



Environmental Protection Agency

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

10/31/2012

Certified Mail

Mr. Elwood Hannold  
Aleris Rolled Products, Inc.  
7319 Newport Road SE  
Uhrichsville, OH 44683

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0679030152  
Permit Number: P0109624  
Permit Type: Administrative Modification  
County: Tuscarawas

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	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

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](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

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





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Aleris Rolled Products, Inc.**

Facility ID:	0679030152
Permit Number:	P0109624
Permit Type:	Administrative Modification
Issued:	10/31/2012
Effective:	10/31/2012





Division of Air Pollution Control
Permit-to-Install
for
Aleris Rolled Products, Inc.

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## Authorization

Facility ID:	0679030152
Facility Description:	Recycling plant and rolling mill
Application Number(s):	M0001581, M0001586, M0001835
Permit Number:	P0109624
Permit Description:	Administrative modification of PTI Nos. 06-3362 and 06-1583 to update the hourly and annual allowable particulate emission rates for EUs F001 and P017-P020 to reflect historic stack test data collected under "worst-case" conditions and to add applicable requirements that were not incorporated into the original PTIs
Permit Type:	Administrative Modification
Permit Fee:	\$2,500.00
Issue Date:	10/31/2012
Effective Date:	10/31/2012

This document constitutes issuance to:

Aleris Rolled Products, Inc.  
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.

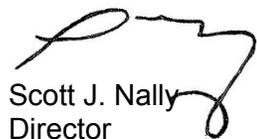
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0109624  
Permit Description: Administrative modification of PTI Nos. 06-3362 and 06-1583 to update the hourly and annual allowable particulate emission rates for EUs F001 and P017-P020 to reflect historic stack test data collected under "worst-case" conditions and to add applicable requirements that were not incorporated into the original PTIs

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

**Emissions Unit ID:** F001  
Company Equipment ID: Scrap Processing Line #1  
Superseded Permit Number: 06-3362  
General Permit Category and Type: Not Applicable

**Group Name: Melter #s 1 through 4**

<b>Emissions Unit ID:</b>	<b>P017</b>
Company Equipment ID:	Aluminum Melter #1
Superseded Permit Number:	06-1583
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P018</b>
Company Equipment ID:	Aluminum Melter #2
Superseded Permit Number:	06-1583
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P019</b>
Company Equipment ID:	Aluminum Melter #3
Superseded Permit Number:	06-1583
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P020</b>
Company Equipment ID:	Aluminum Melter #4
Superseded Permit Number:	06-1583
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, and (ii) any deviations from 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 permitteeshall

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 F001 and P017-P020 contained in this permit are 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. F001, Scrap Processing Line #1**

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

13.5 ton per hour MLC scrap processing line with a total enclosure controlled with a cyclone and a fabric filter equipped with a bag leak detection system; administrative modification of PTI No. 06-3362 modified on May 6, 1992, to correct the BAT limits on particulate and add applicable MACT Subpart RRR and OAC Chapter 17 requirements

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.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 1.08 pounds per hour and 4.73 tons per year.  The requirements of this rule include compliance with the requirements of 40 CFR Part 63, Subpart RRR and OAC rules 3745-17-07(A) and 3745-17-11(B).
b.	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.
c.	OAC rule 3745-17-11(B)	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.
d.	40 CFR Part 63, Subpart RRR (40 CFR 63.1500-1520)  [In accordance with 40 CFR 63.1500(a) and (b)(1), this emissions unit is an existing aluminum scrap	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). [40 CFR 63.1505(b)(1)]

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	shredder at a secondary aluminum production facility subject to the emissions limitations and control measures specified in this section.]	See b)(2)a. below.
e.	40 CFR 63.1-16 (40 CFR 63.1518)	Appendix A to Subpart RRR of 40 CFR Part 63 – General Provisions Applicability to Subpart RRR, specifies the provisions of Subpart A that apply to owners and operators of affected facilities subject to this subpart.

(2) Additional Terms and Conditions

- a. The owner or operator of an existing affected source must comply with the requirements of this subpart by March 24, 2003.

[40 CFR 63.1501(a)]

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(c)	Design requirements for capture/collection system and operation in accordance with OM&M plan procedures
63.1506(e)(1)	Initiate corrective action within one hour of a bag leak detection alarm and complete corrective action in accordance with OM&M plan procedures
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(d)	Installation, operation, maintenance and inspections of capture/collection system
63.1510(f)(1)	Bag leak detection system requirements
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)

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) 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:

63.1510(b)	Submittal of OM&M plan
63.1515(a)	Initial notifications
63.1511(b), 63.1512(q), 63.1512(s) 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 and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:  
PE shall not exceed 1.08 pounds per hour and 4.73 tons per year.

