

Facility ID: 0656000014 Issuance type: Title V Draft Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

1. None

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### b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

P042 - aluminum ingot scalper;  
G001 - gasoline dispensing facility;  
Z005 - 10 Safety Kleen parts washers;  
Z006 - 24-inch grinder;  
Z007 - 36-inch grinder;  
Z008 - 60-inch grinder;  
Z009 - 6-ton grinder;  
Z010 - roll shop lathe;  
Z011 - lathes, grinders, milling machines;  
Z013 - acid baths/hoods;  
Z014 - 6.6 mmBtu/hr space heaters;  
Z015 - 4.9 mmBtu/hr aging oven;  
Z016 - 72-inch slitter;  
Z017 - 48-inch slitter; and  
Z018 - 36-inch slitter.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0656000014 Emissions Unit ID: B001 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
25.25 mmBtu/hr Surface Combustion preheat furnace - ingot preheater #7	OAC rule 3745-17-11	none
	OAC rule 3745-17-07	See A.I.2.a below.
		none
		See A.I.2.b below.

**2. Additional Terms and Conditions**

- a. The uncontrolled mass rate of particulate emissions 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 of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**Facility ID: 0656000014 Emissions Unit ID: B001 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

- 1. None

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0656000014 Emissions Unit ID: B002 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
25.25 mmBtu/hr Surface Combustion preheat furnace - ingot preheater #8	OAC rule 3745-17-11	none
	OAC rule 3745-17-07	See A.I.2.a below. none
		See A.I.2.b below.

2. **Additional Terms and Conditions**

- a. The uncontrolled mass rate of particulate emissions 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 of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0656000014 Emissions Unit ID: B002 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0656000014 Emissions Unit ID: B003 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
25.25 mmBtu/hr Surface Combustion preheat furnace - ingot preheater #9	OAC rule 3745-17-11	none
	OAC rule 3745-17-07	See A.I.2.a below. none
		See A.I.2.b below.

**2. Additional Terms and Conditions**

- a. The uncontrolled mass rate of particulate emissions 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 of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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Facility ID: 0656000014 Emissions Unit ID: B003 Issuance type: Title V Draft Permit

#### B. State Enforceable Section

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.

#### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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#### 2. Additional Terms and Conditions

1. None

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#### II. Operational Restrictions

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#### III. Monitoring and/or Record Keeping Requirements

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#### IV. Reporting Requirements

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#### V. Testing Requirements

1. None

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#### VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0656000014 Emissions Unit ID: B016 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
16.2 mmBtu/hr natural gas-fired batch anneal furnace #1	OAC rule 3745-17-10(B)(1)  OAC rule 3745-17-07(A)	Particulate emissions from this emissions unit shall not exceed 0.020 pound per mmBtu of actual heat input.  Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The permittee shall burn only natural gas as fuel in this emissions unit.

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**III. Monitoring and/or Record Keeping Requirements**

1. 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.

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**IV. Reporting Requirements**

1. 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.

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**V. Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated by dividing the applicable AP-42, 5th Edition (supplement B) emission factor for filterable particulate matter from table 1.4-2 (dated 7/98) (for units between 10 and 100 million Btu/hr) by the assumed heat content of natural gas (1000 Btu/cubic foot):

1.9 pounds of particulate emissions per million cubic feet / 1000 Btu/cubic foot = 0.0019 pound of particulate emissions per mmBtu

Emission tests also may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission 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). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0656000014 Emissions Unit ID: B016 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0656000014 Emissions Unit ID: B017 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
16.2 mmBtu/hr natural gas-fired batch anneal furnace #2	OAC rule 3745-17-10(B)(1)  OAC rule 3745-17-07(A)	Particulate emissions from this emissions unit shall not exceed 0.020 pound per mmBtu of actual heat input.  Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. **Additional Terms and Conditions**
  - (a) None

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**II. Operational Restrictions**

1. The permittee shall burn only natural gas as fuel in this emissions unit.

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**III. Monitoring and/or Record Keeping Requirements**

1. 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.

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**IV. Reporting Requirements**

1. 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.

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**V. Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
  - 0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated by dividing the applicable AP-42, 5th Edition (supplement B) emission factor for filterable particulate matter from table 1.4-2 (dated 7/98) (for units between 10 and 100 million Btu/hr) by the assumed heat content of natural gas (1000 Btu/cubic foot):

1.9 pounds of particulate emissions per million cubic feet / 1000 Btu/cubic foot = 0.0019 pound of particulate emissions per mmBtu

Emission tests also may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission 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). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0656000014 Emissions Unit ID: B017 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None

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**Facility ID: 0656000014 Issuance type: Title V Draft Permit**

**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 0656000014 Emissions Unit ID: B018 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
13.1 mmBtu/hr natural gas-fired coil anneal pit furnace #1	OAC rule 3745-17-10(B)(1)  OAC rule 3745-17-07(A)	Particulate emissions from this emissions unit shall not exceed 0.020 pound per mmBtu of actual heat input.  Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. **Additional Terms and Conditions**
  - (a) None

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**II. Operational Restrictions**

1. The permittee shall burn only natural gas as fuel in this emissions unit.

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**III. Monitoring and/or Record Keeping Requirements**

1. 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.

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**IV. Reporting Requirements**

1. 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.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated by dividing the applicable AP-42, 5th Edition (supplement B) emission factor for filterable particulate matter from table 1.4-2 (dated 7/98) (for units between 10 and 100 million Btu/hr) by the assumed heat content of natural gas (1000 Btu/cubic foot):

1.9 pounds of particulate emissions per million cubic feet / 1000 Btu/cubic foot = 0.0019 pound of particulate emissions per mmBtu

Emission tests also may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
  - b. Emission Limitation:
 

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission 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). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: B018 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 0656000014 Emissions Unit ID: B019 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
13.1 mmBtu/hr natural gas-fired coil anneal pit furnace #2	OAC rule 3745-17-10(B)(1)  OAC rule 3745-17-07(A)	Particulate emissions from this emissions unit shall not exceed 0.020 pound per mmBtu of actual heat input.  Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

- 1. The permittee shall burn only natural gas as fuel in this emissions unit.

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III. **Monitoring and/or Record Keeping Requirements**

1. 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.

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IV. **Reporting Requirements**

1. 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.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated by dividing the applicable AP-42, 5th Edition (supplement B) emission factor for filterable particulate matter from table 1.4-2 (dated 7/98) (for units between 10 and 100 million Btu/hr) by the assumed heat content of natural gas (1000 Btu/cubic foot):

1.9 pounds of particulate emissions per million cubic feet / 1000 Btu/cubic foot = 0.0019 pound of particulate emissions per mmBtu

Emission tests also may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission 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). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: B019 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: B020 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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13.1 mmBtu/hr natural gas-fired coil anneal pit furnace #3	OAC rule 3745-17-10(B)(1)	Particulate emissions from this emissions unit shall not exceed 0.020 pound per mmBtu of actual heat input.
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OAC rule 3745-17-07(A)

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

1. The permittee shall burn only natural gas as fuel in this emissions unit.

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III. **Monitoring and/or Record Keeping Requirements**

1. 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.

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IV. **Reporting Requirements**

1. 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.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated by dividing the applicable AP-42, 5th Edition (supplement B) emission factor for filterable particulate matter from table 1.4-2 (dated 7/98) (for units between 10 and 100 million Btu/hr) by the assumed heat content of natural gas (1000 Btu/cubic foot):

1.9 pounds of particulate emissions per million cubic feet / 1000 Btu/cubic foot = 0.0019 pound of particulate emissions per mmBtu

Emission tests also may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission 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). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: B020 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

1. None

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. None

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: B021 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
13.1 mmBtu/hr natural gas-fired coil anneal pit furnace #4	OAC rule 3745-17-10(B)(1)  OAC rule 3745-17-07(A)	Particulate emissions from this emissions unit shall not exceed 0.020 pound per mmBtu of actual heat input. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The permittee shall burn only natural gas as fuel in this emissions unit.

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**III. Monitoring and/or Record Keeping Requirements**

1. 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.

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**IV. Reporting Requirements**

1. 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.

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**V. Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated by dividing the applicable AP-42, 5th Edition (supplement B) emission factor for filterable particulate matter from table 1.4-2 (dated 7/98) (for units between 10 and 100 million Btu/hr) by the assumed heat content of natural gas (1000 Btu/cubic foot):

1.9 pounds of particulate emissions per million cubic feet / 1000 Btu/cubic foot = 0.0019 pound of particulate emissions per mmBtu

Emission tests also may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission 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). No visible emission testing is specifically required to demonstrate compliance with this limit but, if

appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: B021 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0656000014 Emissions Unit ID: B025 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
13.1 mmBtu/hr natural gas-fired coil anneal pit furnace #5	OAC rule 3745-17-10(B)(1)  OAC rule 3745-17-07(A)	Particulate emissions from this emissions unit shall not exceed 0.020 pound per mmBtu of actual heat input.  Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The permittee shall burn only natural gas as fuel in this emissions unit.

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**III. Monitoring and/or Record Keeping Requirements**

1. 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.

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**IV. Reporting Requirements**

1. 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.

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**V. Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:

**a. Emission Limitation:**

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated by dividing the applicable AP-42, 5th Edition (supplement B) emission factor for filterable particulate matter from table 1.4-2 (dated 7/98) (for units between 10 and 100 million Btu/hr) by the assumed heat content of natural gas (1000 Btu/cubic foot):

1.9 pounds of particulate emissions per million cubic feet / 1000 Btu/cubic foot = 0.0019 pound of particulate emissions per mmBtu

Emission tests also may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission 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). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: B025 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0656000014 Emissions Unit ID: B027 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
12.7 mmBtu/hr natural gas-fired WTLL wash and rinse tank heaters	OAC rule 3745-17-10(B)(1)	Particulate emissions from this emissions unit shall not exceed 0.020 pound per mmBtu of actual heat input.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

1. The permittee shall burn only natural gas as fuel in this emissions unit.

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III. **Monitoring and/or Record Keeping Requirements**

1. 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.

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IV. **Reporting Requirements**

1. 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.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated by dividing the applicable AP-42, 5th Edition (supplement B) emission factor for filterable particulate matter from table 1.4-2 (dated 7/98) (for units between 10 and 100 million Btu/hr) by the assumed heat content of natural gas (1000 Btu/cubic foot):

1.9 pounds of particulate emissions per million cubic feet / 1000 Btu/cubic foot = 0.0019 pound of particulate emissions per mmBtu

Emission tests also may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
  - b. Emission Limitation:
 

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission 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). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 0656000014 Emissions Unit ID: B027 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0656000014 Emissions Unit ID: B028 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
17.6 mmBtu/hr natural gas-fired coil anneal pit furnace #5	OAC rule 3745-31-05 (PTI 17-068) OAC rule 3745-17-10(B)(1) OAC rule 3745-17-07(A)	See A.II.1 below. Particulate emissions from this emissions unit shall not exceed 0.020 pound per mmBtu of actual heat input. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

- 1. The permittee shall burn only natural gas as fuel in this emissions unit.
- 2. The permittee shall burn no more than 95,589,120 cubic feet of natural gas in this emissions unit per calendar year.

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III. **Monitoring and/or Record Keeping Requirements**

1. 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.
2. The permittee shall maintain monthly records of the following information:
  - a. the natural gas usage, in cubic feet; and
  - b. the cumulative natural gas usage for each calendar year.

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IV. **Reporting Requirements**

1. 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.
2. The permittee shall also submit annual reports which specify the amount of natural gas used in this emissions unit during the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated by dividing the applicable AP-42, 5th Edition (supplement B) emission factor for filterable particulate matter from table 1.4-2 (dated 7/98) (for units between 10 and 100 million Btu/hr) by the assumed heat content of natural gas (1000 Btu/cubic foot):

$$1.9 \text{ pounds of particulate emissions per million cubic feet} / 1000 \text{ Btu/cubic foot} = 0.0019 \text{ pound of particulate emissions per mmBtu}$$

Emission tests also may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
  - b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission 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). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 0656000014 Emissions Unit ID: B028 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

- 1. None

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**Facility ID: 0656000014 Emissions Unit ID: B029 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
17.6 mmBtu/hr natural gas-fired coil anneal pit furnace #6	OAC rule 3745-31-05 (PTI 17-068) OAC rule 3745-17-10(B)(1)  OAC rule 3745-17-07(A)	See A.II.1 below.  Particulate emissions from this emissions unit shall not exceed 0.020 pound per mmBtu of actual heat input. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
<b>2. Additional Terms and Conditions</b>		
(a) None		

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**II. Operational Restrictions**

1. The permittee shall burn only natural gas as fuel in this emissions unit.
2. The permittee shall burn no more than 95,589,120 cubic feet of natural gas in this emissions unit per calendar year.

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**III. Monitoring and/or Record Keeping Requirements**

1. 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.
2. The permittee shall maintain monthly records of the following information:
  - a. the natural gas usage, in cubic feet; and
  - b. the cumulative natural gas usage for each calendar year.

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**IV. Reporting Requirements**

1. 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.
2. The permittee shall also submit annual reports which specify the amount of natural gas used in this emissions unit during the previous calendar year. These reports shall be submitted by January 31 of each year.

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**V. Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated by dividing the applicable AP-42, 5th Edition (supplement B) emission factor for filterable particulate matter from table 1.4-2 (dated 7/98) (for units between 10 and 100 million Btu/hr) by the assumed heat content of natural gas (1000 Btu/cubic foot):

1.9 pounds of particulate emissions per million cubic feet / 1000 Btu/cubic foot = 0.0019 pound of particulate emissions per mmBtu

Emission tests also may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
  - b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission 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). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: B029 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: B030 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
17.6 mmBtu/hr natural gas-fired coil anneal pit furnace #7	OAC rule 3745-31-05 (PTI 17-068) OAC rule 3745-17-10(B)(1) OAC rule 3745-17-07(A)	See A.II.1 below.  Particulate emissions from this emissions unit shall not exceed 0.020 pound per mmBtu of actual heat input. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

- 1. The permittee shall burn only natural gas as fuel in this emissions unit.
- 2. The permittee shall burn no more than 95,589,120 cubic feet of natural gas in this emissions unit per calendar year.

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III. Monitoring and/or Record Keeping Requirements

- 1. 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.
- 2. The permittee shall maintain monthly records of the following information:
  - a. the natural gas usage, in cubic feet; and
  - b. the cumulative natural gas usage for each calendar year.

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IV. Reporting Requirements

- 1. 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.
- 2. The permittee shall also submit annual reports which specify the amount of natural gas used in this emissions unit during the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated by dividing the applicable AP-42, 5th Edition (supplement B) emission factor for filterable particulate matter from table 1.4-2 (dated 7/98) (for units between 10 and 100 million Btu/hr) by the assumed heat content of natural gas (1000 Btu/cubic foot):

1.9 pounds of particulate emissions per million cubic feet / 1000 Btu/cubic foot = 0.0019 pound of particulate emissions per mmBtu

Emission tests also may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
  - b. Emission Limitation:
 

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission 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). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 0656000014 Emissions Unit ID: B030 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0656000014 Emissions Unit ID: F001 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paved roadways and parking areas (see section A.2.a)	OAC rule 3745-17-07(B)(4)	no visible particulate emissions except for 6 minutes during any 60-minute period
	OAC rule 3745-17-08(B), (B)(8), (B)(9)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.c, A.2.d, and A.2.f through A.2.j)
unpaved roadways and parking areas (see section A.2.b)	OAC rule 3745-17-07(B)(5)	no visible particulate emissions except for 13 minutes during any 60-minute period
	OAC rule 3745-17-08(B), (B)(2)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.e through A.2.j)

2. **Additional Terms and Conditions**

- a. The paved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

- (a) paved roadways:
  - entrance roads
  - north plant roads
  - east plant roads
  - south plant roads
  - west plant roads

paved parking areas:

administration building number 1  
 mod building  
 administration building number 2  
 main employee lot

- b. The unpaved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:
- unpaved roadways:
- construction entrance to trucking company on west side  
 process water plant road
- unpaved parking areas:
- CO2 plant lot
- c. The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by sweeping and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The permittee shall employ reasonably available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved shoulders of all paved roadways with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- g. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- h. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- i. pen-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- j. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadways and parking areas in accordance with the following frequencies:
  - paved roadways and parking areas minimum inspection frequency
  - all daily
  - unpaved roadways and parking areas minimum inspection frequency
  - all daily
2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in section A.III.4.d shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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**IV. Reporting Requirements**

1. The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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**V. Testing Requirements**

1. Compliance with the emission limitation for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: F001 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

1. None

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. None

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: F002 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
aluminum dross handling (cooling, dumping, storage, and load out)	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B)	Visible emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.b through A.2.d)

2. **Additional Terms and Conditions**

- a. The material handling operation(s) that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:
  - (a) aluminum dross handling (cooling, dumping, storage, and load out)
- b. The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:
 

material handling operation(s):

aluminum dross handling

control measures:

keep the dross sheltered to keep it dry; load out only cool, dry dross; minimize the drop height when handling; and tarp all transporting trucks

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. For each material handling operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measures is unnecessary.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:
 

material handling operation(s) minimum inspection frequency

aluminum dross handling daily
2. The above-mentioned inspections shall be performed during representative, normal operating conditions.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented.

The information in section A.III.4.d shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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**IV. Reporting Requirements**

- 1. The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency; and
  - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.
- 2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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**V. Testing Requirements**

- 1. Compliance with the visible emission limitation for the material handling operation(s) identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

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**VI. Miscellaneous Requirements**

- 1. None

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**Facility ID: 0656000014 Issuance type: Title V Draft Permit**

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**Facility ID: 0656000014 Emissions Unit ID: F002 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

- 1. None

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**II. Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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**Facility ID: 0656000014 Issuance type: Title V Draft Permit**

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**Facility ID: 0656000014 Emissions Unit ID: P006 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired melt and hold furnace #6 - group 1 furnace with no controls	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	This emissions unit is limited to 16.6 pounds of particulate emissions per hour.
	OAC rule 3745-18-06(E)(2)	Sulfur dioxide emissions shall not exceed 121.2 pounds per hour.
	40 CFR Part 63, Subpart RRR	Upon the effective date of 40 CFR Part 63, Subpart RRR, this emissions unit is limited to the following in accordance with 40 CFR 63.1505(i):  0.40 pound of particulates per ton of feed/charge from a group 1 furnace, that is not a melting/holding furnace processing only clean charge;  2.1 x 10 <sup>-4</sup> gr of D/F TEQ (see A.I.2.a) per ton of feed/charge from a group 1 furnace, (this limit does not apply if the furnace processes only clean charge); and  0.40 pound of hydrogen chloride (HCl) per ton of feed/charge.

## 2. Additional Terms and Conditions

- a. D/F means dioxins and furans. Dioxins and furans means tetra-, penta-, hexa-, and octachlorinated dibenzo dioxins and furans. TEQ means the international method of expressing toxicity equivalents for dioxins and furans as defined in "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update" (EPA-625/3-89-016), available from the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, Virginia 22161, NTIS no. PB 90-145756.

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### II. Operational Restrictions

1. [40 CFR 63.1506(n)]  
The permittee of a group 1 furnace (including a group 1 furnace that is part of a secondary aluminum processing unit) without add-on air pollution control devices must:
  - a. Maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test.
  - b. Operate each furnace in accordance with the work practice/pollution prevention measures documented in the OM&M plan and within the parameter values or ranges established in the OM&M plan.
  - c. Operate each group 1 melting/holding furnace subject to the emission standards in 40 CFR 63.1505(i)(2) using only clean charge as the feedstock.
2. [40 CFR 63.1506(b)]  
By March 24, 2003, the permittee must provide and maintain easily visible labels posted at each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln that identifies the applicable emission limits and means of compliance, including:
  - a. The type of affected source or emission unit (e.g., scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, in-line fluxer).
  - b. The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the operation, maintenance, and monitoring (OM&M) plan.
3. [40 CFR 63.1506(p)]  
When a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the performance test and incorporated in the OM&M plan, the permittee must initiate corrective action. Corrective action must restore operation of the affected source or emissions unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.
4. [40 CFR 63.1511(g)]  
By March 24, 2003, the permittee of the new or existing affected sources and emissions 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 permittee 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 permittee 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:
  - a. the complete emission test report(s) used as the basis of the parameter(s) is submitted;
  - b. the same test methods and procedures as required by this subpart were used in the test;
  - c. the permittee 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; and
  - d. all process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report.

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### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

2. [40 CFR 63.1510(b)]  
 The permittee must prepare and implement for each new or existing affected source and emissions unit, a written OM&M plan. By March 24, 2003, the permittee must submit the plan to the Ohio EPA, Southeast District Office for review and approval as part of the application for a part 70 or part 71 permit. Any subsequent changes to the plan must be submitted to the Ohio EPA, Southeast District Office for review and approval. Pending approval by the Ohio EPA, Southeast District Office of an initial or amended plan, the owner or operator must comply with the provisions of the submitted plan. Each plan must contain the following information:
- a. Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
  - b. A monitoring schedule for each affected source and emissions unit.
  - c. Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR 63.1505.
  - d. Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
    - i. calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and
    - ii. procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in Subpart A of 40 CFR Part 63.
  - e. Procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
  - f. Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in this section, including:
    - i. procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and
    - ii. procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
  - g. A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
  - h. Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in 40 CFR 63.1510(o) for each group 1 furnace not equipped with an add-on air pollution control device.
3. [40 CFR 63.1510(s)]  
 The permittee of a secondary aluminum processing unit at a facility must include, within the OM&M plan prepared in accordance with 40 CFR 63.1510(b), the following information:
- a. the identification of each emissions unit in the secondary aluminum processing unit;
  - b. the specific control technology or pollution prevention measure to be used for each emissions unit in the secondary aluminum processing unit and the date of its installation or application;
  - c. the emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;
  - d. information and data demonstrating compliance for each emissions unit with all applicable design, equipment, work practice or operational standards of this subpart; and
  - e. the monitoring requirements applicable to each emissions unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average (3-day, 24-hour rolling average means daily calculations of the average 24-hour emission rate over the 3 most recent consecutive 24-hour periods) using the procedure in 40 CFR 63.1510(t).
4. The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:
- a. any averaging among emissions of differing pollutants;
  - b. the inclusion of any affected sources other than emissions units in a secondary aluminum processing unit;
  - c. the inclusion of any emissions unit while it is shut down; or
  - d. the inclusion of any periods of startup, shutdown, or malfunction in emission calculations.
- To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the permittee must submit a request to the Ohio EPA, Southeast District Office containing the information required by paragraph (a) of this section and obtain approval of the Ohio EPA, Southeast District Office prior to implementing any revisions.
5. [40 CFR 63.1510(c)]  
 The permittee must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.
6. [40 CFR 63.1510(j)]  
 By March 24, 2003, the permittee must:
- a. Install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emissions unit.
  - i. The monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.
  - ii. The accuracy of the weight measurement device must be plus or minus 1% of the weight of the reactive

component of the flux being measured. The permittee may apply to the permitting authority for permission to use a weight measurement device of alternative accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of plus or minus 1% impracticable. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards.

