State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: FINAL PERMIT TO INSTALL
CARROLL COUNTY
Application No: 02-18164

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
RRR	**MACT**
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 11/28/2003

M and M Drying and Melting, LLC
Percy Kanga
217 Roosevelt Ave
Minerva, OH 44657

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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 within thirty (30) days after the notice of the Directors 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 Commission. 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, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **NEDO**

FINAL PERMIT TO INSTALL 02-18164

Application Number: 02-18164

APS Premise Number: 0210000107

Permit Fee: **$500**

Name of Facility: M and M Drying and Melting, LLC

Person to Contact: Percy Kanga

Address: 217 Roosevelt Ave
Minerva, OH 44657

Location of proposed air contaminant source(s) [emissions unit(s)]:
217 Roosevelt Ave
Minerva, Ohio

Description of proposed emissions unit(s):
Thermal chip dryer with afterburner and baghouse.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. 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:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.

iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

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.

6. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, 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, reopening 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.

7. 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 this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. 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.

b. 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:

i. 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.

ii. 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.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. 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.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. 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.

10. Permit To Operate Application

a. If 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 <u>obtained before</u> 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).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is

granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. 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 appropriate Ohio EPA District Office or local air agency.

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 appropriate Ohio EPA District Office or local air agency. 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., 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.)

3. Permit Transfers

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

6. 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.

7. 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).

8. 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.

9. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
D/F	5.5×10^{-8}
PE	13.6
OC	3.8
CO	4.9
NOx	2.9

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P009 - Thermal Chip Dryer (max capacity of 5,000 lbs/hr, 6 mmBtu/hr, natural gas fired) controlled by 8 mmBtu/hr Afterburner and 95 percent efficient Baghouse	OAC rule 3745-31-05(A)(3)	Dioxins and furans (D/F) emissions shall not exceed 3.5 x 10^{-5} grains per ton of charge to the dryer, and 5.5 x 10^{-8} ton per year. See also Section A.1.2.b below. Particulate emissions (PE) shall not exceed 3.1 pounds per hour and 13.6 tons per year. See Section A.1.2.a below. Organic Compound (OC) emissions shall not exceed 0.9 pound per hour and 3.8 tons per year. Carbon monoxide (CO) emissions from natural gas combustion from both the dryer and afterburner combined shall not exceed 1.1 pounds per hour and 4.9 tons per year. Nitrogen oxides (NOx) emissions from natural gas combustion from both the dryer and afterburner combined shall not exceed 0.7 pound per hour and 2.9 tons per year.
	40 CFR Part 63, Subpart RRR	Visible particulate emissions (VE) shall not exceed 10% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-07(A)	The requirements of this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3).

		The requirements of this rule are less stringent than the visible particulate emission limit established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The particulate emissions from this emissions unit will be controlled by a fabric filter dust collector. The fabric filter has a maximum stack exhaust flow rate of 30,000 scfm. The listed particulate limits of 3.1 lbs/hr and 13.6 tons/year are based upon a calculated mass emission rate from said fabric filter stack at a stack gas outlet grain load of no greater than 0.015 grains per dry standard cubic feet.

2.b M&M Drying, LTD is currently an area source of hazardous air pollutants (HAPs). 40 CFR 63.1500(c) states that the requirements of Subpart RRR pertaining to dioxin and furan emissions and the associated operating, monitoring, reporting and recordkeeping requirements apply to affected sources, including each new and existing thermal chip dryer, located at a secondary aluminum production facility that is an area source of HAPs as defined in 40 CFR 63.2. However, should M&M Drying, LTD become a major source of HAPs in the future, the permittee shall be subject to the requirements pertaining to total hydrocarbon emissions (THC), as propane.

2.c The permittee is required by 40 CFR 63.1510(b) to prepare and implement for each new or existing affected source and emission unit, a written operation, maintenance, and monitoring (OM&M) plan. Any subsequent changes to the plan, as result of the addition of this emissions unit, must be submitted to the Ohio EPA, Northeast District Office, for review and approval. The required contents of an OM&M plan are specified in 40 CFR 63.1510(b).

II. 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 performance test which demonstrated compliance with all applicable emission limits.

5. The permittee shall operate this thermal chip dryer using only unpainted aluminum chips as the feedstock.

6. The pressure drop across the fabric filter shall be maintained within the range of 2 to 7 inches of water while the emissions unit is in operation.

7. 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 paragraph (f)(2) of the same section.

8. Both the afterburner and fabric filter shall be in operation while this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. 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 $\pm$ 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.

2. The permittee shall record the type of material in each charge to the thermal chip dryer.

3. 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.

4. 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.

5. 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.

6. The permittee shall record the following:

   a. If a bag leak detection system is used, the number of total operating hours for the thermal chip dryer during each 6 month reporting period, records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken.

   b. If a continuous opacity monitoring system is used, records of opacity measurement data, including records where the average opacity of any 6-minute period exceeds 5 percent, with a brief explanation of the cause of the emissions, the time the emissions occurred, the time corrective action was initiated and completed, and the corrective action taken.

