system as required in 40 CFR 63.1510(f)(2).
- (7) Both the afterburner and fabric filter shall be in operation while this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in

accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The pressure drop across the fabric filter shall be maintained within the range of 2 to 12 inches of water while the emissions unit is in operation.

This range of the pressure drop across the baghouse shall be effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Northeast District Office of the Ohio EPA. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or

limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (2) The permittee shall inspect the baghouse monthly and record the following information:
 - a. the date and time of the inspection;
 - b. any portion of the cleaning system, conveying system or hoppers that was not operating properly; and
 - c. any corrective action(s) taken.
- (3) The permittee shall record the weight of each charge to the thermal chip dryer. Alternatively, the permittee may instead record the aluminum production weight from the emissions unit rather than the feed weight, provided that the provisions stated in 40 CFR 63.1506(d)(3)(i) and (ii) are met.

The accuracy of the weight measurement device or procedure must be plus or minus 1 percent of the weight being measured. The permittee shall verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.
- (4) The permittee shall record the type of material in each charge to the thermal chip dryer.
- (5) The permittee shall continuously monitor and record the operating temperature of the afterburner as follows:
 - a. the temperature monitoring device must be installed at the exit of the combustion zone of the afterburner;
 - b. 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;
 - c. 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); and
 - d. 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 Ohio EPA.
- (6) The permittee shall record a brief explanation of the cause for excursions when any 3-hour block period falls below the compliance operating parameter value.
- (7) The permittee shall conduct an inspection of the afterburner at least once a year and record the results. At a minimum, an inspection must include the following:
 - a. inspection of all burners, pilot assemblies, and pilot sensing devices for proper operation and clean pilot sensor
 - b. inspection for proper adjustment of combustion air;

- c. inspection of internal structure (e.g., baffles) to ensure structural integrity;
- d. inspection of dampers, fans, and blowers for proper operation;
- e. inspection for proper sealing;
- f. inspection of motors for proper operation;
- g. inspection of combustion chamber refractory lining and clean and replace lining as necessary;
- h. inspection of afterburner shell for corrosion and/or hot spots;
- i. documentation, for the burn cycle that follows the inspection, that the afterburner is operating properly and any necessary adjustments have been made; and
- j. verification that the equipment is maintained in good operating condition.

The permittee shall perform all necessary repairs following an inspection, in accordance with the requirements of the OM&M plan.

- (8) The permittee shall record the following information for the bag leak detection system:
 - a. the number of total operating hours for the thermal chip dryer during each 6 month reporting period;
 - b. records of each alarm;
 - c. the time of the alarm;
 - d. the time corrective action was initiated and completed; and
 - e. a brief description of the cause of the alarm and the corrective action(s) taken.
- (9) The permittee shall maintain daily records of the number of hours of operation for this emissions unit.
- (10) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.
- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (3) The permittee submitted a startup, shutdown and malfunction plan and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard on July 15, 2005. The permittee 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 event is not consistent with the procedure in the plan as described in 40 CFR 63.6(e)(3).
- (4) The permittee shall submit semiannual excursion reports to the Ohio EPA Northeast District Office within 60 days after the end of each 6-month period. The 6-month reporting periods shall be January 1 to June 30, and July 1 to December 31 of each calendar year. These reports shall report if any of the following conditions occurred during a 6-month period
 - a. the corrective action specified in the OM&M plan for a bag leak detection system alarm, or for a continuous opacity monitoring deviation, that was not initiated within 1 hour; and/
 - b. any excursion of an operational requirement, as listed in section (c) of this permit.
- (5) If no deviations of parameters have occurred during a 6 month period, the permittee must still submit a semiannual report stating that no excess emissions occurred during the reporting period. The permittee shall include in this report a certification of compliance with the applicable operational standard for charge materials as stated in 40 CFR 63.1516(f)(3). The applicable operational standard reads "The permittee shall operate this thermal chip dryer using only unpainted aluminum chips as the feedstock." Each certification must contain the statement provided in 40 CFR 63.1516(b)(2)(i) which reads, "Only unpainted aluminum chips were used as feedstock in the thermal chip dryer during this reporting period."