- iii. The permittee must 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.
  - b. Calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - c. Record, for each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of:
    - i. gaseous or liquid reactive flux other than chlorine; and
    - ii. solid reactive flux.
  - d. Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - e. The permittee of a group 1 furnace or in-line fluxer performing reactive fluxing may apply to the Administrator for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis.
7. [40 CFR 63.1506(d)]  
By March 24, 2003, the permittee of each affected source or emissions unit subject to an emission limit in lb/ton of feed/charge must:
- a. Except as provided in paragraph (3) of this section, install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test.
  - b. Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
  - c. The permittee may choose to measure and record aluminum production weight from an affected source or emissions unit rather than feed/charge weight to an affected source or emissions unit, provided that:
    - i. the aluminum production weight, rather than feed/charge weight is measured and recorded for all emissions units within a SAPU; and
    - ii. all calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.
8. [40 CFR 63.1510(e)]  
By March 24, 2003, the permittee of an affected source or emissions unit subject to an emission limit in kg/Mg (lb/ton) or g/Mg (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emissions unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emissions unit-by-emissions unit basis. As an alternative to a measurement device, the permittee may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emissions unit.
- a. The accuracy of the weight measurement device or procedure must be plus or minus 1 percent of the weight being measured. The permittee may apply to the Ohio EPA, Southeast District Office for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standard.
  - b. The permittee must 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.
9. [40 CFR 63.1512(k)]  
During the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the permittee of an affected source or emissions 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 emissions unit for each of the three test runs and calculate and record the total weight. A permittee that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emissions unit or affected source instead of the feed/charge weight.
10. [40 CFR 63.1512(o)]  
The permittee must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.
- a. Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15-minute period during the HCl and D/F 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.
  - b. Record the identity, composition, and total weight of each addition of solid reactive flux for the 3 test runs.

- c. 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 the following equation:

$$Wt = (F1)(W1) + (F2)(W2)$$

where:

Wt = total chlorine usage, by weight;  
 F1 = fraction of gaseous or liquid flux that is chlorine;  
 W1 = weight of reactive flux gas or liquid injected;  
 F2 = fraction of solid reactive chloride flux that is chlorine (e.g., F = 0.75 for magnesium chloride); and  
 W2 = weight of solid reactive flux.

d. Divide the weight of total chlorine usage (Wt) for the 3 test runs by the recorded measurement of the total weight of feed for the 3 test runs.

e. If a solid reactive flux other than magnesium chloride is used, the permittee must derive the appropriate proportion factor subject to approval by the Ohio EPA, Southeast District Office.

11. [40 CFR 63.1516(a)]  
 By March 24, 2003, the permittee must develop and implement a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:

a. procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and

b. corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.

12. [40 CFR 63.1517(a)]  
 As required by 40 CFR 63.10(b), the permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart.

a. The permittee must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.

b. The permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche.

c. The permittee may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.

13. [40 CFR 63.1517(b)]  
 In addition to the general records required by 40 CFR 63.10(b), the permittee of a new or existing affected source (including an emissions unit in a secondary aluminum processing unit) must maintain records of:

a. For each group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer, records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.

b. For each affected source and emissions unit subject to an emission standard in kg/Mg (lb/ton) of feed/charge, records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.

c. Records of monthly inspections for proper unit labeling for each affected source and emissions unit subject to labeling requirements.

d. Records of annual inspections of emission capture/collection and closed vent systems.

e. Records for any approved alternative monitoring or test procedure.

f. Current copies of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:

- i. startup, shutdown, and malfunction plan;
- ii. for major sources, OM&M plan; and
- iii. site-specific secondary aluminum processing unit emission plan (if applicable).

g. For each secondary aluminum processing unit, records of total charge weight, or if the permittee chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.

14. [40 CFR 63.1510(t)]  
 Except as provided in section A.III.15, the permittee must calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for each secondary aluminum processing unit on a daily basis. To calculate the 3-day, 24-hour rolling average, the permittee must:

a. Calculate and record the total weight of material charged to each emissions unit in the secondary

- aluminum processing unit for each 24-hour day of operation using the feed/charge weight information required in 40 CFR 63.1510(e). If the permittee chooses to comply on the basis of weight of aluminum produced by the emissions unit, rather than weight of material charged to the emissions unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.
- b. Multiply the total feed/charge weight to the emissions unit, or the weight of aluminum produced by the emissions unit, for each emissions unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emissions unit (as determined during the performance test) to provide emissions for each emissions unit for the 24-hour period, in pounds.
  - c. Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.
  - d. Compute the 24-hour daily emission rate using the equation in 40 CFR 63.1510(t)(4).
  - e. Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.
15. [40 CFR 63.1510(u)]  
As an alternative to the procedures of section A.III.14, the permittee may demonstrate, through performance tests, that each individual emissions unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emissions unit.

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#### IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. [40 CFR 63.1515(b)]  
Each permittee must submit a notification of compliance status report within 60 days after the compliance dates specified in 40 CFR 63.1501. The notification must be signed by the responsible official who must certify its accuracy. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. The permittee must provide duplicate notification to the applicable Regional Administrator. If a permittee submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report must include:
  - a. All information required in 40 CFR 63.9(h). The permittee must provide a complete performance test report for each affected source and emissions unit for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).
  - b. Unit labeling as described in 40 CFR 63.1506(b), including process type or furnace classification and operating requirements.
  - c. The compliant operating parameter value or range established for each affected source or emissions unit with supporting documentation and a description of the procedure used to establish the value (e.g., total reactive chlorine flux injection rate, including the operating cycle or time period used in the performance test.)
  - d. Approved OM&M plan (including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device).
  - e. Startup, shutdown, and malfunction plan, with revisions.
3. [40 CFR 63.1516(b)(1)]  
As required by 40 CFR 63.10(e)(3), the permittee must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). When no deviations of parameters have occurred, the permittee must submit a report stating that no excess emissions occurred during the reporting period.
  - a. A report must be submitted if any of these conditions occur during a 6-month reporting period:
    - i. An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).
    - ii. An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).
    - iii. An affected source (including an emissions unit in a secondary aluminum processing unit) was not operated according to the requirements of this subpart.
    - iv. A deviation from the 3-day, 24-hour rolling average emission limit for a secondary aluminum processing unit.
4. [40 CFR 63.1516(c)]  
For the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the permittee must certify continuing compliance based upon, but not limited to, the following conditions:
  - a. any period of excess emissions, as defined in this section, that occurred during the year were reported as

required by this section; and

b. all monitoring, record keeping, and reporting requirements were met during the year.

5. [40 CFR 63.1512(r)]

The permittee of each group 1 furnace must submit the information described in 40 CFR 63.1515(b)(3) as part of the notification of compliance status report to document conformance with the operational standard in 40 CFR 63.1506(b).

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible emission limit shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

b. Emission Limitation:

16.6 pounds per hour of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirement specified in section A.V.2.

c. Emission Limitation:

120.6 pounds per hour of sulfur dioxide

Applicable Compliance Method:

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 6.

d. Emission Limitation:

0.40 pound of particulate emissions per ton of feed/charge

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.

e. Emission Limitation:

2.1 x 10<sup>-4</sup> gr of D/F TEQ per ton of feed/charge

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.

f. Emission Limitation:

0.40 pound of HCl per ton of feed/charge

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.

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

a. The emission testing shall be conducted within 12 to 24 months after issuance of the permit and within 12 months prior to permit expiration.

- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.  
Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office as required by 40 CFR 63.1515(a)(6). 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 emission test(s).
- 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.
- 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 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.
3. [40 CFR 63.1511(a)]  
Prior to conducting a performance test required by this section, the permittee must prepare and submit a site-specific test plan meeting the requirements in 40 CFR 63.7(c).
4. [40 CFR 63.1511(b)]  
Following approval of the site-specific test plan, the permittee must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected source and emissions unit, and report the results in the notification of compliance status report as described in 40 CFR 63.1515(b). The permittee must conduct each performance test according to the requirements of the general provisions in Subpart A of 40 CFR Part 63 and this permit.
- a. The permittee must conduct each test while the affected source or emissions unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.
- b. 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.
- c. 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.
- d. 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.
- e. 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.
5. [40 CFR 63.1512(j)]  
The permittee must conduct performance tests as described below. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl and g TEQ/Mg of feed/charge for D/F emissions from each emission unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in 40 CFR 63.1510(t). A performance test is required for:
- a. Each group 1 furnace processing only clean charge to measure emissions of PM and either:
- i. emissions of HCl (for the emission limit); or
- ii. the mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).
- b. Each group 1 furnace that processes scrap other than clean charge to measure emissions of PM and D/F and either:
- i. emissions of HCl (for the emission limit); or
- ii. the mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).
- c. Each in-line fluxer to measure emissions of PM and HCl.
6. [40 CFR 63.1511(c)]  
The permittee must use the following methods in Appendix A to 40 CFR Part 60 to determine compliance with the applicable emission limits or standards:
- a. Method 1 for sample and velocity traverses.
- b. Method 2 for velocity and volumetric flow rate.
- c. Method 3 for gas analysis.
- d. Method 4 for moisture content of the stack gas.

- e. Method 5 for the concentration of PM.  
 f. Method 9 for visible emission observations.  
 g. Method 23 for the concentration of D/F.  
 h. Method 25A for the concentration of THC, as propane.  
 i. Method 26A for the concentration of HCl. Where a lime-injected fabric filter is used as the control device to comply with the 90 percent reduction standard, the permittee must measure the fabric filter inlet concentration of HCl at a point before lime is introduced to the system.
7. [40 CFR 63.1511(d)]  
 The permittee may use an alternative test method, subject to approval by the Administrator.
8. [40 CFR 63.1512(e)(3)]  
 The permittee may choose to determine the rate of reactive flux addition to the group 1 furnace and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all reactive flux added to the group 1 furnace is emitted. Under these circumstances, the permittee is not required to conduct an emission test for HCl.
9. [40 CFR 63.1511(e)]  
 The permittee of new or existing affected sources and emissions units located at secondary aluminum production facilities that are major sources must conduct a performance test every 5 years following the initial performance test.
10. [40 CFR 63.1511(f)]  
 With the approval of the Ohio EPA, Southeast District Office, a single representative or similar group 1 furnace or in-line fluxer which is not controlled by an add-on control device may be tested to determine the emission rate of all like affected sources at a facility provided that:
- the tested emissions unit must use identical feed/charge and flux materials in the same proportions as the emission units that it represents;
  - the tested emissions unit is subject to the same work practices as the emissions units that it represents;
  - the tested emissions unit is of the same design as the emissions units that it represents;
  - the tested emissions unit is tested under the highest load or capacity reasonably expected to occur for any of the emissions units that it represents;
  - at least one of each different style of emissions unit at the facility is tested; and
  - all add-on control devices are tested.
11. [40 CFR 63.1513(b)]  
 The following equation shall be used to determine compliance with an emission limit for PM, HCl, and D/F:
- $$E = (C \times Q \times K1) / P$$
- where:
- E = emission rate of particulates, HCl, or D/F, kg/Mg (lb/ton) of feed;  
 C = concentration of particulates, HCl, or D/F, g/dscm (gr/dscf);  
 Q = volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);  
 K1 = conversion factor, 1 kg/1,000 g (1 lb/7,000 gr); and  
 P = production rate, Mg/hr (ton/hr).
12. [40 CFR 63.1513(e)]  
 The equation contained in 40 CFR 63.1513(e)(1) shall be used to determine compliance with the mass-weighted PM emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 1 in 40 CFR 63.1505(k).
- The equation contained in 40 CFR 63.1513(e)(2) shall be used to determine compliance with the aluminum mass-weighted HCl emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 2 in 40 CFR 63.1505(k).
- The equation contained in 40 CFR 63.1513(e)(3) shall be used to determine compliance with the aluminum mass-weighted D/F emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 3 in 40 CFR 63.1505(k).
- As an alternative to using the equations in this section, the permittee may demonstrate compliance for a secondary aluminum processing unit by demonstrating that each existing group 1 furnace is in compliance with the emission limits for a new group 1 furnace in 40 CFR 63.1505(i) and that each existing in-line fluxer is in compliance with the emission limits for a new in-line fluxer in 40 CFR 63.1505(j).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: P006 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<b>2. Additional Terms and Conditions</b>			
1.	None		

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. None

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0656000014 Emissions Unit ID: P007 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired melt and hold furnace #7 - group 1 furnace with no controls	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	This emissions unit is limited to 16.5 pounds of particulate emissions per hour.
	OAC rule 3745-18-06(E)(2)	Sulfur dioxide emissions shall not exceed 120.6 pounds per hour.
	40 CFR Part 63, Subpart RRR	Upon the effective date of 40 CFR Part 63, Subpart RRR, this emissions unit is limited to the following in accordance with 40 CFR 63.1505(i):  0.40 pound of particulates per ton of feed/charge from a group 1 furnace, that is not a melting/holding furnace processing only clean charge;  2.1 x 10 <sup>-4</sup> gr of D/F TEQ (see A.I.2.a) per ton of feed/charge from a group 1 furnace, (this limit does not apply if the furnace processes only clean charge); and  0.40 pound of hydrogen chloride (HCl) per ton of feed/charge.

**2. Additional Terms and Conditions**

- a. D/F means dioxins and furans. Dioxins and furans means tetra-, penta-, hexa-, and octachlorinated dibenzo dioxins and furans. TEQ means the international method of expressing toxicity equivalents for dioxins and furans as defined in "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update" (EPA-625/3-89-016), available from the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, Virginia 22161, NTIS no. PB 90-145756.

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**II. Operational Restrictions**

1. [40 CFR 63.1506(n)]  
The permittee of a group 1 furnace (including a group 1 furnace that is part of a secondary aluminum processing unit) without add-on air pollution control devices must:
  - a. Maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test.
  - b. Operate each furnace in accordance with the work practice/pollution prevention measures documented in the OM&M plan and within the parameter values or ranges established in the OM&M plan.
  - c. Operate each group 1 melting/holding furnace subject to the emission standards in 40 CFR 63.1505(i)(2) using only clean charge as the feedstock.
2. [40 CFR 63.1506(b)]  
By March 24, 2003, the permittee must provide and maintain easily visible labels posted at each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln that identifies the applicable emission limits and means of compliance, including:
  - a. The type of affected source or emission unit (e.g., scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, in-line fluxer).
  - b. The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the operation, maintenance, and monitoring (OM&M) plan.
3. [40 CFR 63.1506(p)]  
When a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the performance test and incorporated in the OM&M plan, the permittee must initiate corrective action. Corrective action must restore operation of the affected source or emissions

unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.

4. [40 CFR 63.1511(g)]

By March 24, 2003, the permittee of the new or existing affected sources and emissions 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 permittee 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 permittee 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:

- a. the complete emission test report(s) used as the basis of the parameter(s) is submitted;
- b. the same test methods and procedures as required by this subpart were used in the test;
- c. the permittee 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; and
- d. all process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report.

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

2. [40 CFR 63.1510(b)]

The permittee must prepare and implement for each new or existing affected source and emissions unit, a written OM&M plan. By March 24, 2003, the permittee must submit the plan to the Ohio EPA, Southeast District Office for review and approval as part of the application for a part 70 or part 71 permit. Any subsequent changes to the plan must be submitted to the Ohio EPA, Southeast District Office for review and approval. Pending approval by the Ohio EPA, Southeast District Office of an initial or amended plan, the owner or operator must comply with the provisions of the submitted plan. Each plan must contain the following information:

- a. Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
- b. A monitoring schedule for each affected source and emissions unit.
- c. Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR 63.1505.
- d. Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
  - i. calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and
  - ii. procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in Subpart A of 40 CFR Part 63.
- e. Procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
- f. Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in this section, including:
  - i. procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and
  - ii. procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
- g. A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
- h. Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in 40 CFR 63.1510(o) for each group 1 furnace not equipped with an add-on air pollution control device.

3. [40 CFR 63.1510(s)]  
The permittee of a secondary aluminum processing unit at a facility must include, within the OM&M plan prepared in accordance with 40 CFR 63.1510(b), the following information:
- the identification of each emissions unit in the secondary aluminum processing unit;
  - the specific control technology or pollution prevention measure to be used for each emissions unit in the secondary aluminum processing unit and the date of its installation or application;
  - the emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;
  - information and data demonstrating compliance for each emissions unit with all applicable design, equipment, work practice or operational standards of this subpart; and
  - the monitoring requirements applicable to each emissions unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average (3-day, 24-hour rolling average means daily calculations of the average 24-hour emission rate over the 3 most recent consecutive 24-hour periods) using the procedure in 40 CFR 63.1510(t).
4. The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:
- any averaging among emissions of differing pollutants;
  - the inclusion of any affected sources other than emissions units in a secondary aluminum processing unit;
  - the inclusion of any emissions unit while it is shut down; or
  - the inclusion of any periods of startup, shutdown, or malfunction in emission calculations.
- To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the permittee must submit a request to the Ohio EPA, Southeast District Office containing the information required by paragraph (a) of this section and obtain approval of the Ohio EPA, Southeast District Office prior to implementing any revisions.
5. [40 CFR 63.1510(c)]  
The permittee must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.
6. [40 CFR 63.1510(j)]  
By March 24, 2003, the permittee must:
- Install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emissions unit.
    - The monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.
    - The accuracy of the weight measurement device must be plus or minus 1% of the weight of the reactive component of the flux being measured. The permittee may apply to the Ohio EPA, Southeast District Office for permission to use a weight measurement device of alternative accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of plus or minus 1% impracticable. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards.
    - The permittee must 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.
  - Calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - Record, for each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of:
    - gaseous or liquid reactive flux other than chlorine; and
    - solid reactive flux.
  - Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - The permittee of a group 1 furnace or in-line fluxer performing reactive fluxing may apply to the Administrator for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis.
7. [40 CFR 63.1506(d)]  
By March 24, 2003, the permittee of each affected source or emissions unit subject to an emission limit in lb/ton of feed/charge must:
- Except as provided in paragraph (3) of this section, install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test.
  - Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
  - The permittee may choose to measure and record aluminum production weight from an affected source or emissions unit rather than feed/charge weight to an affected source or emissions unit, provided that:
    - the aluminum production weight, rather than feed/charge weight is measured and recorded for all emissions units within a SAPU; and

- ii. all calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.
8. [40 CFR 63.1510(e)]  
By March 24, 2003, the permittee of an affected source or emissions unit subject to an emission limit in kg/Mg (lb/ton) or g/Mg (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emissions unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emissions unit-by-emissions unit basis. As an alternative to a measurement device, the permittee may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emissions unit.
- a. The accuracy of the weight measurement device or procedure must be plus or minus 1 percent of the weight being measured. The permittee may apply to the Ohio EPA, Southeast District Office for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standard.
- b. The permittee must 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.
9. [40 CFR 63.1512(k)]  
During the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the permittee of an affected source or emissions 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 emissions unit for each of the three test runs and calculate and record the total weight. A permittee that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emissions unit or affected source instead of the feed/charge weight.
10. [40 CFR 63.1512(o)]  
The permittee must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.
- a. Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15-minute period during the HCl and D/F 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.
- b. Record the identity, composition, and total weight of each addition of solid reactive flux for the 3 test runs.
- c. 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 the following equation:
- $$Wt = (F1)(W1) + (F2)(W2)$$
- where:
- Wt = total chlorine usage, by weight;  
F1 = fraction of gaseous or liquid flux that is chlorine;  
W1 = weight of reactive flux gas or liquid injected;  
F2 = fraction of solid reactive chloride flux that is chlorine (e.g., F = 0.75 for magnesium chloride); and  
W2 = weight of solid reactive flux.
- d. Divide the weight of total chlorine usage (Wt) for the 3 test runs by the recorded measurement of the total weight of feed for the 3 test runs.
- e. If a solid reactive flux other than magnesium chloride is used, the permittee must derive the appropriate proportion factor subject to approval by the Ohio EPA, Southeast District Office.
11. [40 CFR 63.1516(a)]  
By March 24, 2003, the permittee must develop and implement a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:
- a. procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
- b. corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
12. [40 CFR 63.1517(a)]  
As required by 40 CFR 63.10(b), the permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart.
- a. The permittee must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.

- b. The permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche.
- c. The permittee may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.
13. [40 CFR 63.1517(b)]  
In addition to the general records required by 40 CFR 63.10(b), the permittee of a new or existing affected source (including an emissions unit in a secondary aluminum processing unit) must maintain records of:
- a. For each group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer, records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.
- b. For each affected source and emissions unit subject to an emission standard in kg/Mg (lb/ton) of feed/charge, records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.
- c. Records of monthly inspections for proper unit labeling for each affected source and emissions unit subject to labeling requirements.
- d. Records of annual inspections of emission capture/collection and closed vent systems.
- e. Records for any approved alternative monitoring or test procedure.
- f. Current copies of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:
- i. startup, shutdown, and malfunction plan;
- ii. for major sources, OM&M plan; and
- iii. site-specific secondary aluminum processing unit emission plan (if applicable).
- g. For each secondary aluminum processing unit, records of total charge weight, or if the permittee chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.
14. [40 CFR 63.1510(t)]  
Except as provided in section A.III.15, the permittee must calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for each secondary aluminum processing unit on a daily basis. To calculate the 3-day, 24-hour rolling average, the permittee must:
- a. Calculate and record the total weight of material charged to each emissions unit in the secondary aluminum processing unit for each 24-hour day of operation using the feed/charge weight information required in 40 CFR 63.1510(e). If the permittee chooses to comply on the basis of weight of aluminum produced by the emissions unit, rather than weight of material charged to the emissions unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.
- b. Multiply the total feed/charge weight to the emissions unit, or the weight of aluminum produced by the emissions unit, for each emissions unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emissions unit (as determined during the performance test) to provide emissions for each emissions unit for the 24-hour period, in pounds.
- c. Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.
- d. Compute the 24-hour daily emission rate using the equation in 40 CFR 63.1510(t)(4).
- e. Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.
15. [40 CFR 63.1510(u)]  
As an alternative to the procedures of section A.III.14, the permittee may demonstrate, through performance tests, that each individual emissions unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emissions unit.