Applicable Compliance Method:

Compliance with the pound per hour emissions limitation shall be demonstrated based upon the testing requirements specified in f)(2).

Compliance with the annual emissions limitation shall be demonstrated based upon the following equation:

$$\begin{aligned} \text{PE (tons/yr)} &= (\text{lb/hr emissions limitation} \times 8,760 \text{ hrs/yr} \times 1 \text{ ton}/2,000 \text{ lbs}) \\ &= 1.08 \text{ lb/hr} \times 8,760 \text{ hrs/yr} \times 1 \text{ ton}/2,000 \text{ lbs} \\ &= 4.73 \text{ tons/yr} \end{aligned}$$

[OAC rule 3745-31-05(A)(3)]

- b. Emissions Limitations:  
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)]

(2) Performance testing shall be conducted as required in 40 CFR Part 63, Subpart RRR pursuant to 40 CFR 63.1511, 63.1512 and Subpart A of 40 CFR Part 63. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing to demonstrate compliance with the limits of 40 CFR Part 63, Subpart RRR shall be conducted no later than the date for compliance established in 40 CFR 63.1501(a) (see g)(1) below), 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)a. and d. of this permit, and in accordance with the requirements of 40 CFR Part 63.1511 and 63.1512.

[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  
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 rate achievable for the materials charged at the time of the test with charge materials representative of the range of materials processed by the unit.

[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) and OAC rule 3745-15-04]

- k. The owner or operator must conduct performance tests to measure PM emissions at the outlet of the control system.

[40 CFR 63.1512(a)]

- l. Use the following equation to determine compliance with an emission limit for PM:

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

Where:

E = Emission rate of PM, kg/Mg (lb/ton) of feed;  
C = Concentration of PM, g/dscm (gr/dscf);  
Q = Volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);  
Ka = 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)(1)]

- m. 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 3745-15-04]

- n. 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 60 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 3745-15-04]

g) **Miscellaneous Requirements**

- (1) The initial particulate emissions testing required by 40 CFR 63.1511(b) was conducted on September 30, 2009.

**2. Emissions Unit Group -Melter #s 1 through 4: P017, P018,P019 and P020**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P017	Aluminum Melter #1 - 20 ton per hour, 50 million BTU/hour group 1 aluminum reverberatory melting furnace utilizing only clean charge and limited reactive chlorine flux and low-NO <sub>x</sub> burners; administrative modification of PTI No. 06-1583 modified on July 17, 1991, to correct the BAT limits and add applicable MACT Subpart RRR and OAC Chapter 17 requirements
P018	Aluminum Melter #2 - 20 ton per hour, 50 million BTU/hour group 1 aluminum reverberatory melting furnace utilizing only clean charge and limited reactive chlorine flux and low-NO <sub>x</sub> burners; administrative modification of PTI No. 06-1583 modified on July 17, 1991, to correct the BAT limits and add applicable MACT Subpart RRR and OAC Chapter 17 requirements
P019	Aluminum Melter #3 - 20 ton per hour, 50 million BTU/hour group 1 aluminum reverberatory melting furnace utilizing only clean charge and limited reactive chlorine flux and low-NO <sub>x</sub> burners; administrative modification of PTI No. 06-1583 modified on July 17, 1991, to correct the BAT limits and add applicable MACT Subpart RRR and OAC Chapter 17 requirements
P020	Aluminum Melter #4 - 20 ton per hour, 50 million BTU/hour group 1 aluminum reverberatory melting furnace utilizing only clean charge and limited reactive chlorine flux and low-NO <sub>x</sub> burners; administrative modification of PTI No. 06-1583 modified on July 17, 1991, to correct the BAT limits and add applicable MACT Subpart RRR and OAC Chapter 17 requirements