- (6) For the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the permittee must certify continuing compliance based upon, but not limited to, the following conditions:
- a. any period of excess emissions, as defined in 40 CFR 63.1516(b)(1), that occurred during the year were reported as required by this subpart;
 - b. all monitoring, record keeping, and reporting requirements were met during the year.
- 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:
PE from this emissions unit shall not exceed 3.10 pounds per hour.
Applicable Compliance Method:
If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.
 - b. Emission Limitation:
PE from this emissions unit shall not exceed 13.60 tons per year.
Applicable Compliance Method:
The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (3.10 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.
 - c. Emission Limitation:
CO emissions resulting from natural gas combustion from the dryer and afterburner, combined, shall not exceed 1.10 pounds per hour.
Applicable Compliance Method:
Compliance shall be demonstrated from results of the following equation:
$$E = [(D \times \text{scuft}/1.059 \text{ Btu} \times EF) + (A \times \text{scuft}/1.059 \text{ Btu} \times EF)]$$
where:

E = CO emissions rate, in pounds per hour;

D = maximum heating capacity of the emissions unit (P009) (reported as 6 mmBtu/hr);

A = maximum heating capacity of the afterburner (reported as 8 mmBtu/hr); and

EF = emissions factor for CO taken from AP-42, Table 1.4-1 (84.0 lb/mmsft).

d. Emission Limitation:

CO emissions resulting from natural gas combustion from the dryer and afterburner, combined, shall not exceed 4.90 tons per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable CO emission limitation (1.10 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

e. Emission Limitation:

OC emissions from this emissions unit shall not exceed 0.90 pound per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 18 or 25, as appropriate.

f. Emission Limitation:

OC emissions from this emissions unit shall not exceed 3.80 tons per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable OC emission limitation (0.90 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

g. Emission Limitation:

NO_x emissions resulting from natural gas combustion from the dryer and afterburner, combined, shall not exceed 0.70 pound per hour.

Applicable Compliance Method:

Compliance shall be demonstrated from results of the following equation:

$$E = [(D \times \text{scuft}/1.059 \text{ Btu} \times EF) + (A \times \text{scuft}/1.059 \text{ Btu} \times EF)]$$

where:

E = NO_x emissions rate, in pounds per hour;

D = maximum heating capacity of the emissions unit (P009) (reported as 6 mmBtu/hr), venting to the atmosphere;

A = maximum heating capacity of the afterburner (reported as 8 mmBtu/hr); and

EF = emissions factor for NO_x taken from AP-42, Table 1.4-1 (100.0 lb/mmsft).

h. Emission Limitation:

NO_x emissions resulting from natural gas combustion from the dryer and afterburner, combined, shall not exceed 2.90 tons per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable NO_x emission limitation (0.70 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

i. Emission Limitation:

D/F emissions from this emissions unit shall not exceed 3.50×10^{-5} grain per ton of material charged to the dryer.

Applicable Compliance Method:

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

j. Emission Limitation:

D/F emissions from this emissions unit shall not exceed 5.50×10^{-8} ton per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable D/F emission limitation (3.50×10^{-5} lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

k. Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 10% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated based upon visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

(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 to demonstrate compliance with the established emission limitations requirements specified at a minimum of once during the permit duration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for D/F.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

For D/F: Methods 1 through 4 and Method 23 of 40 CFR Part 60, Appendix A.

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

- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast 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 Northeast District Office's refusal to accept the results of the emission test(s).
- f. Personnel from the Ohio EPA Northeast 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.



- g. 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 Northeast District Office within 30 days following 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 Ohio EPA Northeast District Office.

g) Miscellaneous Requirements

- (1) None.