



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

September 2, 1998

CERTIFIED MAIL

Re: Modification to Permit to Install No. 15-1309
Stark County

Albex Aluminum, Inc
4416 Louisville Road
Canton, OH 44705

Attention: Stanley M Platek

Enclosed please find a modification to the Ohio EPA Permit to Install referenced above which will modify the terms and conditions.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Review Appeals Commission at the following address: Environmental Review Appeals Commission, 236 East Town Street, Room 300, Columbus, Ohio 43215.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

Enclosure

cc: US EPA
CANTON AIR POLLUTION CONTROL



Permit to Install Terms and Conditions

Issuance Date: September 2, 1998
Effective Date: September 2, 1998
Modification Fee: \$400.00

OHIO ENVIRONMENTAL PROTECTION AGENCY

MODIFICATION TO PERMIT TO INSTALL

Name of Applicant: Albex Aluminum, Inc
Address: 4416 Louisville Road
City: Plain Township, OH

The Ohio EPA has received a request for a modification for the Ohio EPA Permit to Install referenced above.

The Permit to Install issued to **Albex Aluminum, Inc, Permit to Install No. 15-1309** is modified in the following manner:

Terms and Conditions on pages 4 thru 9 of Permit to Install issued on **September 10, 1997**.

The reason for the modification is: **to increase allowable emissions, of PTI No. 15-1309, issued September 10, 1997.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

Ohio Environmental Protection Agency



Director

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for ALBEX ALUMINUM, INC located in Stark County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P006	18,000 lbs/hr Aluminum scrap rotary dryer with fabric filter and thermal incinerator	Thermal incinerator and fabric filter	3745-17-07 including but not limited to 3745-17-07 (A) (1) [6-14-91] 3745-17-11 including but not limited to 3745-17-11 (B) (2) [6-14-91] 3745-21-07 including but not limited to 3745-21-07 (G) (2) [10-31-96] 3745-31-05 [4-12-96] BAT	BAT is more stringent BAT is more stringent BAT is more stringent Visible emissions limit (see Section A.6 of Additional Special Terms and Conditions) 5 lbs PM/hr 21.9 tons PM/yr 11.4 lbs OC/hr 49.93 tons OC/yr 0.361 lb CO/hr 1.58 tons CO/yr 1.0 lb NO _x /hr 4.4 tons NO _x /yr

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	21.9
OC	49.93
CO	1.58
NO _x	4.40

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Canton Air Pollution Control, 420 Market Ave. N., Canton, Ohio 44702-1544.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Canton Air Pollution Control, 420 Market Ave. N., Canton, Ohio 44702-1544.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions

1. 100 percent of the emissions from this emissions unit shall be vented to a fabric filter and a thermal incinerator in series. This thermal incinerator shall have a destruction efficiency of 90 percent or better for organic compounds.
2. This fabric filter shall have to be efficient enough to reduce particulate matter emissions to less than or equal to 5 pounds/hour.
3. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent test that demonstrated the emissions unit was in compliance.
4. The pressure drop across the fabric filter shall be maintained within the range of TBD inches of water while the emissions unit is in operation. This range shall be established based on the pressure drop readings done during the most recent test that demonstrated the emissions unit was in compliance.

5. The material charged to this emissions unit shall be adequately screened so that there are no emissions of air toxics. An air toxic is defined as any compound with a threshold limit value (TLV).
6. The opacity of the visible emissions from the stack servicing this emissions unit shall not exceed 10 percent opacity for a three minute average.

B. Monitoring and/or Recordkeeping Requirement

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and,
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, operating manual(s). The permittee shall record the pressure drop across the fabric filter on a daily basis.
 3. The permittee shall maintain monthly records of the amount of aluminum scrap processed in this emissions unit.

C. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range specified above.

D. Compliance Methods and Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. the emission testing shall be conducted within 3 months after start-up of this emissions unit;
 - b. the emission testing shall be conducted to demonstrate compliance with the VOC emission limit of 11.4 pounds/hour and of the PM emission limit of 5 pounds/hour;
 - c. the following test method(s) shall be employed to demonstrate compliance:

VOC Method 25 (>50 PPM) or 25A (<50 PPM) from 40 CFR Part 60, Appendix A
PM Method 5 from 40 CFR Part 60, Appendix A; and,
 - d. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division. Maximum capacity shall be defined as a minimum of 18,000 pounds scrap/hour and the scrap shall represent the type of scrap with the maximum contaminants that will be processed by this emissions unit; and,
 - e. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and the outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-09 or the approved test protocol (e.g.) the mass balance protocol approved on October 25, 1995.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Canton Local Air Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Canton Local Air Agency's refusal to accept the results of the emission test(s).

Personnel from the Canton Local Air Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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 Canton Local Air Agency within 30 days following completion of the test(s).

2. Compliance with the emission limitation(s) in the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitation

5 pounds PM/hour and 21.9 tons PM/year

Applicable Compliance Method

Emissions testing Method 5

b. Emission Limitation

11.4 pounds VOC/hour and 49.93 tons VOC/year

Applicable Compliance Method

Emissions testing using Method 25 (>50 PPM) or 25A (<50 PPM)

c. Emission Limitation

Visible Emissions Limit Section A.6

Applicable Compliance Method

Visible emission readings using Method 9

d. Emission Limitation

1 pound NO_x/hour and 4.4 tons NO_x/year

Applicable Compliance Method

AP-42 Table 1.5-2

e. Emission Limitation

0.361 pound CO/hour and 1.58 tons CO/year

Applicable Compliance Method

AP-42 Table 1.5-2

E. **Miscellaneous Requirements**

None.