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.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 6.20 pounds per hour.  Nitrogen oxides (NO <sub>x</sub> ) emissions shall not exceed 0.94 pound per hour.  Carbon monoxide (CO) emissions shall not exceed 0.50 pound per hour.  Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.03 pound per hour.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Volatile organic compound (VOC) emissions shall not exceed 0.27 pound per hour.</p> <p>The requirements of this rule include compliance with the requirements of 40 CFR Part 63, Subpart RRR.</p> <p>See b)(2)a. below.</p>
b.	OAC rule 3745-17-11(B)	See b)(2)b. below.
c.	OAC rule 3745-17-07(A)	See b)(2)c. below.
d.	<p>40 CFR Part 63, Subpart RRR (40 CFR 63.1500-1520)</p> <p>[In accordance with 40 CFR 63.1500(a) and (b)(8), this emissions unit is an existing group 1 furnace without add-on controls and processing only clean charge at a secondary aluminum production facility subject to the emissions limitations and control measures specified in this section.]</p>	<p>The owner or operator of a group 1 furnace must use the limits in this paragraph to determine the emission standards for a SAPU.</p> <p>0.20 kg of HCl per Mg (0.40 lb of HCl per ton) of feed/charge. [40 CFR 63.1505(i)]</p> <p>The particulate matter (PM) emission limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>See b)(2)d. and e. below.</p>
e.	40 CFR 63.1-16 (40 CFR 63.1518)	Appendix A to Subpart RRR of 40 CFR Part 63 – General Provisions Applicability to Subpart RRR, specifies the provisions of Subpart A that apply to owners and operators of affected facilities subject to this subpart.

(2) Additional Terms and Conditions

- a. Emissions from EUs P017, P018, P019 and P020, combined, shall not exceed the following emissions limitations:
  - i. 22.82 tons per year of PE;
  - ii. 8.23 tons per year of NO<sub>x</sub> emissions;
  - iii. 4.38 tons per year of CO emissions;
  - iv. 0.53 tons per year of SO<sub>2</sub> emissions; and

v. 4.73 tons per year of VOC emissions.

b. The uncontrolled mass rate of emissions (UMRE) for particulate matter from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II does not apply to this emissions unit.

[OAC rule 3745-17-11]

c. Since the mass emission limitation for particulate in OAC rule 3745-17-11(B)(2) is not applicable, the opacity limits in OAC rule 3745-17-07 are also not applicable pursuant to OAC rule 3745-17-07(A)(3)(h).

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

d. The owner or operator of an existing affected source must comply with the requirements of this subpart by March 24, 2003.

[40 CFR 63.1501(a)]

e. The owner or operator of a SAPU at a secondary aluminum production facility that is a major source may demonstrate compliance with the emission limits of paragraph (i) of this section by demonstrating that each emission unit within the SAPU is in compliance with the applicable emission limits of paragraphs (i) of this section.

[40 CFR 63.1505(k)(4)]

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
63.1506(d)	Measurement of feed charge weight or aluminum production weight
63.1506(n)(1)	Maintain total reactive chlorine flux injection rate at or below average rate established during performance test
63.1506(n)(2)	Operate in accordance with the work practice/pollution prevention measures in the OM&M Plan
63.1506(n)(3)	Operate using only clean charge as feedstock
63.1506(p)	Corrective action for operating parameter deviations

- (2) The permittee shall burn only natural gas in this emissions unit.
- (3) The maximum amount of runaround scrap (as defined in 40 CFR 63.1503) processed in EUs P017-P020, combined, shall not exceed 30 percent by weight of the total aluminum processed per calendar year.

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(b)	Operation, maintenance, and monitoring (OM&M) plan requirements
63.1510(c)	Label inspections
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(j)	Monitoring and recordkeeping of reactive flux injection rate
63.1510(o)	Develop site specific monitoring plan
63.1510(p)	Scrap inspection program (if included in the site specific monitoring program)
63.1510(q)	Scrap contaminant monitoring and recordkeeping program using a calculation method (if included in the site specific monitoring program)
63.1510(u)	Individual emissions unit compliance demonstration
63.1510(w)	Application to administrator for alternative monitoring methods (optional)
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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- (2) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (3) The permittee shall maintain daily records of the amount of runaround scrap (as defined in 40 CFR 63.1503) processed in EUs P017-P020, combined, in tons and in percent by weight of the total aluminum processed.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) 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:

63.1510(b)	Submittal of OM&M plan
63.1510(o) and 63.1512(e)	Submittal of site specific monitoring plan
63.1515(a)	Initial notifications
63.1511(b), 63.1512(r) 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

- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (4) The permittee shall submit annual deviation (excursion) reports that identify each calendar year when the feed rate of runaround scrap (as defined in 40 CFR 63.1503) to EUs P017-P020, combined, exceeds 30% by weight of the total aluminum processed. Each report shall be submitted by January 31<sup>st</sup> of each year and shall cover the previous calendar year.

f) Testing Requirements

(1) Compliance with the emissions limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:  
PE shall not exceed 6.20 pounds per hour.

Applicable Compliance Method:  
Compliance with the emissions limitation shall be demonstrated based upon the testing requirements specified in f)(2).

[OAC rule 3745-31-05(A)(3)]

- b. Emissions Limitation:  
NO<sub>x</sub> emissions shall not exceed 0.94 pound per hour.