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#### IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. [40 CFR 63.1515(b)]  
Each permittee must submit a notification of compliance status report within 60 days after the compliance dates specified in 40 CFR 63.1501. The notification must be signed by the responsible official who must certify its accuracy. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. The permittee must provide duplicate notification to the applicable Regional Administrator. If a permittee submits

the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report must include:

- a. All information required in 40 CFR 63.9(h). The permittee must provide a complete performance test report for each affected source and emissions unit for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).
  - b. Unit labeling as described in 40 CFR 63.1506(b), including process type or furnace classification and operating requirements.
  - c. The compliant operating parameter value or range established for each affected source or emissions unit with supporting documentation and a description of the procedure used to establish the value (e.g., total reactive chlorine flux injection rate, including the operating cycle or time period used in the performance test.)
  - d. Approved OM&M plan (including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device).
  - e. Startup, shutdown, and malfunction plan, with revisions.
3. [40 CFR 63.1516(b)(1)]  
As required by 40 CFR 63.10(e)(3), the permittee must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). When no deviations of parameters have occurred, the permittee must submit a report stating that no excess emissions occurred during the reporting period.
- a. A report must be submitted if any of these conditions occur during a 6-month reporting period:
    - i. An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).
    - ii. An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).
    - iii. An affected source (including an emissions unit in a secondary aluminum processing unit) was not operated according to the requirements of this subpart.
    - iv. A deviation from the 3-day, 24-hour rolling average emission limit for a secondary aluminum processing unit.
4. [40 CFR 63.1516(c)]  
For the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the permittee must certify continuing compliance based upon, but not limited to, the following conditions:
- a. any period of excess emissions, as defined in this section, that occurred during the year were reported as required by this section; and
  - b. all monitoring, record keeping, and reporting requirements were met during the year.
5. [40 CFR 63.1512(r)]  
The permittee of each group 1 furnace must submit the information described in 40 CFR 63.1515(b)(3) as part of the notification of compliance status report to document conformance with the operational standard in 40 CFR 63.1506(b).

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#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible emission limit shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
  - b. Emission Limitation:
 

16.6 pounds per hour of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirement specified in section A.V.2.
  - c. Emission Limitation:

- 120.6 pounds per hour of sulfur dioxide
- Applicable Compliance Method:
- Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 6.
- d. Emission Limitation:
- 0.40 pound of particulate emissions per ton of feed/charge
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
- e. Emission Limitation:
- 2.1 x 10<sup>-4</sup> gr of D/F TEQ per ton of feed/charge
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
- f. Emission Limitation:
- 0.40 pound of HCl per ton of feed/charge
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 12 to 24 months after issuance of the permit and within 12 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office as required by 40 CFR 63.1515(a)(6). 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 emission test(s).
- 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.
- 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 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.
3. [40 CFR 63.1511(a)]  
Prior to conducting a performance test required by this section, the permittee must prepare and submit a site-specific test plan meeting the requirements in 40 CFR 63.7(c).
4. [40 CFR 63.1511(b)]  
Following approval of the site-specific test plan, the permittee must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected source and emissions unit, and report the results in the notification of compliance status report as described in 40 CFR 63.1515(b). The permittee must conduct each performance test according to the requirements of the general provisions in Subpart A of 40 CFR Part 63 and this permit.
- a. The permittee must conduct each test while the affected source or emissions unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.
- b. 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.
- c. 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.
  - d. 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.
  - e. 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.
5. [40 CFR 63.1512(j)]  
The permittee must conduct performance tests as described below. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl and g TEQ/Mg of feed/charge for D/F emissions from each emission unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in 40 CFR 63.1510(t). A performance test is required for:
- a. Each group 1 furnace processing only clean charge to measure emissions of PM and either:
    - i. emissions of HCl (for the emission limit); or
    - ii. the mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).
  - b. Each group 1 furnace that processes scrap other than clean charge to measure emissions of PM and D/F and either:
    - i. emissions of HCl (for the emission limit); or
    - ii. the mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).
  - c. Each in-line fluxer to measure emissions of PM and HCl.
6. [40 CFR 63.1511(c)]  
The permittee must use the following methods in Appendix A to 40 CFR Part 60 to determine compliance with the applicable emission limits or standards:
- a. Method 1 for sample and velocity traverses.
  - b. Method 2 for velocity and volumetric flow rate.
  - c. Method 3 for gas analysis.
  - d. Method 4 for moisture content of the stack gas.
  - e. Method 5 for the concentration of PM.
  - f. Method 9 for visible emission observations.
  - g. Method 23 for the concentration of D/F.
  - h. Method 25A for the concentration of THC, as propane.
  - i. Method 26A for the concentration of HCl. Where a lime-injected fabric filter is used as the control device to comply with the 90 percent reduction standard, the permittee must measure the fabric filter inlet concentration of HCl at a point before lime is introduced to the system.
7. [40 CFR 63.1511(d)]  
The permittee may use an alternative test method, subject to approval by the Administrator.
8. [40 CFR 63.1512(e)(3)]  
The permittee may choose to determine the rate of reactive flux addition to the group 1 furnace and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all reactive flux added to the group 1 furnace is emitted. Under these circumstances, the permittee is not required to conduct an emission test for HCl.
9. [40 CFR 63.1511(e)]  
The permittee of new or existing affected sources and emissions units located at secondary aluminum production facilities that are major sources must conduct a performance test every 5 years following the initial performance test.
10. [40 CFR 63.1511(f)]  
With the approval of the Ohio EPA, Southeast District Office, a single representative or similar group 1 furnace or in-line fluxer which is not controlled by an add-on control device may be tested to determine the emission rate of all like affected sources at a facility provided that:
- a. the tested emissions unit must use identical feed/charge and flux materials in the same proportions as the emission units that it represents;
  - b. the tested emissions unit is subject to the same work practices as the emissions units that it represents;
  - c. the tested emissions unit is of the same design as the emissions units that it represents;
  - d. the tested emissions unit is tested under the highest load or capacity reasonably expected to occur for any of the emissions units that it represents;
  - e. at least one of each different style of emissions unit at the facility is tested; and
  - f. all add-on control devices are tested.
11. [40 CFR 63.1513(b)]

The following equation shall be used to determine compliance with an emission limit for PM, HCl, and D/F:

$$E = (C \times Q \times K1) / P$$

where:

E = emission rate of particulates, HCl, or D/F, kg/Mg (lb/ton) of feed;  
 C = concentration of particulates, HCl, or D/F, g/dscm (gr/dscf);  
 Q = volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);  
 K1 = conversion factor, 1 kg/1,000 g (1 lb/7,000 gr); and  
 P = production rate, Mg/hr (ton/hr).

- 12. [40 CFR 63.1513(e)]  
 The equation contained in 40 CFR 63.1513(e)(1) shall be used to determine compliance with the mass-weighted PM emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 1 in 40 CFR 63.1505(k).

The equation contained in 40 CFR 63.1513(e)(2) shall be used to determine compliance with the aluminum mass-weighted HCl emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 2 in 40 CFR 63.1505(k).

The equation contained in 40 CFR 63.1513(e)(3) shall be used to determine compliance with the aluminum mass-weighted D/F emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 3 in 40 CFR 63.1505(k).

As an alternative to using the equations in this section, the permittee may demonstrate compliance for a secondary aluminum processing unit by demonstrating that each existing group 1 furnace is in compliance with the emission limits for a new group 1 furnace in 40 CFR 63.1505(j) and that each existing in-line fluxer is in compliance with the emission limits for a new in-line fluxer in 40 CFR 63.1505(j).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0656000014 Emissions Unit ID: P007 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0656000014 Emissions Unit ID: P008 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired melt and hold furnace #8 - group 1 furnace with no controls	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	This emissions unit is limited to 10.9 pounds of particulate emissions per hour.
	OAC rule 3745-18-06(E)(2)	Sulfur dioxide emissions shall not exceed 75.6 pounds per hour.
	40 CFR Part 63, Subpart RRR	Upon the effective date of 40 CFR Part 63, Subpart RRR, this emissions unit is limited to the following in accordance with 40 CFR 63.1505(i):  0.40 pound of particulates per ton of feed/charge from a group 1 furnace, that is not a melting/holding furnace processing only clean charge;  2.1 x 10 <sup>-4</sup> gr of D/F TEQ (see A.1.2.a) per ton of feed/charge from a group 1 furnace, (this limit does not apply if the furnace processes only clean charge); and  0.40 pound of hydrogen chloride (HCl) per ton of feed/charge.

- 2. **Additional Terms and Conditions**

- a. D/F means dioxins and furans. Dioxins and furans means tetra-, penta-, hexa-, and octachlorinated dibenzo dioxins and furans. TEQ means the international method of expressing toxicity equivalents for dioxins and furans as defined in "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update" (EPA-625/3-89-016), available from the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, Virginia 22161, NTIS no. PB 90-145756.

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## II. Operational Restrictions

1. [40 CFR 63.1506(n)]  
The permittee of a group 1 furnace (including a group 1 furnace that is part of a secondary aluminum processing unit) without add-on air pollution control devices must:
  - a. Maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test.
  - b. Operate each furnace in accordance with the work practice/pollution prevention measures documented in the OM&M plan and within the parameter values or ranges established in the OM&M plan.
  - c. Operate each group 1 melting/holding furnace subject to the emission standards in 40 CFR 63.1505(i)(2) using only clean charge as the feedstock.
2. [40 CFR 63.1506(b)]  
By March 24, 2003, the permittee must provide and maintain easily visible labels posted at each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln that identifies the applicable emission limits and means of compliance, including:
  - a. The type of affected source or emission unit (e.g., scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, in-line fluxer).
  - b. The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the operation, maintenance, and monitoring (OM&M) plan.
3. [40 CFR 63.1506(p)]  
When a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the performance test and incorporated in the OM&M plan, the permittee must initiate corrective action. Corrective action must restore operation of the affected source or emissions unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.
4. [40 CFR 63.1511(g)]  
By March 24, 2003, the permittee of the new or existing affected sources and emissions 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 permittee 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 permittee 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:
  - a. the complete emission test report(s) used as the basis of the parameter(s) is submitted;
  - b. the same test methods and procedures as required by this subpart were used in the test;
  - c. the permittee 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; and
  - d. all process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report.

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## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
2. [40 CFR 63.1510(b)]

The permittee must prepare and implement for each new or existing affected source and emissions unit, a written OM&M plan. By March 24, 2003, the permittee must submit the plan to the Ohio EPA, Southeast District Office for review and approval as part of the application for a part 70 or part 71 permit. Any subsequent changes to the plan must be submitted to the Ohio EPA, Southeast District Office for review and approval. Pending approval by the Ohio EPA, Southeast District Office of an initial or amended plan, the owner or operator must comply with the provisions of the submitted plan. Each plan must contain the following information:

- a. Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
  - b. A monitoring schedule for each affected source and emissions unit.
  - c. Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR 63.1505.
  - d. Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
    - i. calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and
    - ii. procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in Subpart A of 40 CFR Part 63.
  - e. Procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
  - f. Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in this section, including:
    - i. procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and
    - ii. procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
  - g. A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
  - h. Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in 40 CFR 63.1510(o) for each group 1 furnace not equipped with an add-on air pollution control device.
3. [40 CFR 63.1510(s)]  
The permittee of a secondary aluminum processing unit at a facility must include, within the OM&M plan prepared in accordance with 40 CFR 63.1510(b), the following information:
- a. the identification of each emissions unit in the secondary aluminum processing unit;
  - b. the specific control technology or pollution prevention measure to be used for each emissions unit in the secondary aluminum processing unit and the date of its installation or application;
  - c. the emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;
  - d. information and data demonstrating compliance for each emissions unit with all applicable design, equipment, work practice or operational standards of this subpart; and
  - e. the monitoring requirements applicable to each emissions unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average (3-day, 24-hour rolling average means daily calculations of the average 24-hour emission rate over the 3 most recent consecutive 24-hour periods) using the procedure in 40 CFR 63.1510(t).
4. The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:
- a. any averaging among emissions of differing pollutants;
  - b. the inclusion of any affected sources other than emissions units in a secondary aluminum processing unit;
  - c. the inclusion of any emissions unit while it is shut down; or
  - d. the inclusion of any periods of startup, shutdown, or malfunction in emission calculations.
- To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the permittee must submit a request to the Ohio EPA, Southeast District Office containing the information required by paragraph (a) of this section and obtain approval of the Ohio EPA, Southeast District Office prior to implementing any revisions.
5. [40 CFR 63.1510(c)]  
The permittee must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.
6. [40 CFR 63.1510(j)]  
By March 24, 2003, the permittee must:
- a. Install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emissions unit.
    - i. The monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.
    - ii. The accuracy of the weight measurement device must be plus or minus 1% of the weight of the reactive component of the flux being measured. The permittee may apply to the Ohio EPA, Southeast District Office

- for permission to use a weight measurement device of alternative accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of plus or minus 1% impracticable. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards.
- iii. The permittee must 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.
- b. Calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
- c. Record, for each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of:
- gaseous or liquid reactive flux other than chlorine; and
  - solid reactive flux.
- d. Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
- e. The permittee of a group 1 furnace or in-line fluxer performing reactive fluxing may apply to the Administrator for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis.
7. [40 CFR 63.1506(d)]  
By March 24, 2003, the permittee of each affected source or emissions unit subject to an emission limit in lb/ton of feed/charge must:
- Except as provided in paragraph (3) of this section, install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test.
  - Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
  - The permittee may choose to measure and record aluminum production weight from an affected source or emissions unit rather than feed/charge weight to an affected source or emissions unit, provided that:
    - the aluminum production weight, rather than feed/charge weight is measured and recorded for all emissions units within a SAPU; and
    - all calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.
8. [40 CFR 63.1510(e)]  
By March 24, 2003, the permittee of an affected source or emissions unit subject to an emission limit in kg/Mg (lb/ton) or g/Mg (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emissions unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emissions unit-by-emissions unit basis. As an alternative to a measurement device, the permittee may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emissions unit.
- The accuracy of the weight measurement device or procedure must be plus or minus 1 percent of the weight being measured. The permittee may apply to the Southeast District Office for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standard.
  - The permittee must 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.
9. [40 CFR 63.1512(k)]  
During the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the permittee of an affected source or emissions 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 emissions unit for each of the three test runs and calculate and record the total weight. A permittee that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emissions unit or affected source instead of the feed/charge weight.
10. [40 CFR 63.1512(o)]  
The permittee must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.
- Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15-minute period during the HCl and D/F 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.
  - Record the identity, composition, and total weight of each addition of solid reactive flux for the 3 test runs.
  - 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 the following equation:

$$Wt = (F1)(W1) + (F2)(W2)$$

where:

Wt = total chlorine usage, by weight;

F1 = fraction of gaseous or liquid flux that is chlorine;

W1 = weight of reactive flux gas or liquid injected;

F2 = fraction of solid reactive chloride flux that is chlorine (e.g., F = 0.75 for magnesium chloride); and

W2 = weight of solid reactive flux.

d. Divide the weight of total chlorine usage (Wt) for the 3 test runs by the recorded measurement of the total weight of feed for the 3 test runs.

e. If a solid reactive flux other than magnesium chloride is used, the permittee must derive the appropriate proportion factor subject to approval by the Ohio EPA, Southeast District Office.

11. [40 CFR 63.1516(a)]

By March 24, 2003, the permittee must develop and implement a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:

a. procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and

b. corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.

12. [40 CFR 63.1517(a)]

As required by 40 CFR 63.10(b), the permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart.

a. The permittee must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.

b. The permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche.

c. The permittee may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.

13. [40 CFR 63.1517(b)]

In addition to the general records required by 40 CFR 63.10(b), the permittee of a new or existing affected source (including an emissions unit in a secondary aluminum processing unit) must maintain records of:

a. For each group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer, records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.

b. For each affected source and emissions unit subject to an emission standard in kg/Mg (lb/ton) of feed/charge, records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.

c. Records of monthly inspections for proper unit labeling for each affected source and emissions unit subject to labeling requirements.

d. Records of annual inspections of emission capture/collection and closed vent systems.

e. Records for any approved alternative monitoring or test procedure.

f. Current copies of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:

i. startup, shutdown, and malfunction plan;

ii. for major sources, OM&M plan; and

iii. site-specific secondary aluminum processing unit emission plan (if applicable).

g. For each secondary aluminum processing unit, records of total charge weight, or if the permittee chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.

14. [40 CFR 63.1510(t)]

Except as provided in section A.III.15, the permittee must calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for each secondary aluminum processing unit on a daily basis. To calculate the 3-day, 24-hour rolling average, the permittee must:

a. Calculate and record the total weight of material charged to each emissions unit in the secondary aluminum processing unit for each 24-hour day of operation using the feed/charge weight information required in 40 CFR 63.1510(e). If the permittee chooses to comply on the basis of weight of aluminum

produced by the emissions unit, rather than weight of material charged to the emissions unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.

b. Multiply the total feed/charge weight to the emissions unit, or the weight of aluminum produced by the emissions unit, for each emissions unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emissions unit (as determined during the performance test) to provide emissions for each emissions unit for the 24-hour period, in pounds.

c. Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.

d. Compute the 24-hour daily emission rate using the equation in 40 CFR 63.1510(t)(4).

e. Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.

15. [40 CFR 63.1510(u)]

As an alternative to the procedures of section A.III.14, the permittee may demonstrate, through performance tests, that each individual emissions unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emissions unit.

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#### IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. [40 CFR 63.1515(b)]  
Each permittee must submit a notification of compliance status report within 60 days after the compliance dates specified in 40 CFR 63.1501. The notification must be signed by the responsible official who must certify its accuracy. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. The permittee must provide duplicate notification to the applicable Regional Administrator. If a permittee submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report must include:
  - a. All information required in 40 CFR 63.9(h). The permittee must provide a complete performance test report for each affected source and emissions unit for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).
  - b. Unit labeling as described in 40 CFR 63.1506(b), including process type or furnace classification and operating requirements.
  - c. The compliant operating parameter value or range established for each affected source or emissions unit with supporting documentation and a description of the procedure used to establish the value (e.g., total reactive chlorine flux injection rate, including the operating cycle or time period used in the performance test.)
  - d. Approved OM&M plan (including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device).
  - e. Startup, shutdown, and malfunction plan, with revisions.
3. [40 CFR 63.1516(b)(1)]  
As required by 40 CFR 63.10(e)(3), the permittee must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). When no deviations of parameters have occurred, the permittee must submit a report stating that no excess emissions occurred during the reporting period.
  - a. A report must be submitted if any of these conditions occur during a 6-month reporting period:
    - i. An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).
    - ii. An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).
    - iii. An affected source (including an emissions unit in a secondary aluminum processing unit) was not operated according to the requirements of this subpart.
    - iv. A deviation from the 3-day, 24-hour rolling average emission limit for a secondary aluminum processing unit.
4. [40 CFR 63.1516(c)]  
For the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the permittee must certify continuing compliance based upon, but not limited to, the following conditions:
  - a. any period of excess emissions, as defined in this section, that occurred during the year were reported as required by this section; and

- b. all monitoring, record keeping, and reporting requirements were met during the year.
5. [40 CFR 63.1512(r)]  
The permittee of each group 1 furnace must submit the information described in 40 CFR 63.1515(b)(3) as part of the notification of compliance status report to document conformance with the operational standard in 40 CFR 63.1506(b).

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:  
20% opacity as a 6-minute average  
Applicable Compliance Method:  
Compliance with the visible emission limit shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
- b. Emission Limitation:  
16.6 pounds per hour of particulate emissions  
Applicable Compliance Method:  
Compliance shall be demonstrated based upon the stack testing requirement specified in section A.V.2.
- c. Emission Limitation:  
120.6 pounds per hour of sulfur dioxide  
Applicable Compliance Method:  
Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 6.
- d. Emission Limitation:  
0.40 pound of particulate emissions per ton of feed/charge  
Applicable Compliance Method:  
Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
- e. Emission Limitation:  
2.1 x 10<sup>-4</sup> gr of D/F TEQ per ton of feed/charge  
Applicable Compliance Method:  
Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
- f. Emission Limitation:  
0.40 pound of HCl per ton of feed/charge  
Applicable Compliance Method:  
Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 12 to 24 months after issuance of the permit and within 12 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office as required by 40 CFR 63.1515(a)(6). 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 emission test(s).

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.

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 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.

3. [40 CFR 63.1511(a)]  
Prior to conducting a performance test required by this section, the permittee must prepare and submit a site-specific test plan meeting the requirements in 40 CFR 63.7(c).
4. [40 CFR 63.1511(b)]  
Following approval of the site-specific test plan, the permittee must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected source and emissions unit, and report the results in the notification of compliance status report as described in 40 CFR 63.1515(b). The permittee must conduct each performance test according to the requirements of the general provisions in Subpart A of 40 CFR Part 63 and this permit.
  - a. The permittee must conduct each test while the affected source or emissions unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.
  - b. 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.
  - c. 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.
  - d. 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.
  - e. 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.
5. [40 CFR 63.1512(j)]  
The permittee must conduct performance tests as described below. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl and g TEQ/Mg of feed/charge for D/F emissions from each emission unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in 40 CFR 63.1510(t). A performance test is required for:
  - a. Each group 1 furnace processing only clean charge to measure emissions of PM and either:
    - i. emissions of HCl (for the emission limit); or
    - ii. the mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).
  - b. Each group 1 furnace that processes scrap other than clean charge to measure emissions of PM and D/F and either:
    - i. emissions of HCl (for the emission limit); or
    - ii. the mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).
  - c. Each in-line fluxer to measure emissions of PM and HCl.
6. [40 CFR 63.1511(c)]  
The permittee must use the following methods in Appendix A to 40 CFR Part 60 to determine compliance with the applicable emission limits or standards:
  - a. Method 1 for sample and velocity traverses.
  - b. Method 2 for velocity and volumetric flow rate.
  - c. Method 3 for gas analysis.
  - d. Method 4 for moisture content of the stack gas.
  - e. Method 5 for the concentration of PM.
  - f. Method 9 for visible emission observations.