7. 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, and operating manual(s). The permittee shall record the pressure drop across the fabric filter on a weekly basis.

8. The permittee shall maintain daily records of the number of hours of operation for this emissions unit.

IV. Reporting Requirements

1. 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,

   b. any excursion of an operational requirement, as listed in section A.II of this permit.

2. 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 is listed in section A.II.5 of this permit and 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."

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:

   a. Within 180 days of start-up of operations, emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rates for dioxins/furans using Methods 1 through 4, found in 40 CFR Part 60 Appendix A, and the Method for the pollutant, as described below.

   b. The emission 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.

      This emissions unit shall only process unpainted aluminum chips.

   c. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and

approval prior to the tests may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission tests.

d. 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.

e. 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 submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

f. During the testing, the permittee shall establish the operating parameter value or range for the afterburner serving this emissions unit. The temperature monitoring device must be installed at the exit of the combustion zone of the afterburner. The permittee shall continuously measure and record the operating temperature of the afterburner every 15 minutes during the D/F performance tests. The permittee shall determine and record the 15-minute block average temperatures, and determine and record the 3-hour block average temperature measurements, for the three test runs.

2. Emission Limitation:
Dioxins/Furans: 3.5×10^{-5} grains/ton of feed or charge to the dryer

Applicable Compliance Method:
The permittee shall conduct, or have conducted, D/F emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate in accordance with 40 CFR Part 60, Appendix A, Method 23 within 180 days of start-up of operation.

3. Emission Limitation:
Dioxins/Furans: 5.5×10^{-8} ton/year

Applicable Compliance Method:
Compliance with the annual emission limit shall be determined by multiplying the number of hours of annual operation by the hourly emission rate determined by the D/F emission test and dividing by 2,000 lbs/ton.

4. Emission Limitation:
Particulates: 3.1 lbs/hour

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limit in accordance with 40 CFR Part 60, Appendix A, Method 5.

5. Emission Limitation:

Particulates: 13.6 tons/year

Applicable Compliance Method:
Compliance with the annual emission limit shall be determined by multiplying the number of hours of annual operation by the hourly emission rate and dividing by 2,000 lbs/ton.

6. Emission Limitation:
Organic Compounds: 0.9 lb/hour

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 25 or 25A.

7. Emission Limitation:
Organic Compounds: 3.8 tons/year

Applicable Compliance Method:
Compliance with the annual emission limit shall be determined by multiplying the number of hours of annual operation by the hourly emission rate and dividing by 2,000 lbs/ton.

8. Emission Limitation:
Carbon monoxide (CO): 1.1 lbs/hour from natural gas combustion from both the dryer and afterburner combined.

Applicable Compliance Method:
To determine the hourly CO emission rate, the following equation shall be used:

$$E = (D \times sft^3/1{,}059 \text{ Btu} \times EF) + (A \times sft^3/1{,}059 \text{ Btu} \times EF)$$

where:
E = CO emission rate, in pounds per hour
D = Maximum heating capacity of P009 (reported as 6 mmBtu/hr)
A = Maximum heating capacity of after burner (reported as 8 mmBtu/hr)
EF = Emission Factor for CO taken from AP-42 Table 1.4-1 is 84.0 lbs/mmsft^3

9. Emission Limitation:
Carbon monoxide (CO): 4.9 tons/year from natural gas combustion from both the dryer and afterburner combined.

Applicable Compliance Method:
Compliance with the annual emission limit shall be determined by multiplying the number of hours of annual operation by the hourly CO emission rate and dividing by 2,000 lbs/ton.

10. Emission Limitation:
Nitrogen oxides (NOx): 0.7 lb/hour from natural gas combustion from both the dryer and afterburner combined.

Applicable Compliance Method:
To determine the hourly NOx emission rate, the following equation shall be used:

$$E = (D \times sft^3/1{,}059 \text{ Btu} \times EF) + (A \times sft^3/1{,}059 \text{ Btu} \times EF)$$

where:

E	=	NOx emission rate, in pounds per hour
D	=	Maximum heating capacity of P009 (reported as 6 mmBtu/hr)
A	=	Maximum heating capacity of after burner (reported as 8 mmBtu/hr)
EF	=	Emission Factor for NOx taken from AP-42 Table 1.4-1 is 50.0 lbs/mmsft^3

11. Emission Limitation:
Nitrogen oxides (NOx): 2.9 tons/year from natural gas combustion from both the dryer and afterburner combined.

Applicable Compliance Method:
Compliance with the annual emission limit shall be determined by multiplying the number of hours of annual operation by the hourly NOx emission rate and dividing by 2,000 lbs/ton.

12. Emission Limitation:
Visible Emissions: Visible particulate emissions shall not exceed 10 percent opacity, as a 6-minute average.

Applicable Compliance Method:
Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P009 - Thermal Chip Dryer (max capacity of 5,000 lbs/hr, 6 mmBtu/hr, natural gas fired) controlled by 8 mmBtu/hr Afterburner and 99 percent efficient Baghouse	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None