Applicable Compliance Method:  
Compliance with the emissions limitation shall be based upon the emissions factor of 0.047 lbNO<sub>x</sub>/ton of aluminum processed provided in the permittee's application based on the results of the stack testing of Melter #1 on November 20, 1990, multiplied by the maximum production rate of 20 tons per hour.

If required, NO<sub>x</sub> emissions shall be determined according to test Methods 1 - 4, and 7 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)]

- c. Emissions Limitation:  
CO emissions shall not exceed 0.50 pound per hour.

Applicable Compliance Method:  
Compliance with the emissions limitation shall be based upon the emissions factor of 0.025 lbCO per ton of aluminum processed provided in the permittee's application based on the results of the stack testing of Melter #1 on November 20, 1990, multiplied by the maximum production rate of 20 tons per hour.

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)]

- d. Emissions Limitation:  
SO<sub>2</sub> emissions shall not exceed 0.03 pound per hour.

Applicable Compliance Method:

Compliance with the emissions limitation shall be based upon the following calculation and the SO<sub>2</sub> emissions factor from AP-42 Table 1.4-2 (7/98) of 0.6 lb/million cf:

$$\begin{aligned} \text{SO}_2 \text{ (lb/hr)} &= \text{emissions factor for SO}_2 \text{ (lb/million cf) X maximum fuel} \\ &\quad \text{input rating (million BTU/hr) X 1 scf/1,020 BTU} \\ &= 0.60\text{lb/million BTU X 50 million BTU/hr X 1 scf/1,020 BTU} \\ &= 0.03 \text{ lb/hr} \end{aligned}$$

If required, SO<sub>2</sub> 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 3745-31-05(A)(3)]

e. Emissions Limitation:

VOC emissions shall not exceed 0.27 pound per hour.

Applicable Compliance Method:

Compliance with the emissions limitation shall be based upon the following calculation and the VOC emissions factor from AP-42 Table 1.4-2 (7/98) of 5.5 lb/million cf:

$$\begin{aligned} \text{VOC (lb/hr)} &= \text{emissions factor for VOC (lb/million cf) X maximum fuel} \\ &\quad \text{input rating (million BTU/hr) X 1 scf/1,020 million BTU} \\ &= 5.5 \text{ lbs/million cf X 50 million BTU/hr X 1 scf/1,020 million} \\ &\quad \text{BTU} \\ &= 0.27 \text{ lb/hr} \end{aligned}$$

If required, VOC emissions shall be determined according to test Methods 1 - 4 and 18, 25, or 25A 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)]

f. Emissions 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)]

- g. Emissions Limitation:  
 The owner or operator of a group 1 furnace must use the limits in this paragraph to determine the emission standards for a SAPU:

0.20 kg of HCl per Mg (0.40 lb of HCl per ton) of feed/charge

Applicable Compliance Method:

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

[40 CFR 63.1505(i)]

- h. Emissions Limitations:  
 Emissions from EUs P017, P018, P019 and P020, combined, shall not exceed the following emissions limitations:

- i. 22.82 tons per year of PE;
- ii. 8.23 tons per year of NO<sub>x</sub> emissions;
- iii. 4.38 tons per year of CO emissions;
- iv. 0.53 tons per year of SO<sub>2</sub> emissions; and
- v. 4.73 tons per year of VOC emissions.

Applicable Compliance Methods:

Compliance with the annual emissions limitations for EUs P017-P020, combined, shall be demonstrated by the following calculations:

$$\text{PE (tons/yr)} = [(\text{PE emissions factor for processing of runaround scrap (as defined in 40 CFR 63.1503) in lb/ton}) \times \text{annual runaround scrap processed in EUs P017-P020, combined (tons/yr)}] + (\text{PE emissions factor for natural gas usage (lb/million cf)} \times \text{annual natural gas usage in EUs P017-P020, combined (million cf/yr)}) \times 1 \text{ ton}/2,000 \text{ pounds}$$

Where:

$$0.31 \text{ lb/ton} = \text{PE emissions factor for runaround scrap processing from 10/10 stack test of EU P018)}$$

$$7.6 \text{ lb/million cf} = \text{PE emissions factor for natural gas usage (AP-42 Table 1.4-2 (7/98))}$$

$$\text{NO}_x \text{ (tons/yr)} = \text{NO}_x \text{ emissions factor (lb/ton)} \times \text{annual aluminum processed in EUs P017-P020, combined (tons/yr)} \times 1 \text{ ton}/2,000 \text{ pounds}$$