- g. Method 23 for the concentration of D/F.  
 h. Method 25A for the concentration of THC, as propane.  
 i. Method 26A for the concentration of HCl. Where a lime-injected fabric filter is used as the control device to comply with the 90 percent reduction standard, the permittee must measure the fabric filter inlet concentration of HCl at a point before lime is introduced to the system.
7. [40 CFR 63.1511(d)]  
 The permittee may use an alternative test method, subject to approval by the Administrator.
8. [40 CFR 63.1512(e)(3)]  
 The permittee may choose to determine the rate of reactive flux addition to the group 1 furnace and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all reactive flux added to the group 1 furnace is emitted. Under these circumstances, the permittee is not required to conduct an emission test for HCl.
9. [40 CFR 63.1511(e)]  
 The permittee of new or existing affected sources and emissions units located at secondary aluminum production facilities that are major sources must conduct a performance test every 5 years following the initial performance test.
10. [40 CFR 63.1511(f)]  
 With the approval of the Ohio EPA, Southeast District Office, a single representative or similar group 1 furnace or in-line fluxer which is not controlled by an add-on control device may be tested to determine the emission rate of all like affected sources at a facility provided that:
- the tested emissions unit must use identical feed/charge and flux materials in the same proportions as the emission units that it represents;
  - the tested emissions unit is subject to the same work practices as the emissions units that it represents;
  - the tested emissions unit is of the same design as the emissions units that it represents;
  - the tested emissions unit is tested under the highest load or capacity reasonably expected to occur for any of the emissions units that it represents;
  - at least one of each different style of emissions unit at the facility is tested; and
  - all add-on control devices are tested.
11. [40 CFR 63.1513(b)]  
 The following equation shall be used to determine compliance with an emission limit for PM, HCl, and D/F:
- $$E = (C \times Q \times K1) / P$$
- where:
- E = emission rate of particulates, HCl, or D/F, kg/Mg (lb/ton) of feed;  
 C = concentration of particulates, HCl, or D/F, g/dscm (gr/dscf);  
 Q = volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);  
 K1 = conversion factor, 1 kg/1,000 g (1 lb/7,000 gr); and  
 P = production rate, Mg/hr (ton/hr).
12. [40 CFR 63.1513(e)]  
 The equation contained in 40 CFR 63.1513(e)(1) shall be used to determine compliance with the mass-weighted PM emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 1 in 40 CFR 63.1505(k).
- The equation contained in 40 CFR 63.1513(e)(2) shall be used to determine compliance with the aluminum mass-weighted HCl emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 2 in 40 CFR 63.1505(k).
- The equation contained in 40 CFR 63.1513(e)(3) shall be used to determine compliance with the aluminum mass-weighted D/F emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 3 in 40 CFR 63.1505(k).
- As an alternative to using the equations in this section, the permittee may demonstrate compliance for a secondary aluminum processing unit by demonstrating that each existing group 1 furnace is in compliance with the emission limits for a new group 1 furnace in 40 CFR 63.1505(i) and that each existing in-line fluxer is in compliance with the emission limits for a new in-line fluxer in 40 CFR 63.1505(j).

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VI. **Miscellaneous Requirements**

1. None

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**B. State Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<b>2. Additional Terms and Conditions</b>		
1. None		

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**A. State and Federally Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired melt and hold furnace #5 - group 1 furnace with no controls	OAC rule 3745-31-05 (PTIs 17-001 and 17-651)	0.141 pound of particulate emissions per ton of metal processed
		0.6 pound of sulfur dioxide (SO <sub>2</sub> ) per million cubic feet of natural gas consumed
		140 pounds of nitrogen oxides (NO <sub>x</sub> ) per million cubic feet of natural gas consumed
		35 pounds of carbon monoxide (CO) per million cubic feet of natural gas consumed
		5.8 pounds of organic compounds (OC) per million cubic feet of natural gas consumed
		See A.II.1 below.
		Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
		See A.I.2.a below.
		See A.I.2.a below.
		Upon the effective date of 40 CFR Part 63, Subpart RRR, this emissions unit is limited to the following in accordance with 40 CFR 63.1505(i):
OAC rule 3745-17-07(A)	0.40 pound of particulates per ton of feed/charge from a group 1 furnace, that is not a melting/holding furnace processing only clean charge;	
		2.1 x 10 <sup>-4</sup> gr of D/F TEQ (see A.I.2.b) per ton of feed/charge from a group 1 furnace, (this limit does not apply if the furnace processes only clean charge); and
		0.40 pound of hydrogen chloride (HCl) per ton of feed/charge.
OAC rule 3745-17-11(B) OAC rule 3745-18-06(E) 40 CFR Part 63, Subpart RRR		

2. **Additional Terms and Conditions**

- a. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.
- b. D/F means dioxins and furans. Dioxins and furans means tetra-, penta-, hexa-, and octachlorinated dibenzo dioxins and furans. TEQ means the international method of expressing toxicity equivalents for dioxins and furans as defined in "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update" (EPA-625/3-89-016), available from the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, Virginia 22161, NTIS no. PB 90-145756.

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II. **Operational Restrictions**

- 1. [40 CFR 63.1506(n)]  
The permittee of a group 1 furnace (including a group 1 furnace that is part of a secondary aluminum processing unit) without add-on air pollution control devices must:
  - a. Maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test.
  - b. Operate each furnace in accordance with the work practice/pollution prevention measures documented in the OM&M plan and within the parameter values or ranges established in the OM&M plan.
  - c. Operate each group 1 melting/holding furnace subject to the emission standards in 40 CFR 63.1505(i)(2) using only clean charge as the feedstock.
- 2. [40 CFR 63.1506(b)]  
By March 24, 2003, the permittee must provide and maintain easily visible labels posted at each group 1

furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln that identifies the applicable emission limits and means of compliance, including:

- a. The type of affected source or emission unit (e.g., scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, in-line fluxer).
  - b. The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the operation, maintenance, and monitoring (OM&M) plan.
3. [40 CFR 63.1506(p)]  
When a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the performance test and incorporated in the OM&M plan, the permittee must initiate corrective action. Corrective action must restore operation of the affected source or emissions unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.
  4. [40 CFR 63.1511(g)]  
By March 24, 2003, the permittee of the new or existing affected sources and emissions 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 permittee 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 permittee 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:
    - a. the complete emission test report(s) used as the basis of the parameter(s) is submitted;
    - b. the same test methods and procedures as required by this subpart were used in the test;
    - c. the permittee 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; and
    - d. all process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report.
  5. The permittee shall burn no more than 284,594,880 cubic feet of natural gas in this emissions unit per calendar year.

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### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
2. [40 CFR 63.1510(b)]  
The permittee must prepare and implement for each new or existing affected source and emissions unit, a written OM&M plan. By March 24, 2003, the permittee must submit the plan to the Ohio EPA, Southeast District Office for review and approval as part of the application for a part 70 or part 71 permit. Any subsequent changes to the plan must be submitted to the Ohio EPA, Southeast District Office for review and approval. Pending approval by the Ohio EPA, Southeast District Office of an initial or amended plan, the owner or operator must comply with the provisions of the submitted plan. Each plan must contain the following information:
  - a. Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
  - b. A monitoring schedule for each affected source and emissions unit.
  - c. Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR 63.1505.
  - d. Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
    - i. calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and
    - ii. procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in Subpart A of 40 CFR Part 63.

- e. Procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
  - f. Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in this section, including:
    - i. procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and
    - ii. procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
  - g. A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
  - h. Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in 40 CFR 63.1510(o) for each group 1 furnace not equipped with an add-on air pollution control device.
3. [40 CFR 63.1510(s)]  
The permittee of a secondary aluminum processing unit at a facility must include, within the OM&M plan prepared in accordance with 40 CFR 63.1510(b), the following information:
- a. the identification of each emissions unit in the secondary aluminum processing unit;
  - b. the specific control technology or pollution prevention measure to be used for each emissions unit in the secondary aluminum processing unit and the date of its installation or application;
  - c. the emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;
  - d. information and data demonstrating compliance for each emissions unit with all applicable design, equipment, work practice or operational standards of this subpart; and
  - e. the monitoring requirements applicable to each emissions unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average (3-day, 24-hour rolling average means daily calculations of the average 24-hour emission rate over the 3 most recent consecutive 24-hour periods) using the procedure in 40 CFR 63.1510(t).
4. The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:
- a. any averaging among emissions of differing pollutants;
  - b. the inclusion of any affected sources other than emissions units in a secondary aluminum processing unit;
  - c. the inclusion of any emissions unit while it is shut down; or
  - d. the inclusion of any periods of startup, shutdown, or malfunction in emission calculations.
- To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the permittee must submit a request to the Ohio EPA, Southeast District Office containing the information required by paragraph (a) of this section and obtain approval of the Ohio EPA, Southeast District Office prior to implementing any revisions.
5. [40 CFR 63.1510(c)]  
The permittee must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.
6. [40 CFR 63.1510(j)]  
By March 24, 2003, the permittee must:
- a. Install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emissions unit.
    - i. The monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.
    - ii. The accuracy of the weight measurement device must be plus or minus 1% of the weight of the reactive component of the flux being measured. The permittee may apply to the Ohio EPA, Southeast District Office for permission to use a weight measurement device of alternative accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of plus or minus 1% impracticable. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards.
    - iii. The permittee must 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.
  - b. Calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - c. Record, for each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of:
    - i. gaseous or liquid reactive flux other than chlorine; and
    - ii. solid reactive flux.
  - d. Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - e. The permittee of a group 1 furnace or in-line fluxer performing reactive fluxing may apply to the Administrator for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the permittee provides assurance through data and information that the affected source

will meet the relevant emission standards on a continuous basis.

7. [40 CFR 63.1506(d)]  
By March 24, 2003, the permittee of each affected source or emissions unit subject to an emission limit in lb/ton of feed/charge must:
- Except as provided in paragraph (3) of this section, install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test.
  - Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
  - The permittee may choose to measure and record aluminum production weight from an affected source or emissions unit rather than feed/charge weight to an affected source or emissions unit, provided that:
    - the aluminum production weight, rather than feed/charge weight is measured and recorded for all emissions units within a SAPU; and
    - all calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.
8. [40 CFR 63.1510(e)]  
By March 24, 2003, the permittee of an affected source or emissions unit subject to an emission limit in kg/Mg (lb/ton) or g/Mg (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emissions unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emissions unit-by-emissions unit basis. As an alternative to a measurement device, the permittee may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emissions unit.
- The accuracy of the weight measurement device or procedure must be plus or minus 1 percent of the weight being measured. The permittee may apply to the Ohio EPA, Southeast District Office for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standard.
  - The permittee must 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.
9. [40 CFR 63.1512(k)]  
During the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the permittee of an affected source or emissions 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 emissions unit for each of the three test runs and calculate and record the total weight. A permittee that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emissions unit or affected source instead of the feed/charge weight.
10. [40 CFR 63.1512(o)]  
The permittee must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.
- Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15-minute period during the HCl and D/F 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.
  - Record the identity, composition, and total weight of each addition of solid reactive flux for the 3 test runs.
  - 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 the following equation:  
$$Wt = (F1)(W1) + (F2)(W2)$$

where:

Wt = total chlorine usage, by weight;  
F1 = fraction of gaseous or liquid flux that is chlorine;  
W1 = weight of reactive flux gas or liquid injected;  
F2 = fraction of solid reactive chloride flux that is chlorine (e.g., F = 0.75 for magnesium chloride); and  
W2 = weight of solid reactive flux.
  - Divide the weight of total chlorine usage (Wt) for the 3 test runs by the recorded measurement of the total weight of feed for the 3 test runs.
  - If a solid reactive flux other than magnesium chloride is used, the permittee must derive the appropriate proportion factor subject to approval by the Ohio EPA, Southeast District Office.
11. [40 CFR 63.1516(a)]  
By March 24, 2003, the permittee must develop and implement a written plan as described in 40 CFR 63.6 (e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The permittee shall also keep

- records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:
- a. procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
  - b. corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
12. [40 CFR 63.1517(a)]  
As required by 40 CFR 63.10(b), the permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart.
- a. The permittee must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.
  - b. The permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche.
  - c. The permittee may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.
13. [40 CFR 63.1517(b)]  
In addition to the general records required by 40 CFR 63.10(b), the permittee of a new or existing affected source (including an emissions unit in a secondary aluminum processing unit) must maintain records of:
- a. For each group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer, records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.
  - b. For each affected source and emissions unit subject to an emission standard in kg/Mg (lb/ton) of feed/charge, records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.
  - c. Records of monthly inspections for proper unit labeling for each affected source and emissions unit subject to labeling requirements.
  - d. Records of annual inspections of emission capture/collection and closed vent systems.
  - e. Records for any approved alternative monitoring or test procedure.
  - f. Current copies of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:
    - i. startup, shutdown, and malfunction plan;
    - ii. for major sources, OM&M plan; and
    - iii. site-specific secondary aluminum processing unit emission plan (if applicable).
  - g. For each secondary aluminum processing unit, records of total charge weight, or if the permittee chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.
14. [40 CFR 63.1510(t)]  
Except as provided in section A.III.15, the permittee must calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for each secondary aluminum processing unit on a daily basis. To calculate the 3-day, 24-hour rolling average, the permittee must:
- a. Calculate and record the total weight of material charged to each emissions unit in the secondary aluminum processing unit for each 24-hour day of operation using the feed/charge weight information required in 40 CFR 63.1510(e). If the permittee chooses to comply on the basis of weight of aluminum produced by the emissions unit, rather than weight of material charged to the emissions unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.
  - b. Multiply the total feed/charge weight to the emissions unit, or the weight of aluminum produced by the emissions unit, for each emissions unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emissions unit (as determined during the performance test) to provide emissions for each emissions unit for the 24-hour period, in pounds.
  - c. Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.
  - d. Compute the 24-hour daily emission rate using the equation in 40 CFR 63.1510(t)(4).
  - e. Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.
15. [40 CFR 63.1510(u)]  
As an alternative to the procedures of section A.III.14, the permittee may demonstrate, through performance tests, that each individual emissions unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emissions unit.

16. The permittee shall maintain monthly records of the following information:
- the hours the emissions unit was in operation;
  - the natural gas usage for each month, in cubic feet; and
  - the cumulative natural gas usage rate for each calendar year.

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**IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

The permittee shall also submit annual reports which specify the amount of natural gas used in this emissions unit during the previous calendar year. These reports shall be submitted by January 31 of each year.

2. [40 CFR 63.1515(b)]  
Each permittee must submit a notification of compliance status report within 60 days after the compliance dates specified in 40 CFR 63.1501. The notification must be signed by the responsible official who must certify its accuracy. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. The permittee must provide duplicate notification to the applicable Regional Administrator. If a permittee submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report must include:
- All information required in 40 CFR 63.9(h). The permittee must provide a complete performance test report for each affected source and emissions unit for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).
  - Unit labeling as described in 40 CFR 63.1506(b), including process type or furnace classification and operating requirements.
  - The compliant operating parameter value or range established for each affected source or emissions unit with supporting documentation and a description of the procedure used to establish the value (e.g., total reactive chlorine flux injection rate, including the operating cycle or time period used in the performance test.)
  - Approved OM&M plan (including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device).
  - Startup, shutdown, and malfunction plan, with revisions.
3. [40 CFR 63.1516(b)(1)]  
As required by 40 CFR 63.10(e)(3), the permittee must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). When no deviations of parameters have occurred, the permittee must submit a report stating that no excess emissions occurred during the reporting period.
- A report must be submitted if any of these conditions occur during a 6-month reporting period:
    - An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).
    - An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).
    - An affected source (including an emissions unit in a secondary aluminum processing unit) was not operated according to the requirements of this subpart.
    - A deviation from the 3-day, 24-hour rolling average emission limit for a secondary aluminum processing unit.
4. [40 CFR 63.1516(c)]  
For the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the permittee must certify continuing compliance based upon, but not limited to, the following conditions:
- any period of excess emissions, as defined in this section, that occurred during the year were reported as required by this section; and
  - all monitoring, record keeping, and reporting requirements were met during the year.
5. [40 CFR 63.1512(r)]  
The permittee of each group 1 furnace must submit the information described in 40 CFR 63.1515(b)(3) as part of the notification of compliance status report to document conformance with the operational standard in 40 CFR 63.1506(b).

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**V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
  - b. Emission Limitation:

0.141 pound of particulate emissions per ton of metal processed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirements specified in section A.V.2.
  - c. Emission Limitations:

0.6 pound of SO<sub>2</sub> per million cubic feet of natural gas consumed  
140 pounds of NO<sub>x</sub> per million cubic feet of natural gas consumed  
35 pounds of CO per million cubic feet of natural gas consumed  
5.8 pounds of OC per million cubic feet of natural gas consumed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission factors contained in AP-42, Fifth Edition, Section 1.4, Tables 1.4.1 and 1.4.2 (7/98) and the record keeping requirements contained in section A.III.2. If required, compliance with the above emission limitations may also be determined in accordance with 40 CFR Part 60, Appendix A, Methods 6, 7, 10, and 25.
  - d. Emission Limitation:

0.40 pound of particulate emissions per ton of feed/charge

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
  - e. Emission Limitation:

2.1 x 10<sup>-4</sup> gr of D/F TEQ per ton of feed/charge

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
  - f. Emission Limitation:

0.40 pound of HCl per ton of feed/charge

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 12 to 24 months after issuance of the permit and within 12 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office as required by 40 CFR 63.1515(a)(6). 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 emission test(s).

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.

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 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.

3. [40 CFR 63.1511(a)]  
Prior to conducting a performance test required by this section, the permittee must prepare and submit a site-specific test plan meeting the requirements in 40 CFR 63.7(c).
4. [40 CFR 63.1511(b)]  
Following approval of the site-specific test plan, the permittee must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected source and emissions unit, and report the results in the notification of compliance status report as described in 40 CFR 63.1515(b). The permittee must conduct each performance test according to the requirements of the general provisions in Subpart A of 40 CFR Part 63 and this permit.
  - a. The permittee must conduct each test while the affected source or emissions unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.
  - b. 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.
  - c. 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.
  - d. 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.
  - e. 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.
5. [40 CFR 63.1512(j)]  
The permittee must conduct performance tests as described below. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl and g TEQ/Mg of feed/charge for D/F emissions from each emission unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in 40 CFR 63.1510(t). A performance test is required for:
  - a. Each group 1 furnace processing only clean charge to measure emissions of PM and either:
    - i. emissions of HCl (for the emission limit); or
    - ii. the mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).
  - b. Each group 1 furnace that processes scrap other than clean charge to measure emissions of PM and D/F and either:
    - i. emissions of HCl (for the emission limit); or
    - ii. the mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).
  - c. Each in-line fluxer to measure emissions of PM and HCl.
6. [40 CFR 63.1511(c)]  
The permittee must use the following methods in Appendix A to 40 CFR Part 60 to determine compliance with the applicable emission limits or standards:
  - a. Method 1 for sample and velocity traverses.
  - b. Method 2 for velocity and volumetric flow rate.
  - c. Method 3 for gas analysis.
  - d. Method 4 for moisture content of the stack gas.
  - e. Method 5 for the concentration of PM.
  - f. Method 9 for visible emission observations.
  - g. Method 23 for the concentration of D/F.
  - h. Method 25A for the concentration of THC, as propane.
  - i. Method 26A for the concentration of HCl. Where a lime-injected fabric filter is used as the control device to comply with the 90 percent reduction standard, the permittee must measure the fabric filter inlet concentration of HCl at a point before lime is introduced to the system.
7. [40 CFR 63.1511(d)]

The permittee may use an alternative test method, subject to approval by the Administrator.

8. [40 CFR 63.1512(e)(3)]  
The permittee may choose to determine the rate of reactive flux addition to the group 1 furnace and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all reactive flux added to the group 1 furnace is emitted. Under these circumstances, the permittee is not required to conduct an emission test for HCl.
9. [40 CFR 63.1511(e)]  
The permittee of new or existing affected sources and emissions units located at secondary aluminum production facilities that are major sources must conduct a performance test every 5 years following the initial performance test.
10. [40 CFR 63.1511(f)]  
With the approval of the Ohio EPA, Southeast District Office, a single representative or similar group 1 furnace or in-line fluxer which is not controlled by an add-on control device may be tested to determine the emission rate of all like affected sources at a facility provided that:
- the tested emissions unit must use identical feed/charge and flux materials in the same proportions as the emission units that it represents;
  - the tested emissions unit is subject to the same work practices as the emissions units that it represents;
  - the tested emissions unit is of the same design as the emissions units that it represents;
  - the tested emissions unit is tested under the highest load or capacity reasonably expected to occur for any of the emissions units that it represents;
  - at least one of each different style of emissions unit at the facility is tested; and
  - all add-on control devices are tested.
11. [40 CFR 63.1513(b)]  
The following equation shall be used to determine compliance with an emission limit for PM, HCl, and D/F:
- $$E = (C \times Q \times K1) / P$$
- where:
- E = emission rate of particulates, HCl, or D/F, kg/Mg (lb/ton) of feed;  
C = concentration of particulates, HCl, or D/F, g/dscm (gr/dscf);  
Q = volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);  
K1 = conversion factor, 1 kg/1,000 g (1 lb/7,000 gr); and  
P = production rate, Mg/hr (ton/hr).
12. [40 CFR 63.1513(e)]  
The equation contained in 40 CFR 63.1513(e)(1) shall be used to determine compliance with the mass-weighted PM emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 1 in 40 CFR 63.1505(k).
- The equation contained in 40 CFR 63.1513(e)(2) shall be used to determine compliance with the aluminum mass-weighted HCl emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 2 in 40 CFR 63.1505(k).
- The equation contained in 40 CFR 63.1513(e)(3) shall be used to determine compliance with the aluminum mass-weighted D/F emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 3 in 40 CFR 63.1505(k).
- As an alternative to using the equations in this section, the permittee may demonstrate compliance for a secondary aluminum processing unit by demonstrating that each existing group 1 furnace is in compliance with the emission limits for a new group 1 furnace in 40 CFR 63.1505(i) and that each existing in-line fluxer is in compliance with the emission limits for a new in-line fluxer in 40 CFR 63.1505(j).

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VI. **Miscellaneous Requirements**

- None

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Facility ID: 0656000014 Emissions Unit ID: P010 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<b>2. Additional Terms and Conditions</b>		
1. None		

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. None

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0656000014 Emissions Unit ID: P012 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
90,000 lbs/hr E.W. Bliss Co. reduction mill	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 43.6 pounds per hour.

2. **Additional Terms and Conditions**

- (a) None

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- II. **Operational Restrictions**

1. None

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- III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

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- IV. **Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

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- V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible emission limit shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
  - b. Emission Limitation:
 

43.6 pounds per hour of particulate emissions

Applicable Compliance Method:

Compliance with this emission limitation is assumed based on a stack test performed on this emissions unit on August 27, 1975 which indicated an emission rate of 1.43 pounds per hour particulate emissions. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0656000014 Emissions Unit ID: P012 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0656000014 Emissions Unit ID: P013 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
90,000 lbs/hr Ingersoll Milling Machine Co. scalper	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 43.6 pounds per hour.

2. **Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

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**IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

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**V. Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
    - 20% opacity as a 6-minute average
    - Applicable Compliance Method:

Compliance with the visible emission limit shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

b. Emission Limitation:

43.6 pounds per hour of particulate emissions

Applicable Compliance Method:

Compliance with this emission limitation is assumed based on a stack test performed on this emissions unit on September 17, 1975 which indicated an emission rate of 4.56 pounds per hour particulate emissions. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0656000014 Emissions Unit ID: P013 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: P020 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired melt and hold furnace #9 - group 1 furnace with no controls	OAC rule 3745-31-05 (PTIs 17-023 and 17-1278)	2.2 pounds per hour of particulate emissions 9.6 tpy of particulate emissions
		0.05 pound per hour of sulfur dioxide (SO2) 0.22 tpy of SO2
		4.05 pounds per hour of nitrogen oxides (NOx) 17.75 tpy of NOx
		2.8 pounds per hour of carbon monoxide (CO) 11.92 tpy of CO
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	See A.I.2.a below.
	OAC rule 3745-18-06(E)	See A.I.2.a below.
	40 CFR Part 63, Subpart RRR	Upon the effective date of 40 CFR Part 63, Subpart RRR, this emissions unit is limited to the following in accordance with 40 CFR 63.1505(i):
		0.40 pound of particulates per ton of feed/charge from a group 1 furnace, that is not a melting/holding furnace processing only clean charge;
		2.1 x 10 <sup>-4</sup> gr of D/F TEQ (see A.I.2.b) per ton of feed/charge from a group 1 furnace, (this limit does not apply if the furnace processes only clean charge); and
		0.40 pound of hydrogen chloride (HCl) per ton of feed/charge.

2. **Additional Terms and Conditions**

- a. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.
- b. D/F means dioxins and furans. Dioxins and furans means tetra-, penta-, hexa-, and octachlorinated dibenzo dioxins and furans. TEQ means the international method of expressing toxicity equivalents for

dioxins and furans as defined in "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update" (EPA-625/3-89-016), available from the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, Virginia 22161, NTIS no. PB 90-145756.

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#### II. Operational Restrictions

1. [40 CFR 63.1506(n)]  
The permittee of a group 1 furnace (including a group 1 furnace that is part of a secondary aluminum processing unit) without add-on air pollution control devices must:
  - a. Maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test.
  - b. Operate each furnace in accordance with the work practice/pollution prevention measures documented in the OM&M plan and within the parameter values or ranges established in the OM&M plan.
  - c. Operate each group 1 melting/holding furnace subject to the emission standards in 40 CFR 63.1505(i)(2) using only clean charge as the feedstock.
2. [40 CFR 63.1506(b)]  
By March 24, 2003, the permittee must provide and maintain easily visible labels posted at each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln that identifies the applicable emission limits and means of compliance, including:
  - a. The type of affected source or emission unit (e.g., scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, in-line fluxer).
  - b. The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the operation, maintenance, and monitoring (OM&M) plan.
3. [40 CFR 63.1506(p)]  
When a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the performance test and incorporated in the OM&M plan, the permittee must initiate corrective action. Corrective action must restore operation of the affected source or emissions unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.
4. [40 CFR 63.1511(g)]  
By March 24, 2003, the permittee of the new or existing affected sources and emissions 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 permittee 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 permittee 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:
  - a. the complete emission test report(s) used as the basis of the parameter(s) is submitted;
  - b. the same test methods and procedures as required by this subpart were used in the test;
  - c. the permittee 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; and
  - d. all process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report.

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#### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
2. [40 CFR 63.1510(b)]  
The permittee must prepare and implement for each new or existing affected source and emissions unit, a written OM&M plan. By March 24, 2003, the permittee must submit the plan to the Ohio EPA, Southeast

District Office for review and approval as part of the application for a part 70 or part 71 permit. Any subsequent changes to the plan must be submitted to the Ohio EPA, Southeast District Office for review and approval. Pending approval by the Ohio EPA, Southeast District Office of an initial or amended plan, the owner or operator must comply with the provisions of the submitted plan. Each plan must contain the following information:

- a. Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
  - b. A monitoring schedule for each affected source and emissions unit.
  - c. Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR 63.1505.
  - d. Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
    - i. calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and
    - ii. procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in Subpart A of 40 CFR Part 63.
  - e. Procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
  - f. Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in this section, including:
    - i. procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and
    - ii. procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
  - g. A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
  - h. Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in 40 CFR 63.1510(o) for each group 1 furnace not equipped with an add-on air pollution control device.
3. [40 CFR 63.1510(s)]  
The permittee of a secondary aluminum processing unit at a facility must include, within the OM&M plan prepared in accordance with 40 CFR 63.1510(b), the following information:
- a. the identification of each emissions unit in the secondary aluminum processing unit;
  - b. the specific control technology or pollution prevention measure to be used for each emissions unit in the secondary aluminum processing unit and the date of its installation or application;
  - c. the emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;
  - d. information and data demonstrating compliance for each emissions unit with all applicable design, equipment, work practice or operational standards of this subpart; and
  - e. the monitoring requirements applicable to each emissions unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average (3-day, 24-hour rolling average means daily calculations of the average 24-hour emission rate over the 3 most recent consecutive 24-hour periods) using the procedure in 40 CFR 63.1510(t).
4. The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:
- a. any averaging among emissions of differing pollutants;
  - b. the inclusion of any affected sources other than emissions units in a secondary aluminum processing unit;
  - c. the inclusion of any emissions unit while it is shut down; or
  - d. the inclusion of any periods of startup, shutdown, or malfunction in emission calculations.
- To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the permittee must submit a request to the Ohio EPA, Southeast District Office containing the information required by paragraph (a) of this section and obtain approval of the Ohio EPA, Southeast District Office prior to implementing any revisions.
5. [40 CFR 63.1510(c)]  
The permittee must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.
6. [40 CFR 63.1510(j)]  
By March 24, 2003, the permittee must:
- a. Install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emissions unit.
    - i. The monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.
    - ii. The accuracy of the weight measurement device must be plus or minus 1% of the weight of the reactive component of the flux being measured. The permittee may apply to the Ohio EPA, Southeast District Office for permission to use a weight measurement device of alternative accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of plus or minus 1%

- impracticable. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards.
- iii. The permittee must 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.
- b. Calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - c. Record, for each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of:
    - i. gaseous or liquid reactive flux other than chlorine; and
    - ii. solid reactive flux.
  - d. Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - e. The permittee of a group 1 furnace or in-line fluxer performing reactive fluxing may apply to the Administrator for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis.
7. [40 CFR 63.1506(d)]  
By March 24, 2003, the permittee of each affected source or emissions unit subject to an emission limit in lb/ton of feed/charge must:
- a. Except as provided in paragraph (3) of this section, install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test.
  - b. Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
  - c. The permittee may choose to measure and record aluminum production weight from an affected source or emissions unit rather than feed/charge weight to an affected source or emissions unit, provided that:
    - i. the aluminum production weight, rather than feed/charge weight is measured and recorded for all emissions units within a SAPU; and
    - ii. all calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.
8. [40 CFR 63.1510(e)]  
By March 24, 2003, the permittee of an affected source or emissions unit subject to an emission limit in kg/Mg (lb/ton) or g/Mg (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emissions unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emissions unit-by-emissions unit basis. As an alternative to a measurement device, the permittee may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emissions unit.
- a. The accuracy of the weight measurement device or procedure must be plus or minus 1 percent of the weight being measured. The permittee may apply to the Ohio EPA, Southeast District Office for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standard.
  - b. The permittee must 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.
9. [40 CFR 63.1512(k)]  
During the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the permittee of an affected source or emissions 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 emissions unit for each of the three test runs and calculate and record the total weight. A permittee that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emissions unit or affected source instead of the feed/charge weight.
10. [40 CFR 63.1512(o)]  
The permittee must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.
- a. Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15-minute period during the HCl and D/F 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.
  - b. Record the identity, composition, and total weight of each addition of solid reactive flux for the 3 test runs.
  - c. 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 the following equation:

$$Wt = (F1)(W1) + (F2)(W2)$$

where:

Wt = total chlorine usage, by weight;

F1 = fraction of gaseous or liquid flux that is chlorine;

W1 = weight of reactive flux gas or liquid injected;

F2 = fraction of solid reactive chloride flux that is chlorine (e.g., F = 0.75 for magnesium chloride); and

W2 = weight of solid reactive flux.

d. Divide the weight of total chlorine usage (Wt) for the 3 test runs by the recorded measurement of the total weight of feed for the 3 test runs.

e. If a solid reactive flux other than magnesium chloride is used, the permittee must derive the appropriate proportion factor subject to approval by the Ohio EPA, Southeast District Office.

11. [40 CFR 63.1516(a)]

By March 24, 2003, the permittee must develop and implement a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:

a. procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and

b. corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.

12. [40 CFR 63.1517(a)]

As required by 40 CFR 63.10(b), the permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart.

a. The permittee must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.

b. The permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche.

c. The permittee may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.

13. [40 CFR 63.1517(b)]

In addition to the general records required by 40 CFR 63.10(b), the permittee of a new or existing affected source (including an emissions unit in a secondary aluminum processing unit) must maintain records of:

a. For each group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer, records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.

b. For each affected source and emissions unit subject to an emission standard in kg/Mg (lb/ton) of feed/charge, records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.

c. Records of monthly inspections for proper unit labeling for each affected source and emissions unit subject to labeling requirements.

d. Records of annual inspections of emission capture/collection and closed vent systems.

e. Records for any approved alternative monitoring or test procedure.

f. Current copies of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:

i. startup, shutdown, and malfunction plan;

ii. for major sources, OM&M plan; and

iii. site-specific secondary aluminum processing unit emission plan (if applicable).

g. For each secondary aluminum processing unit, records of total charge weight, or if the permittee chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.

14. [40 CFR 63.1510(t)]

Except as provided in section A.III.15, the permittee must calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for each secondary aluminum processing unit on a daily basis. To calculate the 3-day, 24-hour rolling average, the permittee must:

a. Calculate and record the total weight of material charged to each emissions unit in the secondary aluminum processing unit for each 24-hour day of operation using the feed/charge weight information required in 40 CFR 63.1510(e). If the permittee chooses to comply on the basis of weight of aluminum produced by the emissions unit, rather than weight of material charged to the emissions unit, all

performance test emissions results and all calculations must be conducted on the aluminum production weight basis.

- b. Multiply the total feed/charge weight to the emissions unit, or the weight of aluminum produced by the emissions unit, for each emissions unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emissions unit (as determined during the performance test) to provide emissions for each emissions unit for the 24-hour period, in pounds.
  - c. Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.
  - d. Compute the 24-hour daily emission rate using the equation in 40 CFR 63.1510(t)(4).
  - e. Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.
15. [40 CFR 63.1510(u)]  
As an alternative to the procedures of section A.III.14, the permittee may demonstrate, through performance tests, that each individual emissions unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emissions unit.
16. The permittee shall maintain monthly records of the following information:
- a. the hours the emissions unit was in operation;
  - b. the natural gas usage for each month, in cubic feet; and
  - c. the cumulative natural gas usage rate for each calendar year.

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#### IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. [40 CFR 63.1515(b)]  
Each permittee must submit a notification of compliance status report within 60 days after the compliance dates specified in 40 CFR 63.1501. The notification must be signed by the responsible official who must certify its accuracy. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. The permittee must provide duplicate notification to the applicable Regional Administrator. If a permittee submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report must include:
  - a. All information required in 40 CFR 63.9(h). The permittee must provide a complete performance test report for each affected source and emissions unit for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).
  - b. Unit labeling as described in 40 CFR 63.1506(b), including process type or furnace classification and operating requirements.
  - c. The compliant operating parameter value or range established for each affected source or emissions unit with supporting documentation and a description of the procedure used to establish the value (e.g., total reactive chlorine flux injection rate, including the operating cycle or time period used in the performance test.)
  - d. Approved OM&M plan (including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device).
  - e. Startup, shutdown, and malfunction plan, with revisions.
3. [40 CFR 63.1516(b)(1)]  
As required by 40 CFR 63.10(e)(3), the permittee must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). When no deviations of parameters have occurred, the permittee must submit a report stating that no excess emissions occurred during the reporting period.
  - a. A report must be submitted if any of these conditions occur during a 6-month reporting period:
    - i. An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).
    - ii. An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).
    - iii. An affected source (including an emissions unit in a secondary aluminum processing unit) was not operated according to the requirements of this subpart.
    - iv. A deviation from the 3-day, 24-hour rolling average emission limit for a secondary aluminum processing unit.

4. [40 CFR 63.1516(c)]  
For the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the permittee must certify continuing compliance based upon, but not limited to, the following conditions:
  - a. any period of excess emissions, as defined in this section, that occurred during the year were reported as required by this section; and
  - b. all monitoring, record keeping, and reporting requirements were met during the year.
5. [40 CFR 63.1512(r)]  
The permittee of each group 1 furnace must submit the information described in 40 CFR 63.1515(b)(3) as part of the notification of compliance status report to document conformance with the operational standard in 40 CFR 63.1506(b).

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**V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
20% opacity as a 6-minute average  
  
Applicable Compliance Method:  
  
Compliance with the visible particulate emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
  - b. Emission Limitations:  
  
2.2 pounds per hour of particulate emissions  
0.05 pound per hour of sulfur dioxide (SO<sub>2</sub>)  
4.05 pounds per hour of nitrogen oxides (NO<sub>x</sub>)  
2.8 pounds per hour of carbon monoxide (CO)  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon the emission factors contained in AP-42, Section 1.4, Tables 1.4.1 and 1.4.2 and the record keeping requirements contained in section A.III.2. If required, compliance with the above emission limitations may also be determined in accordance with 40 CFR Part 60, Appendix A, Methods 5, 6, 7, 10, and 25.
  - c. Emission Limitations:  
  
9.6 tpy of particulate emissions  
0.22 tpy of SO<sub>2</sub>  
17.75 tpy of NO<sub>x</sub>  
11.92 tpy of CO  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated by multiplying the hourly allowable emission rate, in lbs/hr, by the actual annual operation hours, in hrs/yr, and then dividing by 2000 lbs/ton.
  - d. Emission Limitation:  
  
0.40 pound of particulate emissions per ton of feed/charge  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
  - e. Emission Limitation:  
  
2.1 x 10<sup>-4</sup> gr of D/F TEQ per ton of feed/charge  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
  - f. Emission Limitation:

- 0.40 pound of HCl per ton of feed/charge
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted within 12 to 24 months after issuance of the permit and within 12 months prior to permit expiration.
  - The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - 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 Ohio EPA, Southeast District Office. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office as required by 40 CFR 63.1515(a)(6). 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 emission test(s).
- 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.
- 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 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.
3. [40 CFR 63.1511(a)]  
Prior to conducting a performance test required by this section, the permittee must prepare and submit a site-specific test plan meeting the requirements in 40 CFR 63.7(c).
4. [40 CFR 63.1511(b)]  
Following approval of the site-specific test plan, the permittee must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected source and emissions unit, and report the results in the notification of compliance status report as described in 40 CFR 63.1515(b). The permittee must conduct each performance test according to the requirements of the general provisions in Subpart A of 40 CFR Part 63 and this permit.
- The permittee must conduct each test while the affected source or emissions unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.
  - 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.
  - 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.
  - 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.
  - 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.
5. [40 CFR 63.1512(j)]  
The permittee must conduct performance tests as described below. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl and g TEQ/Mg of feed/charge for D/F emissions from each emission unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in 40 CFR 63.1510(t). A performance test is required for:
- Each group 1 furnace processing only clean charge to measure emissions of PM and either:
    - emissions of HCl (for the emission limit); or
    - the mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).
  - Each group 1 furnace that processes scrap other than clean charge to measure emissions of PM and D/F and either:
    - emissions of HCl (for the emission limit); or

- ii. the mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).
- c. Each in-line fluxer to measure emissions of PM and HCl.
6. [40 CFR 63.1511(c)]  
The permittee must use the following methods in Appendix A to 40 CFR Part 60 to determine compliance with the applicable emission limits or standards:
- Method 1 for sample and velocity traverses.
  - Method 2 for velocity and volumetric flow rate.
  - Method 3 for gas analysis.
  - Method 4 for moisture content of the stack gas.
  - Method 5 for the concentration of PM.
  - Method 9 for visible emission observations.
  - Method 23 for the concentration of D/F.
  - Method 25A for the concentration of THC, as propane.
  - Method 26A for the concentration of HCl. Where a lime-injected fabric filter is used as the control device to comply with the 90 percent reduction standard, the permittee must measure the fabric filter inlet concentration of HCl at a point before lime is introduced to the system.
7. [40 CFR 63.1511(d)]  
The permittee may use an alternative test method, subject to approval by the Administrator.
8. [40 CFR 63.1512(e)(3)]  
The permittee may choose to determine the rate of reactive flux addition to the group 1 furnace and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all reactive flux added to the group 1 furnace is emitted. Under these circumstances, the permittee is not required to conduct an emission test for HCl.
9. [40 CFR 63.1511(e)]  
The permittee of new or existing affected sources and emissions units located at secondary aluminum production facilities that are major sources must conduct a performance test every 5 years following the initial performance test.
10. [40 CFR 63.1511(f)]  
With the approval of the Ohio EPA, Southeast District Office, a single representative or similar group 1 furnace or in-line fluxer which is not controlled by an add-on control device may be tested to determine the emission rate of all like affected sources at a facility provided that:
- the tested emissions unit must use identical feed/charge and flux materials in the same proportions as the emission units that it represents;
  - the tested emissions unit is subject to the same work practices as the emissions units that it represents;
  - the tested emissions unit is of the same design as the emissions units that it represents;
  - the tested emissions unit is tested under the highest load or capacity reasonably expected to occur for any of the emissions units that it represents;
  - at least one of each different style of emissions unit at the facility is tested; and
  - all add-on control devices are tested.
11. [40 CFR 63.1513(b)]  
The following equation shall be used to determine compliance with an emission limit for PM, HCl, and D/F:
- $$E = (C \times Q \times K1) / P$$
- where:
- E = emission rate of particulates, HCl, or D/F, kg/Mg (lb/ton) of feed;  
 C = concentration of particulates, HCl, or D/F, g/dscm (gr/dscf);  
 Q = volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);  
 K1 = conversion factor, 1 kg/1,000 g (1 lb/7,000 gr); and  
 P = production rate, Mg/hr (ton/hr).
12. [40 CFR 63.1513(e)]  
The equation contained in 40 CFR 63.1513(e)(1) shall be used to determine compliance with the mass-weighted PM emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 1 in 40 CFR 63.1505(k).
- The equation contained in 40 CFR 63.1513(e)(2) shall be used to determine compliance with the aluminum mass-weighted HCl emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 2 in 40 CFR 63.1505(k).
- The equation contained in 40 CFR 63.1513(e)(3) shall be used to determine compliance with the aluminum mass-weighted D/F emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 3 in 40 CFR 63.1505(k).
- As an alternative to using the equations in this section, the permittee may demonstrate compliance for a secondary aluminum processing unit by demonstrating that each existing group 1 furnace is in compliance

with the emission limits for a new group 1 furnace in 40 CFR 63.1505(i) and that each existing in-line fluxer is in compliance with the emission limits for a new in-line fluxer in 40 CFR 63.1505(j).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0656000014 Emissions Unit ID: P020 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<b>2. Additional Terms and Conditions</b>		
1. None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0656000014 Emissions Unit ID: P021 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired melt and hold furnace #3 - group 1 furnace with no controls	OAC rule 3745-31-05 (PTI 17-024) OAC rule 3745-17-07(A)	See A.I.2.a below.  Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1) OAC rule 3745-18-06(E)(2) 40 CFR Part 63, Subpart RRR	40.5 pounds per hour of particulate emissions 306.1 pounds per hour of sulfur dioxide (SO2) Upon the effective date of 40 CFR Part 63, Subpart RRR, this emissions unit is limited to the following in accordance with 40 CFR 63.1505(i):  0.40 pound of particulates per ton of feed/charge from a group 1 furnace, that is not a melting/holding furnace processing only clean charge;  2.1 x 10 <sup>-4</sup> gr of D/F TEQ (see A.I.2.b) per ton of feed/charge from a group 1 furnace, (this limit does not apply if the furnace processes only clean charge); and  0.40 pound of hydrogen chloride (HCl) per ton of feed/charge.

2. Additional Terms and Conditions

- a. The best available technology determination was determined to be compliance with all applicable rules.
- b. D/F means dioxins and furans. Dioxins and furans means tetra-, penta-, hexa-, and octachlorinated dibenzo dioxins and furans. TEQ means the international method of expressing toxicity equivalents for dioxins and furans as defined in "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update" (EPA-625/3-89-016), available from the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, Virginia 22161, NTIS no. PB 90-145756.

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II. Operational Restrictions

1. [40 CFR 63.1506(n)]  
The permittee of a group 1 furnace (including a group 1 furnace that is part of a secondary aluminum processing unit) without add-on air pollution control devices must:
  - a. Maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test.
  - b. Operate each furnace in accordance with the work practice/pollution prevention measures documented in the OM&M plan and within the parameter values or ranges established in the OM&M plan.
  - c. Operate each group 1 melting/holding furnace subject to the emission standards in 40 CFR 63.1505(i)(2) using only clean charge as the feedstock.
2. [40 CFR 63.1506(b)]  
By March 24, 2003, the permittee must provide and maintain easily visible labels posted at each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln that identifies the applicable emission limits and means of compliance, including:

- a. The type of affected source or emission unit (e.g., scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, in-line fluxer).
- b. The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the operation, maintenance, and monitoring (OM&M) plan.
3. [40 CFR 63.1506(p)]  
When a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the performance test and incorporated in the OM&M plan, the permittee must initiate corrective action. Corrective action must restore operation of the affected source or emissions unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.
4. [40 CFR 63.1511(g)]  
By March 24, 2003, the permittee of the new or existing affected sources and emissions 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 permittee 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 permittee 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:
- the complete emission test report(s) used as the basis of the parameter(s) is submitted;
  - the same test methods and procedures as required by this subpart were used in the test;
  - the permittee 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; and
  - all process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report.