Where:

$$0.047 \text{ lb/ton} = \text{NO}_x \text{ emissions factor from 11/90 stack test of EUP017}$$

$$\text{CO (tons/yr)} = \text{CO emissions factor (lb/ton)} \times \text{annual aluminum processed in EUs P017-P020, combined (tons/yr)} \times 1 \text{ ton}/2,000 \text{ pounds}$$

Where:  
0.025 lb/ton = CO emissions factor from 11/90 stack test of EU P017

$$\begin{aligned} \text{SO}_2 \text{ (tons/yr)} &= \text{SO}_2 \text{ emissions factor (lb/million cf) from AP-42 Table 1.4-2 (7/98)} \times \text{maximum annual fuel usage (million BTU/yr)} \times 1 \text{ cf}/1,020 \text{ BTU} \times 1 \text{ ton}/2,000 \text{ lbs} \\ &= 0.60 \text{ lb SO}_2/\text{million cf} \times 1,752,000 \text{ million BTU/yr} \times 1 \text{ cf}/1,020 \text{ BTU} \times 1 \text{ ton}/2,000 \text{ lbs} \\ &= 0.53 \text{ tons/yr} \end{aligned}$$

$$\begin{aligned} \text{VOC (tons/yr)} &= \text{VOC emissions factor (lb/million cf) from AP-42 Table 1.4-2 (7/98)} \times \text{maximum annual fuel usage (million BTU/yr)} \times 1 \text{ cf}/1,020 \text{ BTU} \times 1 \text{ ton}/2,000 \text{ lbs} \\ &= 5.5 \text{ lb VOC/million cf} \times 1,752,000 \text{ million BTU/yr} \times 1 \text{ cf}/1,020 \text{ BTU} \times 1 \text{ ton}/2,000 \text{ lbs} \\ &= 4.73 \text{ tons/yr} \end{aligned}$$

[OAC rule 3745-31-05(A)(3)]

(2) Performance testing shall be conducted as required in 40 CFR Part 63, Subpart RRR pursuant to 40 CFR 63.1511, 63.1512 and Subpart A of 40 CFR Part 63. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. Except as provided in f)(2)l. below, the emission testing to demonstrate compliance with the limits of 40 CFR Part 63, Subpart RRR shall be conducted no later than the date for compliance established in 40 CFR 63.1501(a) and every five years following the initial performance test. See g)(1) below.

[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)d. of this permit, and in accordance with the requirements of 40 CFR Part 63.1511 and 63.1512.

[40 CFR 63.1511(d)]

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 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 melt rate achievable for the materials charged at the time of the test 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) and OAC rule 3745-15-04]

- k. The owner or operator of a group 1 furnace without add-on air pollution control devices and processing only clean charge must conduct performance tests to measure emissions of PM and HCl at the furnace exhaust outlet. A D/F test is not required.

[40 CFR 63.1512(e)(2)]

- l. The owner or operator may choose to determine the rate at which reactive chlorine flux is added to a group 1 furnace and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all chlorine in the reactive flux added to the group 1 furnace is emitted. Under these circumstances, the owner or operator is not required to conduct an emission test for HCl.

[40 CFR 63.1512(e)(3)]

- m. 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)]

- n. The owner or operator must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.
- i. Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15 minute period during the HCl tests, determine and record the 15-minute block average weights, and calculate and record the total weight of the gaseous or liquid reactive flux for the 3 test runs;
  - ii. Record the identity, composition, and total weight of each addition of solid reactive flux for the 3 test runs;
  - iii. Determine the total reactive chlorine flux injection rate by adding the recorded measurement of the total weight of chlorine in the gaseous or liquid reactive flux injected and the total weight of chlorine in the solid reactive flux using Equation 5.
  - iv. Divide the weight of total chlorine usage ( $W_t$ ) for the 3 test runs by the recorded measurement of the total weight of feed for the 3 test runs; and
  - v. If a solid reactive flux other than magnesium chloride is used, the owner or operator must derive the appropriate proportion factor subject to approval by the applicable permitting authority.

[40 CFR 63.1512(o)]

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

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

Where:

E = Emission rate of PM or HCl, kg/Mg (lb/ton) of feed;  
C = Concentration of PM or HCl, g/dscm (gr/dscf);  
Q = Volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);  
Ka = 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)(1)]

- p. 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 3745-15-04]

- q. 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 60 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 3745-15-04]

g) Miscellaneous Requirements

- (1) The initial emissions testing required by 40 CFR 63.1511(b) demonstrating compliance with the particulate matter (PM) and HCl limits in 40 CFR 63.1505(i) was conducted on October 13, 2010.