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### III. Monitoring and/or Record Keeping Requirements

- The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - the color of the emissions;
  - whether the emissions are representative of normal operations;
  - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - the total duration of any visible emission incident; and
  - any corrective actions taken to eliminate the visible emissions.
- [40 CFR 63.1510(b)]  
The permittee must prepare and implement for each new or existing affected source and emissions unit, a written OM&M plan. By March 24, 2003, the permittee must submit the plan to the Ohio EPA, Southeast District Office for review and approval as part of the application for a part 70 or part 71 permit. Any subsequent changes to the plan must be submitted to the Ohio EPA, Southeast District Office for review and approval. Pending approval by the Ohio EPA, Southeast District Office of an initial or amended plan, the owner or operator must comply with the provisions of the submitted plan. Each plan must contain the following information:
  - Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
  - A monitoring schedule for each affected source and emissions unit.
  - Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR 63.1505.
  - Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
    - calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and
    - procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in Subpart A of 40 CFR Part 63.
  - Procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
  - Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in this section, including:

- i. procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and
  - ii. procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
- g. A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
- h. Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in 40 CFR 63.1510(o) for each group 1 furnace not equipped with an add-on air pollution control device.
3. [40 CFR 63.1510(s)]  
The permittee of a secondary aluminum processing unit at a facility must include, within the OM&M plan prepared in accordance with 40 CFR 63.1510(b), the following information:
- a. the identification of each emissions unit in the secondary aluminum processing unit;
  - b. the specific control technology or pollution prevention measure to be used for each emissions unit in the secondary aluminum processing unit and the date of its installation or application;
  - c. the emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;
  - d. information and data demonstrating compliance for each emissions unit with all applicable design, equipment, work practice or operational standards of this subpart; and
  - e. the monitoring requirements applicable to each emissions unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average (3-day, 24-hour rolling average means daily calculations of the average 24-hour emission rate over the 3 most recent consecutive 24-hour periods) using the procedure in 40 CFR 63.1510(t).
4. The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:
- a. any averaging among emissions of differing pollutants;
  - b. the inclusion of any affected sources other than emissions units in a secondary aluminum processing unit;
  - c. the inclusion of any emissions unit while it is shut down; or
  - d. the inclusion of any periods of startup, shutdown, or malfunction in emission calculations.
- To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the permittee must submit a request to the Ohio EPA, Southeast District Office containing the information required by paragraph (a) of this section and obtain approval of the Ohio EPA, Southeast District Office prior to implementing any revisions.
5. [40 CFR 63.1510(c)]  
The permittee must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.
6. [40 CFR 63.1510(j)]  
By March 24, 2003, the permittee must:
- a. Install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emissions unit.
    - i. The monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.
    - ii. The accuracy of the weight measurement device must be plus or minus 1% of the weight of the reactive component of the flux being measured. The permittee may apply to the Ohio EPA, Southeast District Office for permission to use a weight measurement device of alternative accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of plus or minus 1% impracticable. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards.
    - iii. The permittee must 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.
  - b. Calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - c. Record, for each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of:
    - i. gaseous or liquid reactive flux other than chlorine; and
    - ii. solid reactive flux.
  - d. Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - e. The permittee of a group 1 furnace or in-line fluxer performing reactive fluxing may apply to the Administrator for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis.
7. [40 CFR 63.1506(d)]  
By March 24, 2003, the permittee of each affected source or emissions unit subject to an emission limit in lb/ton of feed/charge must:

- a. Except as provided in paragraph (3) of this section, install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test.
- b. Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
- c. The permittee may choose to measure and record aluminum production weight from an affected source or emissions unit rather than feed/charge weight to an affected source or emissions unit, provided that:
- the aluminum production weight, rather than feed/charge weight is measured and recorded for all emissions units within a SAPU; and
  - all calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.
8. [40 CFR 63.1510(e)]  
By March 24, 2003, the permittee of an affected source or emissions unit subject to an emission limit in kg/Mg (lb/ton) or g/Mg (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emissions unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emissions unit-by-emissions unit basis. As an alternative to a measurement device, the permittee may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emissions unit.
- The accuracy of the weight measurement device or procedure must be plus or minus 1 percent of the weight being measured. The permittee may apply to the Southeast District Office for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standard.
  - The permittee must 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.
9. [40 CFR 63.1512(k)]  
During the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the permittee of an affected source or emissions 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 emissions unit for each of the three test runs and calculate and record the total weight. A permittee that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emissions unit or affected source instead of the feed/charge weight.
10. [40 CFR 63.1512(o)]  
The permittee must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.
- Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15-minute period during the HCl and D/F 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.
  - Record the identity, composition, and total weight of each addition of solid reactive flux for the 3 test runs.
  - 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 the following equation:  
$$Wt = (F1)(W1) + (F2)(W2)$$
where:  
Wt = total chlorine usage, by weight;  
F1 = fraction of gaseous or liquid flux that is chlorine;  
W1 = weight of reactive flux gas or liquid injected;  
F2 = fraction of solid reactive chloride flux that is chlorine (e.g., F = 0.75 for magnesium chloride); and  
W2 = weight of solid reactive flux.
  - Divide the weight of total chlorine usage (Wt) for the 3 test runs by the recorded measurement of the total weight of feed for the 3 test runs.
  - If a solid reactive flux other than magnesium chloride is used, the permittee must derive the appropriate proportion factor subject to approval by the Ohio EPA, Southeast District Office.
11. [40 CFR 63.1516(a)]  
By March 24, 2003, the permittee must develop and implement a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:
- procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and

- b. corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
12. [40 CFR 63.1517(a)]  
As required by 40 CFR 63.10(b), the permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart.
- a. The permittee must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.
- b. The permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche.
- c. The permittee may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.
13. [40 CFR 63.1517(b)]  
In addition to the general records required by 40 CFR 63.10(b), the permittee of a new or existing affected source (including an emissions unit in a secondary aluminum processing unit) must maintain records of:
- a. For each group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer, records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.
- b. For each affected source and emissions unit subject to an emission standard in kg/Mg (lb/ton) of feed/charge, records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.
- c. Records of monthly inspections for proper unit labeling for each affected source and emissions unit subject to labeling requirements.
- d. Records of annual inspections of emission capture/collection and closed vent systems.
- e. Records for any approved alternative monitoring or test procedure.
- f. Current copies of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:
- i. startup, shutdown, and malfunction plan;
- ii. for major sources, OM&M plan; and
- iii. site-specific secondary aluminum processing unit emission plan (if applicable).
- g. For each secondary aluminum processing unit, records of total charge weight, or if the permittee chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.
14. [40 CFR 63.1510(t)]  
Except as provided in section A.III.15, the permittee must calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for each secondary aluminum processing unit on a daily basis. To calculate the 3-day, 24-hour rolling average, the permittee must:
- a. Calculate and record the total weight of material charged to each emissions unit in the secondary aluminum processing unit for each 24-hour day of operation using the feed/charge weight information required in 40 CFR 63.1510(e). If the permittee chooses to comply on the basis of weight of aluminum produced by the emissions unit, rather than weight of material charged to the emissions unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.
- b. Multiply the total feed/charge weight to the emissions unit, or the weight of aluminum produced by the emissions unit, for each emissions unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emissions unit (as determined during the performance test) to provide emissions for each emissions unit for the 24-hour period, in pounds.
- c. Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.
- d. Compute the 24-hour daily emission rate using the equation in 40 CFR 63.1510(t)(4).
- e. Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.
15. [40 CFR 63.1510(u)]  
As an alternative to the procedures of section A.III.14, the permittee may demonstrate, through performance tests, that each individual emissions unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emissions unit.

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IV. **Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. [40 CFR 63.1515(b)]  
Each permittee must submit a notification of compliance status report within 60 days after the compliance dates specified in 40 CFR 63.1501. The notification must be signed by the responsible official who must certify its accuracy. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. The permittee must provide duplicate notification to the applicable Regional Administrator. If a permittee submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report must include:
  - a. All information required in 40 CFR 63.9(h). The permittee must provide a complete performance test report for each affected source and emissions unit for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).
  - b. Unit labeling as described in 40 CFR 63.1506(b), including process type or furnace classification and operating requirements.
  - c. The compliant operating parameter value or range established for each affected source or emissions unit with supporting documentation and a description of the procedure used to establish the value (e.g., total reactive chlorine flux injection rate, including the operating cycle or time period used in the performance test.)
  - d. Approved OM&M plan (including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device).
  - e. Startup, shutdown, and malfunction plan, with revisions.
3. [40 CFR 63.1516(b)(1)]  
As required by 40 CFR 63.10(e)(3), the permittee must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). When no deviations of parameters have occurred, the permittee must submit a report stating that no excess emissions occurred during the reporting period.
  - a. A report must be submitted if any of these conditions occur during a 6-month reporting period:
    - i. An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).
    - ii. An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).
    - iii. An affected source (including an emissions unit in a secondary aluminum processing unit) was not operated according to the requirements of this subpart.
    - iv. A deviation from the 3-day, 24-hour rolling average emission limit for a secondary aluminum processing unit.
4. [40 CFR 63.1516(c)]  
For the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the permittee must certify continuing compliance based upon, but not limited to, the following conditions:
  - a. any period of excess emissions, as defined in this section, that occurred during the year were reported as required by this section; and
  - b. all monitoring, record keeping, and reporting requirements were met during the year.
5. [40 CFR 63.1512(r)]  
The permittee of each group 1 furnace must submit the information described in 40 CFR 63.1515(b)(3) as part of the notification of compliance status report to document conformance with the operational standard in 40 CFR 63.1506(b).

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

- b. Emission Limitation:
- 40.5 pounds per hour of particulate emissions
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the emission factors contained in AP-42, Section 1.4, Tables 1.4.1 and 1.4.2 and the record keeping requirements contained in section A.III.14. If required, compliance with the above emission limitation may also be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.
- c. Emission Limitation:
- 306.1 pounds per hour of SO<sub>2</sub>
- Applicable Compliance Method:
- Compliance with this emission limitation shall be assumed due to the negligible percent sulfur, by weight, in the fuel. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 6.
- d. Emission Limitation:
- 0.40 pound of particulate emissions per ton of feed/charge
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
- e. Emission Limitation:
- 2.1 x 10<sup>-4</sup> gr of D/F TEQ per ton of feed/charge
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
- f. Emission Limitation:
- 0.40 pound of HCl per ton of feed/charge
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 12 to 24 months after issuance of the permit and within 12 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office as required by 40 CFR 63.1515(a)(6). 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 emission test(s).
- 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.
- 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 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.

3. [40 CFR 63.1511(a)]  
Prior to conducting a performance test required by this section, the permittee must prepare and submit a site-specific test plan meeting the requirements in 40 CFR 63.7(c).
4. [40 CFR 63.1511(b)]  
Following approval of the site-specific test plan, the permittee must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected source and emissions unit, and report the results in the notification of compliance status report as described in 40 CFR 63.1515(b). The permittee must conduct each performance test according to the requirements of the general provisions in Subpart A of 40 CFR Part 63 and this permit.
  - a. The permittee must conduct each test while the affected source or emissions unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.
  - b. 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.
  - c. 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.
  - d. 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.
  - e. 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.
5. [40 CFR 63.1512(j)]  
The permittee must conduct performance tests as described below. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl and g TEQ/Mg of feed/charge for D/F emissions from each emission unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in 40 CFR 63.1510(t). A performance test is required for:
  - a. Each group 1 furnace processing only clean charge to measure emissions of PM and either:
    - i. emissions of HCl (for the emission limit); or
    - ii. the mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).
  - b. Each group 1 furnace that processes scrap other than clean charge to measure emissions of PM and D/F and either:
    - i. emissions of HCl (for the emission limit); or
    - ii. the mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).
  - c. Each in-line fluxer to measure emissions of PM and HCl.
6. [40 CFR 63.1511(c)]  
The permittee must use the following methods in Appendix A to 40 CFR Part 60 to determine compliance with the applicable emission limits or standards:
  - a. Method 1 for sample and velocity traverses.
  - b. Method 2 for velocity and volumetric flow rate.
  - c. Method 3 for gas analysis.
  - d. Method 4 for moisture content of the stack gas.
  - e. Method 5 for the concentration of PM.
  - f. Method 9 for visible emission observations.
  - g. Method 23 for the concentration of D/F.
  - h. Method 25A for the concentration of THC, as propane.
  - i. Method 26A for the concentration of HCl. Where a lime-injected fabric filter is used as the control device to comply with the 90 percent reduction standard, the permittee must measure the fabric filter inlet concentration of HCl at a point before lime is introduced to the system.
7. [40 CFR 63.1511(d)]  
The permittee may use an alternative test method, subject to approval by the Administrator.
8. [40 CFR 63.1512(e)(3)]  
The permittee may choose to determine the rate of reactive flux addition to the group 1 furnace and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all reactive flux added to the group 1 furnace is emitted. Under these circumstances, the permittee is not required to conduct an emission test for HCl.
9. [40 CFR 63.1511(e)]  
The permittee of new or existing affected sources and emissions units located at secondary aluminum production facilities that are major sources must conduct a performance test every 5 years following the initial performance test.
10. [40 CFR 63.1511(f)]  
With the approval of the Ohio EPA, Southeast District Office, a single representative or similar group 1 furnace or in-line fluxer which is not controlled by an add-on control device may be tested to determine the emission rate of all like affected sources at a facility provided that:

- a. the tested emissions unit must use identical feed/charge and flux materials in the same proportions as the emission units that it represents;
- b. the tested emissions unit is subject to the same work practices as the emissions units that it represents;
- c. the tested emissions unit is of the same design as the emissions units that it represents;
- d. the tested emissions unit is tested under the highest load or capacity reasonably expected to occur for any of the emissions units that it represents;
- e. at least one of each different style of emissions unit at the facility is tested; and
- f. all add-on control devices are tested.

11. [40 CFR 63.1513(b)]  
The following equation shall be used to determine compliance with an emission limit for PM, HCl, and D/F:

$$E = (C \times Q \times K1) / P$$

where:

E = emission rate of particulates, HCl, or D/F, kg/Mg (lb/ton) of feed;  
C = concentration of particulates, HCl, or D/F, g/dscm (gr/dscf);  
Q = volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);  
K1 = conversion factor, 1 kg/1,000 g (1 lb/7,000 gr); and  
P = production rate, Mg/hr (ton/hr).

12. [40 CFR 63.1513(e)]  
The equation contained in 40 CFR 63.1513(e)(1) shall be used to determine compliance with the mass-weighted PM emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 1 in 40 CFR 63.1505(k).

The equation contained in 40 CFR 63.1513(e)(2) shall be used to determine compliance with the aluminum mass-weighted HCl emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 2 in 40 CFR 63.1505(k).

The equation contained in 40 CFR 63.1513(e)(3) shall be used to determine compliance with the aluminum mass-weighted D/F emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 3 in 40 CFR 63.1505(k).

As an alternative to using the equations in this section, the permittee may demonstrate compliance for a secondary aluminum processing unit by demonstrating that each existing group 1 furnace is in compliance with the emission limits for a new group 1 furnace in 40 CFR 63.1505(i) and that each existing in-line fluxer is in compliance with the emission limits for a new in-line fluxer in 40 CFR 63.1505(j).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: P021 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

- |   | <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|--------------------------------------|--|
| 2. <b>Additional Terms and Conditions</b> |   |                                      |  |
| 1. None                                   |   |                                      |  |

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: P022 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired melt and hold furnace #1 - group 1 furnace with no controls	OAC rule 3745-31-05 (PTIs 17-451 and 17-1202)	2.2 pounds per hour of particulate emissions 9.6 tpy of particulate emissions
		0.05 pound per hour of sulfur dioxide (SO2) 0.205 tpy of SO2
		3.29 pounds per hour of nitrogen oxides (NOx) 39.0 tpy of NOx

2.8 pounds per hour of carbon monoxide (CO)  
11.92 tpy of CO

OAC rule 3745-17-07(A)

See A.II.1 below.

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

OAC rule 3745-17-11(B)

See A.I.2.a below.

OAC rule 3745-18-06(E)

See A.I.2.a below.

40 CFR Part 63, Subpart RRR

Upon the effective date of 40 CFR Part 63, Subpart RRR, this emissions unit is limited to the following in accordance with 40 CFR 63.1505(i):

0.40 pound of particulates per ton of feed/charge from a group 1 furnace, that is not a melting/holding furnace processing only clean charge;

2.1 x 10<sup>-4</sup> gr of D/F TEQ (see A.I.2.b) per ton of feed/charge from a group 1 furnace, (this limit does not apply if the furnace processes only clean charge); and

0.40 pound of hydrogen chloride (HCl) per ton of feed/charge.

**2. Additional Terms and Conditions**

- a. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.
- b. D/F means dioxins and furans. Dioxins and furans means tetra-, penta-, hexa-, and octachlorinated dibenzo dioxins and furans. TEQ means the international method of expressing toxicity equivalents for dioxins and furans as defined in "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzop-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update" (EPA-625/3-89-016), available from the National Technical Information Service (NTIS), 5285 Port Royal Road, Springfield, Virginia 22161, NTIS no. PB 90-145756.

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**II. Operational Restrictions**

- 1. [40 CFR 63.1506(n)]  
The permittee of a group 1 furnace (including a group 1 furnace that is part of a secondary aluminum processing unit) without add-on air pollution control devices must:
  - a. Maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test.
  - b. Operate each furnace in accordance with the work practice/pollution prevention measures documented in the OM&M plan and within the parameter values or ranges established in the OM&M plan.
  - c. Operate each group 1 melting/holding furnace subject to the emission standards in 40 CFR 63.1505(i)(2) using only clean charge as the feedstock.
- 2. [40 CFR 63.1506(b)]  
By March 24, 2003, the permittee must provide and maintain easily visible labels posted at each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln that identifies the applicable emission limits and means of compliance, including:
  - a. The type of affected source or emission unit (e.g., scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, in-line fluxer).
  - b. The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the operation, maintenance, and monitoring (OM&M) plan.
- 3. [40 CFR 63.1506(p)]  
When a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the performance test and incorporated in the OM&M plan, the permittee must initiate corrective action. Corrective action must restore operation of the affected source or emissions unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.
- 4. [40 CFR 63.1511(g)]  
By March 24, 2003, the permittee of the new or existing affected sources and emissions 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 permittee 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 permittee 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:

- a. the complete emission test report(s) used as the basis of the parameter(s) is submitted;
  - b. the same test methods and procedures as required by this subpart were used in the test;
  - c. the permittee 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; and
  - d. all process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report.
5. The permittee shall burn no more than 650 million cubic feet of natural gas in this emissions unit per rolling, 365-day period.

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### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
2. [40 CFR 63.1510(b)]
 

The permittee must prepare and implement for each new or existing affected source and emissions unit, a written OM&M plan. By March 24, 2003, the permittee must submit the plan to the Ohio EPA, Southeast District Office for review and approval as part of the application for a part 70 or part 71 permit. Any subsequent changes to the plan must be submitted to the Ohio EPA, Southeast District Office for review and approval. Pending approval by the Ohio EPA, Southeast District Office of an initial or amended plan, the owner or operator must comply with the provisions of the submitted plan. Each plan must contain the following information:

  - a. Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
  - b. A monitoring schedule for each affected source and emissions unit.
  - c. Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR 63.1505.
  - d. Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
    - i. calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and
    - ii. procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in Subpart A of 40 CFR Part 63.
  - e. Procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
  - f. Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in this section, including:
    - i. procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and
    - ii. procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
  - g. A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
  - h. Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in 40 CFR 63.1510(o) for each group 1 furnace not equipped with an add-on air pollution control device.

3. [40 CFR 63.1510(s)]  
The permittee of a secondary aluminum processing unit at a facility must include, within the OM&M plan prepared in accordance with 40 CFR 63.1510(b), the following information:
- the identification of each emissions unit in the secondary aluminum processing unit;
  - the specific control technology or pollution prevention measure to be used for each emissions unit in the secondary aluminum processing unit and the date of its installation or application;
  - the emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;
  - information and data demonstrating compliance for each emissions unit with all applicable design, equipment, work practice or operational standards of this subpart; and
  - the monitoring requirements applicable to each emissions unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average (3-day, 24-hour rolling average means daily calculations of the average 24-hour emission rate over the 3 most recent consecutive 24-hour periods) using the procedure in 40 CFR 63.1510(t).
4. The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:
- any averaging among emissions of differing pollutants;
  - the inclusion of any affected sources other than emissions units in a secondary aluminum processing unit;
  - the inclusion of any emissions unit while it is shut down; or
  - the inclusion of any periods of startup, shutdown, or malfunction in emission calculations.
- To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the permittee must submit a request to the Ohio EPA, Southeast District Office containing the information required by paragraph (a) of this section and obtain approval of the Ohio EPA, Southeast District Office prior to implementing any revisions.
5. [40 CFR 63.1510(c)]  
The permittee must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.
6. [40 CFR 63.1510(j)]  
By March 24, 2003, the permittee must:
- Install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emissions unit.
    - The monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.
    - The accuracy of the weight measurement device must be plus or minus 1% of the weight of the reactive component of the flux being measured. The permittee may apply to the Ohio EPA, Southeast District Office for permission to use a weight measurement device of alternative accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of plus or minus 1% impracticable. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards.
    - The permittee must 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.
  - Calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - Record, for each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of:
    - gaseous or liquid reactive flux other than chlorine; and
    - solid reactive flux.
  - Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - The permittee of a group 1 furnace or in-line fluxer performing reactive fluxing may apply to the Administrator for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis.
7. [40 CFR 63.1506(d)]  
By March 24, 2003, the permittee of each affected source or emissions unit subject to an emission limit in lb/ton of feed/charge must:
- Except as provided in paragraph (3) of this section, install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test.
  - Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
  - The permittee may choose to measure and record aluminum production weight from an affected source or emissions unit rather than feed/charge weight to an affected source or emissions unit, provided that:
    - the aluminum production weight, rather than feed/charge weight is measured and recorded for all emissions units within a SAPU; and

- ii. all calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.
8. [40 CFR 63.1510(e)]  
By March 24, 2003, the permittee of an affected source or emissions unit subject to an emission limit in kg/Mg (lb/ton) or g/Mg (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emissions unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emissions unit-by-emissions unit basis. As an alternative to a measurement device, the permittee may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emissions unit.
- a. The accuracy of the weight measurement device or procedure must be plus or minus 1 percent of the weight being measured. The permittee may apply to the Ohio EPA, Southeast District Office for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standard.
- b. The permittee must 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.
9. [40 CFR 63.1512(k)]  
During the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the permittee of an affected source or emissions 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 emissions unit for each of the three test runs and calculate and record the total weight. A permittee that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emissions unit or affected source instead of the feed/charge weight.
10. [40 CFR 63.1512(o)]  
The permittee must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.
- a. Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15-minute period during the HCl and D/F 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.
- b. Record the identity, composition, and total weight of each addition of solid reactive flux for the 3 test runs.
- c. 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 the following equation:
- $$Wt = (F1)(W1) + (F2)(W2)$$
- where:
- Wt = total chlorine usage, by weight;  
F1 = fraction of gaseous or liquid flux that is chlorine;  
W1 = weight of reactive flux gas or liquid injected;  
F2 = fraction of solid reactive chloride flux that is chlorine (e.g., F = 0.75 for magnesium chloride); and  
W2 = weight of solid reactive flux.
- d. Divide the weight of total chlorine usage (Wt) for the 3 test runs by the recorded measurement of the total weight of feed for the 3 test runs.
- e. If a solid reactive flux other than magnesium chloride is used, the permittee must derive the appropriate proportion factor subject to approval by the Ohio EPA, Southeast District Office.
11. [40 CFR 63.1516(a)]  
By March 24, 2003, the permittee must develop and implement a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:
- a. procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
- b. corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
12. [40 CFR 63.1517(a)]  
As required by 40 CFR 63.10(b), the permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart.
- a. The permittee must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.

- b. The permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche.
- c. The permittee may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.
13. [40 CFR 63.1517(b)]  
In addition to the general records required by 40 CFR 63.10(b), the permittee of a new or existing affected source (including an emissions unit in a secondary aluminum processing unit) must maintain records of:
- a. For each group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer, records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.
- b. For each affected source and emissions unit subject to an emission standard in kg/Mg (lb/ton) of feed/charge, records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.
- c. Records of monthly inspections for proper unit labeling for each affected source and emissions unit subject to labeling requirements.
- d. Records of annual inspections of emission capture/collection and closed vent systems.
- e. Records for any approved alternative monitoring or test procedure.
- f. Current copies of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:
- i. startup, shutdown, and malfunction plan;
- ii. for major sources, OM&M plan; and
- iii. site-specific secondary aluminum processing unit emission plan (if applicable).
- g. For each secondary aluminum processing unit, records of total charge weight, or if the permittee chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.
14. [40 CFR 63.1510(t)]  
Except as provided in section A.III.15, the permittee must calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for each secondary aluminum processing unit on a daily basis. To calculate the 3-day, 24-hour rolling average, the permittee must:
- a. Calculate and record the total weight of material charged to each emissions unit in the secondary aluminum processing unit for each 24-hour day of operation using the feed/charge weight information required in 40 CFR 63.1510(e). If the permittee chooses to comply on the basis of weight of aluminum produced by the emissions unit, rather than weight of material charged to the emissions unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.
- b. Multiply the total feed/charge weight to the emissions unit, or the weight of aluminum produced by the emissions unit, for each emissions unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emissions unit (as determined during the performance test) to provide emissions for each emissions unit for the 24-hour period, in pounds.
- c. Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.
- d. Compute the 24-hour daily emission rate using the equation in 40 CFR 63.1510(t)(4).
- e. Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.
15. [40 CFR 63.1510(u)]  
As an alternative to the procedures of section A.III.14, the permittee may demonstrate, through performance tests, that each individual emissions unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emissions unit.
16. The permittee shall maintain daily records of the following information:
- a. the hours the emissions unit was in operation;
- b. the natural gas usage, in cubic feet; and
- c. the natural gas usage for the rolling, 365-day period.

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#### IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the

previous 6-month period.

2. [40 CFR 63.1515(b)]  
Each permittee must submit a notification of compliance status report within 60 days after the compliance dates specified in 40 CFR 63.1501. The notification must be signed by the responsible official who must certify its accuracy. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. The permittee must provide duplicate notification to the applicable Regional Administrator. If a permittee submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report must include:
  - a. All information required in 40 CFR 63.9(h). The permittee must provide a complete performance test report for each affected source and emissions unit for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).
  - b. Unit labeling as described in 40 CFR 63.1506(b), including process type or furnace classification and operating requirements.
  - c. The compliant operating parameter value or range established for each affected source or emissions unit with supporting documentation and a description of the procedure used to establish the value (e.g., total reactive chlorine flux injection rate, including the operating cycle or time period used in the performance test.)
  - d. Approved OM&M plan (including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device).
  - e. Startup, shutdown, and malfunction plan, with revisions.
3. [40 CFR 63.1516(b)(1)]  
As required by 40 CFR 63.10(e)(3), the permittee must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in Part 63.10(c). When no deviations of parameters have occurred, the permittee must submit a report stating that no excess emissions occurred during the reporting period.
  - a. A report must be submitted if any of these conditions occur during a 6-month reporting period:
    - i. An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).
    - ii. An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).
    - iii. An affected source (including an emissions unit in a secondary aluminum processing unit) was not operated according to the requirements of this subpart.
    - iv. A deviation from the 3-day, 24-hour rolling average emission limit for a secondary aluminum processing unit.
4. [40 CFR 63.1516(c)]  
For the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the permittee must certify continuing compliance based upon, but not limited to, the following conditions:
  - a. any period of excess emissions, as defined in this section, that occurred during the year were reported as required by this section; and
  - b. all monitoring, record keeping, and reporting requirements were met during the year.
5. [40 CFR 63.1512(r)]  
The permittee of each group 1 furnace must submit the information described in 40 CFR 63.1515(b)(3) as part of the notification of compliance status report to document conformance with the operational standard in 40 CFR 63.1506(b).

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#### V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
  - b. Emission Limitations:
 

2.2 pounds per hour of particulate emissions

- 0.05 pounds per hour of SO<sub>2</sub>  
 3.29 pounds per hour of NO<sub>x</sub>  
 2.8 pounds per hour of CO
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the emission factors contained in AP-42, Section 1.4, Tables 1.4.1 and 1.4.2 and the record keeping requirements contained in section A.III.14. If required, compliance with the above emission limitations may also be determined in accordance with 40 CFR Part 60, Appendix A, Methods 5, 6, 7, and 10.
- c. Emission Limitations:
- 9.6 tpy of particulate emissions  
 0.205 tpy of SO<sub>2</sub>  
 39.0 tpy of NO<sub>x</sub>  
 11.92 tpy of CO
- Applicable Compliance Method:
- Compliance shall be demonstrated by multiplying the hourly allowable emission rate, in lbs/hr, by the actual annual operation hours, in hrs/yr, and then dividing by 2000 lbs/ton.
- d. Emission Limitation:
- 0.40 pound of particulate emissions per ton of feed/charge
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
- e. Emission Limitation:
- 2.1 x 10<sup>-4</sup> gr of D/F TEQ per ton of feed/charge
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
- f. Emission Limitation:
- 0.40 pound of HCl per ton of feed/charge
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.3 through A.V.10.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted within 12 to 24 months after issuance of the permit and within 12 months prior to permit expiration.
  - The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - 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 Ohio EPA, Southeast District Office.  
 Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office as required by 40 CFR 63.1515(a)(6). 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 emission test(s).
- 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.
- 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 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.

3. [40 CFR 63.1511(a)]  
Prior to conducting a performance test required by this section, the permittee must prepare and submit a site-specific test plan meeting the requirements in 40 CFR 63.7(c).
4. [40 CFR 63.1511(b)]  
Following approval of the site-specific test plan, the permittee must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected source and emissions unit, and report the results in the notification of compliance status report as described in 40 CFR 63.1515(b). The permittee must conduct each performance test according to the requirements of the general provisions in Subpart A of 40 CFR Part 63 and this permit.
  - a. The permittee must conduct each test while the affected source or emissions unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.
  - b. 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.
  - c. 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.
  - d. 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.
  - e. 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.
5. [40 CFR 63.1512(j)]  
The permittee must conduct performance tests as described below. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl and g TEQ/Mg of feed/charge for D/F emissions from each emission unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in 40 CFR Part 63.1510 (t). A performance test is required for:
  - a. Each group 1 furnace processing only clean charge to measure emissions of PM and either:
    - i. emissions of HCl (for the emission limit); or
    - ii. the mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).
  - b. Each group 1 furnace that processes scrap other than clean charge to measure emissions of PM and D/F and either:
    - i. emissions of HCl (for the emission limit); or
    - ii. the mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).
  - c. Each in-line fluxer to measure emissions of PM and HCl.
6. [40 CFR 63.1511(c)]  
The permittee must use the following methods in Appendix A to 40 CFR Part 60 to determine compliance with the applicable emission limits or standards:
  - a. Method 1 for sample and velocity traverses.
  - b. Method 2 for velocity and volumetric flow rate.
  - c. Method 3 for gas analysis.
  - d. Method 4 for moisture content of the stack gas.
  - e. Method 5 for the concentration of PM.
  - f. Method 9 for visible emission observations.
  - g. Method 23 for the concentration of D/F.
  - h. Method 25A for the concentration of THC, as propane.
  - i. Method 26A for the concentration of HCl. Where a lime-injected fabric filter is used as the control device to comply with the 90 percent reduction standard, the permittee must measure the fabric filter inlet concentration of HCl at a point before lime is introduced to the system.
7. [40 CFR 63.1511(d)]  
The permittee may use an alternative test method, subject to approval by the Administrator.
8. [40 CFR 63.1512(e)(3)]  
The permittee may choose to determine the rate of reactive flux addition to the group 1 furnace and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all reactive flux added to the group 1 furnace is emitted. Under these circumstances, the permittee is not required to conduct an emission test for HCl.
9. [40 CFR 63.1511(e)]  
The permittee of new or existing affected sources and emissions units located at secondary aluminum production facilities that are major sources must conduct a performance test every 5 years following the initial performance test.
10. [40 CFR 63.1511(f)]  
With the approval of the Ohio EPA, Southeast District Office, a single representative or similar group 1 furnace or in-line fluxer which is not controlled by an add-on control device may be tested to determine the emission rate of all like affected sources at a facility provided that:

- a. the tested emissions unit must use identical feed/charge and flux materials in the same proportions as the emission units that it represents;
- b. the tested emissions unit is subject to the same work practices as the emissions units that it represents;
- c. the tested emissions unit is of the same design as the emissions units that it represents;
- d. the tested emissions unit is tested under the highest load or capacity reasonably expected to occur for any of the emissions units that it represents;
- e. at least one of each different style of emissions unit at the facility is tested; and
- f. all add-on control devices are tested.

11. [40 CFR 63.1513(b)]  
The following equation shall be used to determine compliance with an emission limit for PM, HCl, and D/F:

$$E = (C \times Q \times K1) / P$$

where:

E = emission rate of particulates, HCl, or D/F, kg/Mg (lb/ton) of feed;  
 C = concentration of particulates, HCl, or D/F, g/dscm (gr/dscf);  
 Q = volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);  
 K1 = conversion factor, 1 kg/1,000 g (1 lb/7,000 gr); and  
 P = production rate, Mg/hr (ton/hr).

12. [40 CFR 63.1513(e)]  
The equation contained in 40 CFR 63.1513(e)(1) shall be used to determine compliance with the mass-weighted PM emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 1 in 40 CFR 63.1505(k).

The equation contained in 40 CFR 63.1513(e)(2) shall be used to determine compliance with the aluminum mass-weighted HCl emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 2 in 40 CFR 63.1505(k).

The equation contained in 40 CFR 63.1513(e)(3) shall be used to determine compliance with the aluminum mass-weighted D/F emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 3 in 40 CFR 63.1505(k).

As an alternative to using the equations in this section, the permittee may demonstrate compliance for a secondary aluminum processing unit by demonstrating that each existing group 1 furnace is in compliance with the emission limits for a new group 1 furnace in 40 CFR 63.1505(i) and that each existing in-line fluxer is in compliance with the emission limits for a new in-line fluxer in 40 CFR 63.1505(j).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: P022 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

- |    | <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|----|---|--------------------------------------|--|
| 2. | <b>Additional Terms and Conditions</b>        |                                      |  |
| 1. | None  |                                      |  |

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: P023 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
96" reversing hot mill	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. Particulate emissions shall not exceed 47.05 pounds per hour.
	OAC rule 3745-17-11(B)(1)	

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

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IV. **Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
20% opacity as a 6-minute average  
Applicable Compliance Method:  
Compliance with the visible emission limit shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
  - b. Emission Limitation:  
47.05 pounds per hour of particulate emissions  
Applicable Compliance Method:  
Compliance with this emission limitation is determined based on a stack test performed on a similar emissions unit on August 27, 1975 which indicated an emission rate of 1.43 pounds per hour of particulates. When the result of this test is extrapolated to compare with this emissions unit, an emission rate of 0.54 pounds per hour of particulates is demonstrated. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: P023 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<b>2. Additional Terms and Conditions</b>		
1. None		

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. None

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0656000014 Emissions Unit ID: P024 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<b>Operations, Property, and/or Equipment</b>	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
natural gas-fired pusher furnace #1	OAC rule 3745-31-05 (PTIs 17-062 and 17-651)	5 pounds of particulate emissions per million cubic feet of natural gas consumed
		0.6 pound of sulfur dioxide (SO <sub>2</sub> ) per million cubic feet of natural gas consumed
		140 pounds of nitrogen oxides (NO <sub>x</sub> ) per million cubic feet of natural gas consumed
		35 pounds of carbon monoxide (CO) per million cubic feet of natural gas consumed
		5.8 pounds of organic compounds (OC) per million cubic feet of natural gas consumed
		See A.II.1 below. none
	OAC rule 3745-17-07(A)	See A.I.2.b below. none
	OAC rule 3745-17-11(B)	See A.I.2.a below.
	OAC rule 3745-18-06(E)	See A.I.2.c below.

2. **Additional Terms and Conditions**

- a. The uncontrolled mass rate of particulate emissions 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 of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- c. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.

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II. **Operational Restrictions**

1. The permittee shall burn no more than 228,110,400 cubic feet of natural gas in this emissions unit per calendar year.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain monthly records of the following information:
  - a. the natural gas usage for each month; and
  - b. the cumulative natural gas usage rate for each calendar year.

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IV. **Reporting Requirements**

1. The permittee shall submit annual reports which specify the amount of natural gas used in this emissions unit during the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitations:

- 5 pounds of particulate emissions per million cubic feet of natural gas consumed
- 0.6 pound of SO<sub>2</sub> per million cubic feet of natural gas consumed
- 140 pounds of NO<sub>x</sub> per million cubic feet of natural gas consumed
- 35 pounds of CO per million cubic feet of natural gas consumed
- 5.8 pounds of OC per million cubic feet of natural gas consumed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission factors contained in AP-42, Fifth Edition, Section 1.4, Tables 1.4.1 and 1.4.2 (7/98) and the record keeping requirements contained in section A.III.1. If required, compliance with the above emission limitations may also be determined in accordance with 40 CFR Part 60, Appendix A, Methods 5, 6, 7, 10, and 25.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0656000014 Emissions Unit ID: P024 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0656000014 Emissions Unit ID: P025 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired pusher furnace #2	OAC rule 3745-31-05 (PTI 17-063)	See A.II.1 below.
	OAC rule 3745-17-07(A)	none
	OAC rule 3745-17-11(B)	See A.I.2.b below. none
	OAC rule 3745-18-06(E)(2)	See A.I.2.a below. 92.8 pounds per hour of sulfur dioxide (SO2)

**2. Additional Terms and Conditions**

- a. The uncontrolled mass rate of particulate emissions 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 of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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II. **Operational Restrictions**

1. The permittee shall burn no more than 260,697,600 cubic feet of natural gas in this emissions unit per calendar year.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain monthly records of the following information:
  - a. the natural gas usage for each month; and
  - b. the cumulative natural gas usage rate for each calendar year.

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IV. **Reporting Requirements**

1. The permittee shall submit annual reports which specify the amount of natural gas used in this emissions unit during the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. **Testing Requirements**

1. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:
 

92.8 pounds per hour of SO2

Applicable Compliance Method:

Compliance with this emission limitation shall be assumed due to the negligible percent sulfur, by weight, in the fuel. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 6.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: P025 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>		
1. None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0656000014 Emissions Unit ID: P026 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
80" three stand hot mill	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 47.05 pounds per hour.

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

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IV. **Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible emission limit shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
  - b. Emission Limitation:
 

47.05 pounds per hour of particulate emissions

Applicable Compliance Method:

Compliance with this emission limitation is determined based on a stack test performed on a similar emissions unit on August 27, 1975 which indicated an emission rate of 1.43 pounds per hour of particulate emissions. When the result of this test is extrapolated to compare with this emissions unit, an emission rate of 3.60 pounds per hour of particulate emissions is demonstrated. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: P026 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. None

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0656000014 Emissions Unit ID: P032 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired pusher furnace #3	OAC rule 3745-31-05 (PTI 17-325)	5.0 tpy of particulate emissions
	OAC rule 3745-17-07(A)	3.0 tpy of sulfur dioxide (SO2) none
	OAC rule 3745-17-11(B)	See A.I.2.b below. none
	OAC rule 3745-18-06(E)(2)	See A.I.2.a below. 237.1 pounds per hour of SO2

**2. Additional Terms and Conditions**

- a. The uncontrolled mass rate of particulate emissions 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 of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as

defined in OAC rule 3745-17-01(B)(14), is equal to zero.

- b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain monthly records of the following information:
  - a. the natural gas usage for each month; and
  - b. the cumulative natural gas usage rate for each calendar year.

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
237.1 pounds per hour of SO<sub>2</sub>  
  
Applicable Compliance Method:  
  
Compliance with this emission limitation shall be assumed due to the negligible percent sulfur, by weight, in the fuel. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 6.
  - b. Emission Limitations:  
  
5.0 tpy of particulate emissions  
3.0 tpy of SO<sub>2</sub>  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated by multiplying the appropriate emission factor contained in AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (7/98) by the amount of natural gas burned per calendar year as recorded in section A.III.1.b, and then dividing by 2000 lbs/ton.

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**VI. Miscellaneous Requirements**

1. None

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**Facility ID: 0656000014 Emissions Unit ID: P032 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<b>2. Additional Terms and Conditions</b>		
1. None		

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. None

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: P033 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
SMS mill	OAC rule 3745-31-05 (PTI 17-091) OAC rule 3745-17-07(A)	See A.I.2.a below.  Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	45.5 pounds per hour of particulate emissions
<b>2. Additional Terms and Conditions</b>		
a. The best available technology determination was determined to be compliance with all applicable rules.		

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

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**IV. Reporting Requirements**

- 1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

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**V. Testing Requirements**

- 1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
    - 20% opacity as a 6-minute average
    - Applicable Compliance Method:
      - Compliance with the visible particulate emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
  - b. Emission Limitation:
    - 45.5 pounds per hour of particulate emissions
    - Applicable Compliance Method:
      - Compliance with this emission limitation is assumed based on a stack test performed on this emissions unit on August 27, 1975 which indicated an emission rate of 1.43 pounds per hour of particulate emissions. If required, compliance with the above emission limitation may also be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: P033 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0656000014 Emissions Unit ID: P036 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
natural gas-fired pusher furnace #4	OAC rule 3745-31-05 (PTI 17-733)	5 pounds of particulate emissions per million cubic feet of natural gas consumed  0.6 pound of sulfur dioxide (SO2) per million cubic feet of natural gas consumed  140 pounds of nitrogen oxides (NOx) per million cubic feet of natural gas consumed  35 pounds of carbon monoxide (CO) per million cubic feet of natural gas consumed  5.8 pounds of organic compounds (OC) per million cubic feet of natural gas consumed
	OAC rule 3745-17-07(A)	none
	OAC rule 3745-17-11(B)	See A.I.2.b below. none
		See A.I.2.a below.
	OAC rule 3745-18-06(E)	See A.I.2.c below.

**2. Additional Terms and Conditions**

- a. The uncontrolled mass rate of particulate emissions 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 of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- c. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall maintain monthly records of the following information:
  - a. the natural gas usage for each month, in cubic feet; and
  - b. the cumulative natural gas usage rate for each calendar year.

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**IV. Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

- a. Emission Limitations:

- 5 pounds of particulate emissions per million cubic feet of natural gas consumed
    - 0.6 pound of SO2 per million cubic feet of natural gas consumed
    - 140 pounds of NOx per million cubic feet of natural gas consumed
    - 35 pounds of CO per million cubic feet of natural gas consumed
    - 5.8 pounds of OC per million cubic feet of natural gas consumed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission factors contained in AP-42, Fifth Edition, Section 1.4, Tables 1.4.1 and 1.4.2 (7/98) and the record keeping requirements contained in section A.III.1. If required, compliance with the above emission limitations may also be determined in accordance with 40 CFR Part 60, Appendix A, Methods 5, 6, 7, 10, and 25.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0656000014 Emissions Unit ID: P036 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0656000014 Emissions Unit ID: P037 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Hy-Cast degassing pit #5 - in-line fluxer with no controls	OAC rule 3745-31-05 (PTI 17-872)	This emissions unit is limited to 1.44 lbs/hr of particulate emissions and 3.15 lbs/hr of hydrogen chloride (HCl). (These emission limitations are less stringent than those contained in 40 CFR Part 63, Subpart RRR, and shall cease to be in effect upon the effective compliance date of Subpart RRR - Secondary Aluminum MACT.)
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 63, Subpart RRR	Upon the effective date of 40 CFR Part 63, Subpart RRR, this emissions unit is limited to the following per 40 CFR 63.1505(j):
		0.01 pound of particulate emissions per ton of feed/charge
		0.04 pound of HCl per ton of feed/charge
		The permittee may determine the emission standards for a secondary aluminum processing unit (SAPU) by applying the in-line fluxer limits on the basis of the aluminum production weight in each in-line fluxer, rather than on the basis of feed/charge.

2. **Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. [40 CFR 63.1506(b)]

By March 24, 2003, the permittee must provide and maintain easily visible labels posted at each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln that identifies the applicable emission limits and means of compliance, including:

  - a. The type of affected source or emissions unit (e.g., scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, in-line fluxer).
  - b. The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the operation, maintenance, and monitoring (OM&M) plan.
2. [40 CFR 63.1506(d)]

The permittee of each affected source or emissions unit subject to an emission limit in kg/Mg (lb/ton) of feed/charge must:

  - a. Install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test.
  - b. Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
  - c. The permittee may chose to measure and record aluminum production weight from an affected source or emissions unit rather than feed/charge weight to an affected source or emissions unit, provided that:
    - i. the aluminum production weight, rather than feed/charge weight is measured and recorded for all emissions units within a SAPU; and
    - ii. all calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.
3. [40 CFR 63.1511(g)]

By March 24, 2003, the permittee of the new or existing affected sources and emissions 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 permittee 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 permittee 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 Ohio EPA, Southeast District Office:

  - a. the complete emission test report(s) used as the basis of the parameter(s) is submitted;
  - b. the same test methods and procedures as required by this subpart were used in the test;
  - c. the permittee 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; and
  - d. all process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report.

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**III. Monitoring and/or Record Keeping Requirements**

1. [40 CFR 63.1510(b)]

The permittee must prepare and implement for each new or existing affected source and emission unit, a written OM&M plan. By March 24, 2003, the permittee must submit the plan to the Ohio EPA, Southeast District Office for review and approval as part of the application for a Part 70 or Part 71 permit. Any subsequent changes to the plan must be submitted to the Ohio EPA, Southeast District Office for review and approval. Pending approval by the Ohio EPA, Southeast District Office of an initial or amended plan, the permittee must comply with the provisions of the submitted plan. Each plan must contain the following information:

  - a. Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
  - b. A monitoring schedule for each affected source and emissions unit.
  - c. Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR 63.1505.
  - d. Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
    - i. calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and
    - ii. procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in Subpart A of 40 CFR Part 63.

- e. Procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
  - f. Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in this section, including:
    - i. procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and
    - ii. procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
  - g. A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
2. [40 CFR 63.1510(s)]  
The permittee of a secondary aluminum processing unit at a facility must include, within the OM&M plan prepared in accordance with 40 CFR 63.1510(b), the following information:
- a. the identification of each emissions unit in the secondary aluminum processing unit;
  - b. the specific control technology or pollution prevention measure to be used for each emissions unit in the secondary aluminum processing unit and the date of its installation or application;
  - c. the emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;
  - d. information and data demonstrating compliance for each emissions unit with all applicable design, equipment, work practice or operational standards of this subpart; and
  - e. the monitoring requirements applicable to each emissions unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average (3-day, 24-hour rolling average means daily calculations of the average 24-hour emission rate over the 3 most recent consecutive 24-hour periods) using the procedure in 40 CFR 63.1510(t).
3. The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:
- a. any averaging among emissions of differing pollutants;
  - b. the inclusion of any affected sources other than emissions units in a secondary aluminum processing unit;
  - c. the inclusion of any emissions unit while it is shut down; or
  - d. the inclusion of any periods of startup, shutdown, or malfunction in emission calculations.
- To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the permittee must submit a request to the Ohio EPA, Southeast District Office containing the information required in section A.III.2 and obtain approval of the Ohio EPA, Southeast District Office prior to implementing any revisions.
4. [40 CFR 63.1510(c)]  
The permittee must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.
5. [40 CFR 63.1510(j)]  
By March 24, 2003, the permittee must:
- a. Install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emissions unit.
    - i. the monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.
    - ii. the accuracy of the weight measurement device must be plus/minus 1 percent of the weight of the reactive component of the flux being measured. The permittee may apply to the Ohio EPA, Southeast District Office for permission to use a weight measurement device of alternative accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of plus/minus 1 percent impracticable. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards.
    - iii. the permittee must 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.
  - b. Calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - c. Record for each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of:
    - i. gaseous or liquid reactive flux other than chlorine; and
    - ii. solid reactive flux.
  - d. Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - e. The permittee of a group 1 furnace or in-line fluxer performing reactive fluxing may apply to the

- Administrator for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis.
6. [40 CFR 63.1510(e)]  
By March 24, 2003, the permittee of an affected source or emissions unit subject to an emission limit in kg/Mg (lb/ton) or g/Mg (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emissions unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emissions unit-by-emissions unit basis. As an alternative to a measurement device, the permittee may use a procedure acceptable to the Ohio EPA, Southeast District Office to determine the total weight of feed/charge or aluminum production to the affected source or emissions unit.
- a. The accuracy of the weight measurement device or procedure must be +1 percent of the weight being measured. The permittee may apply to the Ohio EPA, Southeast District Office for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standard.
- b. The permittee must 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.
7. [40 CFR 63.1512(o)]  
The permittee must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.
- a. Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15 minute period during the HCl and D/F 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.
- b. Record the identity, composition, and total weight of each addition of solid reactive flux for the 3 test runs.
- c. 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 the following equation:
- $$Wt = F1W1 + F2W2$$
- where:
- Wt = total chlorine usage, by weight;  
F1 = fraction of gaseous or liquid flux that is chlorine;  
W1 = weight of reactive flux gas or liquid injected;  
F2 = fraction of solid reactive chloride flux that is chlorine (e.g., F = 0.75 for magnesium chloride; and  
W2 = weight of solid reactive flux.
- d. Divide the weight of total chlorine usage (Wt) for the 3 test runs by the recorded measurement of the total weight of feed for the 3 test runs.
- e. If a solid reactive flux other than magnesium chloride is used, the permittee must derive the appropriate proportion factor subject to approval by the Ohio EPA, Southeast District Office.
8. [40 CFR 63.1516(a)]  
By March 24, 2003, the permittee must develop and implement a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:
- a. procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
- b. corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
9. [40 CFR 63.1517(a)]  
As required by 40 CFR 63.10(b), the permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart.
- a. The permittee must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.
- b. The permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche.
- c. The permittee may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.
10. [40 CFR 63.1517(b)]  
In addition to the general records required by 40 CFR 63.10(b), the permittee of a new or existing affected

source (including an emissions unit in a secondary aluminum processing unit) must maintain records of:

- a. for each group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer, records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken;
  - b. for each affected source and emissions unit subject to an emission standard in kg/Mg (lb/ton) of feed/charge, records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test;
  - c. records of monthly inspections for proper unit labeling for each affected source and emissions unit subject to labeling requirements;
  - d. records of annual inspections of emission capture/collection and closed vent systems;
  - e. records of any approved alternative monitoring or test procedure;
  - f. current copies of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:
    - i. startup, shutdown, and malfunction plan;
    - ii. for major sources, OM&M plan; and
    - iii. site-specific secondary aluminum processing unit emission plan (if applicable); and
  - g. for each secondary aluminum processing unit, records of total charge weight, or if the permittee chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.
11. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
12. [40 CFR 63.1510(w)]  
The permittee may submit an application to the Administrator for approval of alternate monitoring requirements to demonstrate compliance with the emission standards of this subpart, subject to the provisions of paragraphs (a) through (f) of this section.
- a. The Administrator will not approve averaging periods other than those specified in this section.
  - b. The permittee must continue to use the original monitoring requirement until necessary data are submitted and approval is received to use another monitoring procedure.
  - c. The permittee shall submit the application for approval of alternate monitoring methods no later than the notification of the performance test. The application must contain the information specified in sections A.III.12.c.i through A.III.12.c.iii:
    - i. data or information justifying the request, such as the technical or economic infeasibility, or the impracticality of using the required approach;
    - ii. a description of the proposed alternative monitoring requirements, including the operating parameters to be monitored, the monitoring approach and technique, and how the limit is to be calculated; and
    - iii. data and information documenting that the alternative monitoring requirement(s) would provide equivalent or better assurance of compliance with the relevant emission standard(s).
  - d. The Administrator will not approve an alternate monitoring application unless it would provide equivalent or better assurance of compliance with the relevant emission standard(s). Before disapproving any alternate monitoring application, the Administrator will provide:
    - i. notice of the information and findings upon which the intended disapproval is based; and
    - ii. notice of opportunity for the permittee to present additional supporting information before final action is taken on the application (This notice will specify how much additional time is allowed for the permittee to provide additional supporting information.).
  - e. The permittee is responsible for submitting any supporting information in a timely manner to enable the Administrator to consider the application prior to the performance test. Neither submittal of an application nor the Administrator's failure to approve or disapprove the application relieves the permittee of the responsibility to comply with any provisions of this subpart.
  - f. The Administrator may decide at any time, on a case-by-case basis, that additional or alternative operating limits, or alternative approaches to establishing operating limits, are necessary to demonstrate compliance with the emission standards of this subpart.
13. [40 CFR 63.1510(t)]  
Except as provided in section A.III.14, the permittee must calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for each secondary aluminum processing unit on a daily basis. To calculate the 3-day, 24-hour rolling average, the permittee must:
- a. Calculate and record the total weight of material charged to each emissions unit in the secondary aluminum processing unit for each 24-hour day of operation using the feed/charge weight information

- required in 40 CFR 63.1510(e). If the permittee chooses to comply on the basis of weight of aluminum produced by the emissions unit, rather than weight of material charged to the emissions unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.
- b. Multiply the total feed/charge weight to the emissions unit, or the weight of aluminum produced by the emissions unit, for each emissions unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emissions unit (as determined during the performance test) to provide emissions for each emissions unit for the 24-hour period, in pounds.
  - c. Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.
  - d. Compute the 24-hour daily emission rate using the equation in 40 CFR 63.1510(t)(4).
  - e. Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.
14. [40 CFR 63.1510(u)]  
As an alternative to the procedures of section A.III.13, the permittee may demonstrate, through performance tests, that each individual emissions unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emissions unit.

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#### IV. Reporting Requirements

1. [40 CFR 63.1515(b)]  
Each permittee must submit a notification of compliance status report within 60 days after the compliance dates specified in 40 CFR 63.1501. The notification must be signed by the responsible official who must certify its accuracy. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. The permittee must provide duplicate notification to the applicable Regional Administrator. If a permittee submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report must include:
  - a. All information required in 40 CFR 63.9(h). The permittee must provide a complete performance test report for each affected source and emissions unit for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).
  - b. Unit labeling as described in 40 CFR 63.1506(b), including process type or furnace classification and operating requirements.
  - c. The compliant operating parameter value or range established for each affected source or emissions unit with supporting documentation and a description of the procedure used to establish the value (e.g., total reactive chlorine flux injection rate), including the operating cycle or time period used in the performance test.
  - d. Approved OM&M plan (including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device).
  - e. Startup, shutdown, and malfunction plan, with revisions.
2. [40 CFR 63.1516(b)(1)]  
As required by 40 CFR 63.10(e)(3), the permittee must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). When no deviations of parameters have occurred, the permittee must submit a report stating that no excess emissions occurred during the reporting period.
  - a. A report must be submitted if any of these conditions occur during a 6-month reporting period:
    - i. an excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter);
    - ii. an action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3);
    - iii. an affected source (including an emissions unit in a secondary aluminum processing unit) was not operated according to the requirements of this subpart; and/or
    - iv. a deviation from the 3-day, 24-hour rolling average emission limit for a secondary aluminum processing unit.
3. [40 CFR 63.1516(c)]  
For the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the permittee must certify continuing compliance based upon, but not limited to, the following conditions:
  - a. any period of excess emissions, as defined in this section, that occurred during the year were reported as required by this section; and
  - b. all monitoring, record keeping, and reporting requirements were met during the year.
4. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the

previous 6-month period.

5. [40 CFR 63.1512(r)]  
The permittee of each scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, and in-line fluxer must submit the information described in 40 CFR 63.1515(b)(3) as part of the notification of compliance status report to document conformance with the operational standard in 40 CFR 63.1506(b).

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible emission limit shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
  - b. Emission Limitation:
 

1.44 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.2 through A.V.11.
  - c. Emission Limitation:
 

3.15 lbs/hr of HCl

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.2 through A.V.11.
  - d. Emission Limitation:
 

0.01 pound of particulate emissions per ton of feed/charge

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.2 through A.V.11.
  - e. Emission Limitation:
 

0.04 pound of HCl per ton of feed/charge

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.2 through A.V.11.
2. [40 CFR 63.1511(a)] and [40 CFR 63.1512(h)]
 

The permittee must conduct a performance test to measure emissions of HCl and PM. The permittee may choose to determine the rate of reactive flux addition to the in-line fluxer and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all reactive flux added to the in-line fluxer is emitted. Under these circumstances, the permittee is not required to conduct an emission test for HCl. Prior to conducting a performance test required by this permit, the permittee must prepare and submit a site-specific test plan meeting the requirements in 40 CFR 63.7(c).

[40 CFR 63.1515(a)(6)]  
As required by 40 CFR 63.9(e) and (f), the permittee must provide notification of the anticipated date for conducting performance tests and visible emission observations. The permittee must notify the Ohio EPA, Southeast District Office of the intent to conduct a performance test at least 60 days before the performance test is scheduled; notification of opacity or visible emission observations for a performance test must be provided at least 30 days before the observations are scheduled to take place.
3. [40 CFR 63.1511(b)]
 

Following approval of the site-specific test plan, the permittee must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected source and

- emissions unit, and report the results in the notification of compliance status report as described in 40 CFR 63.1515 (b). The permittee must conduct each performance test according to the requirements of the general provisions in Subpart A of 40 CFR Part 63 and this subpart.
- a. The permittee must conduct each test while the affected source or emissions unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.
  - b. 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.
  - c. 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.
  - d. 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.
  - e. 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.
4. [40 CFR 63.1512(j)]  
The permittee must conduct performance tests as described below. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl from each emissions unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in 40 CFR 63.1510(t). A performance test is required for each in-line fluxer to measure emissions of PM and HCl.
  5. [40 CFR 63.1511(c)]  
The permittee must use the following methods in 40 CFR Part 60, Appendix A to determine compliance with the applicable emission limits or standards:
    - a. Method 1 for sample and velocity traverses.
    - b. Method 2 for velocity and volumetric flow rate.
    - c. Method 3 for gas analysis.
    - d. Method 4 for moisture content of the stack gas.
    - e. Method 5 for the concentration of PM.
    - f. Method 9 for visible emission observations.
    - g. Method 23 for the concentration of D/F.
    - h. Method 25A for the concentration of THC, as propane.
    - i. Method 26A for the concentration of HCl.

Where a lime-injected fabric filter is used as the control device to comply with the 90 percent reduction standard, the permittee must measure the fabric filter inlet concentration of HCl at a point before lime is introduced to the system.
  6. [40 CFR 63.1512(k)]  
During the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the permittee of an affected source or emissions 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 emissions unit for each of the three test runs and calculate and record the total weight. A permittee that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emissions unit or affected source instead of the feed/charge weight.
  7. [40 CFR 63.1511(d)]  
The permittee may use an alternative test method, subject to approval by the Administrator.
  8. [40 CFR 63.1511(e)]  
The permittee of new or existing affected sources and emissions units located at secondary aluminum production facilities that are major sources must conduct a performance test every 5 years following the initial performance test.
  9. [40 CFR 63.1511(f)]  
With the approval of the Ohio EPA, Southeast District Office, a single representative or similar group 1 furnace or in-line fluxer which is not controlled by an add-on control device may be tested to determine the emission rate of all like affected sources at a facility provided that:
    - a. the tested emissions unit must use identical feed/charge and flux materials in the same proportions as the emissions units that it represents;
    - b. the tested emissions unit is subject to the same work practices as the emissions units that it represents;
    - c. the tested emissions unit is of the same design as the emissions units that it represents;
    - d. the tested emissions unit is tested under the highest load or capacity reasonably expected to occur for any of the emissions units that it represents;
    - e. at least one of each different style of emissions unit at the facility is tested; and
    - f. all add-on control devices are tested.
  10. [40 CFR 63.1513(b)]  
The following equation shall be used to determine compliance with an emission limit for PM, HCl, and D/F:

$$E = (C \times Q \times K1) / P$$

where:

E = emission rate of PM, HCl, or D/F, kg/Mg (lb/ton) of feed;  
 C = concentration of PM, HCl, or D/F, g/dscm (gr/dscf);  
 Q = volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);  
 K1 = conversion factor, 1 kg/1,000 g (1 lb/7,000 gr); and  
 P = production rate, Mg/hr (ton/hr).

11. [40 CFR 63.1513(e)]  
 The equation contained in 40 CFR 63.1513(e)(1) shall be used to determine compliance with the mass-weighted particulate emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 1 in 40 CFR 63.1505 (k).

The equation contained in 40 CFR 63.1513(e)(2) shall be used to determine compliance with the aluminum mass-weighted HCl emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 2 in 40 CFR 63.1505 (k).

The equation contained in 40 CFR 63.1513(e)(3) shall be used to determine compliance with the aluminum mass-weighted D/F emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 3 in 40 CFR 63.1505 (k).

As an alternative to using the equations in this section, the permittee may demonstrate compliance for a secondary aluminum processing unit by demonstrating that each existing group 1 furnace is in compliance with the emission limits for a new group 1 furnace in 40 CFR 63.1505(j) and that each existing in-line fluxer is in compliance with the emission limits for a new in-line fluxer in 40 CFR 63.1505(j).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: P037 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: P038 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B&K light gage leveling line	OAC rule 3745-31-05 (PTI 17-974)	3.62 pounds per hour of volatile organic compounds (VOC)

See A.I.2.a below.

2. **Additional Terms and Conditions**

- a. The permittee shall employ only Isopar L lubricant in this emissions unit.

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records of the following information for each day the emissions unit is in operation:

- a. the type of lubricant employed;
- b. the total quantity of lubricant employed;
- c. the quantity of used lubricant recovered from the sump;
- d. the total hours the leveling line was in operation; and
- e. the average hourly VOC emission rate  $[(b) - (c) / (d)]$ .

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**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the average hourly VOC emissions exceeded 3.62 pounds per hour, and the actual average hourly VOC emissions for each such day.

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**V. Testing Requirements**

1. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
  - a. Emission Limitation:
 

3.62 pounds per hour of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

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**VI. Miscellaneous Requirements**

1. None

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**Facility ID: 0656000014 Emissions Unit ID: P038 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>		
1. None		

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**Facility ID: 0656000014 Emissions Unit ID: P039 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Stamco MFG aluminum coil leveling line - wide tension leveling line	none	none
		See A.I.2.a below.

**2. Additional Terms and Conditions**

- a. This emissions unit is an existing stationary source (installed in 1966) located at a facility which is not in a "Priority 1" county as specified in OAC rule 3745-21-06(A). Therefore, the requirements specified in OAC rule 3745-21-07 do not apply to this emissions unit.

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**B. State Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0656000014 Emissions Unit ID: P040 Issuance type: Title V Draft Permit

A. **State and Federally Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
SNIF degassing pit #1 - in-line fluxer with no controls	OAC rule 3745-31-05 (PTI 17-988)	This emissions unit is limited to 0.60 lb/hr and 0.60 tpy of particulate emissions and 1.2 lbs/hr and 1.3 tpy of hydrogen chloride (HCl). (These emission limitations are less stringent than those contained in 40 CFR Part 63, Subpart RRR, and shall cease to be in effect upon the effective compliance date of Subpart RRR - Secondary Aluminum MACT.)
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 63, Subpart RRR	Upon the effective date of 40 CFR Part 63, Subpart RRR, this emissions unit is limited to the following per 40 CFR 63.1505(j):
		0.01 pound of particulate emissions per ton of feed/charge
		0.04 pound of HCl per ton of feed/charge
		The permittee may determine the emission standards for a secondary aluminum processing unit (SAPU) by applying the in-line fluxer limits on the basis of the aluminum production weight in each in-line fluxer, rather than on the basis of feed/charge.

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

- 1. [40 CFR 63.1506(b)]  
By March 24, 2003, the permittee must provide and maintain easily visible labels posted at each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln that identifies the

applicable emission limits and means of compliance, including:

- a. The type of affected source or emissions unit (e.g., scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, in-line fluxer).
  - b. The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the operation, maintenance, and monitoring (OM&M) plan.
2. [40 CFR 63.1506(d)]  
The permittee of each affected source or emissions unit subject to an emission limit in kg/Mg (lb/ton) of feed/charge must:
    - a. Install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test.
    - b. Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
    - c. The permittee may chose to measure and record aluminum production weight from an affected source or emissions unit rather than feed/charge weight to an affected source or emissions unit, provided that:
      - i. the aluminum production weight, rather than feed/charge weight is measured and recorded for all emissions units within a SAPU; and
      - ii. all calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.
  3. [40 CFR 63.1511(g)]  
By March 24, 2003, the permittee of the new or existing affected sources and emissions 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 permittee 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 permittee 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 Ohio EPA, Southeast District Office:
    - a. the complete emission test report(s) used as the basis of the parameter(s) is submitted;
    - b. the same test methods and procedures as required by this subpart were used in the test;
    - c. the permittee 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; and
    - d. all process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report.

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### III. Monitoring and/or Record Keeping Requirements

1. [40 CFR 63.1510(b)]  
The permittee must prepare and implement for each new or existing affected source and emission unit, a written OM&M plan. By March 24, 2003, the permittee must submit the plan to the Ohio EPA, Southeast District Office for review and approval as part of the application for a Part 70 or Part 71 permit. Any subsequent changes to the plan must be submitted to the Ohio EPA, Southeast District Office for review and approval. Pending approval by the Ohio EPA, Southeast District Office of an initial or amended plan, the permittee must comply with the provisions of the submitted plan. Each plan must contain the following information:
  - a. Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
  - b. A monitoring schedule for each affected source and emissions unit.
  - c. Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR 63.1505.
  - d. Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
    - i. calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and
    - ii. procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in Subpart A of 40 CFR Part 63.
  - e. Procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
  - f. Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in this section, including:
    - i. procedures to determine and record the cause of an deviation or excursion, and the time the deviation or

- excursion began and ended; and
- ii. procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
- g. A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
2. [40 CFR 63.1510(s)]  
The permittee of a secondary aluminum processing unit at a facility must include, within the OM&M plan prepared in accordance with 40 CFR 63.1510(b), the following information:
- a. the identification of each emissions unit in the secondary aluminum processing unit;
  - b. the specific control technology or pollution prevention measure to be used for each emissions unit in the secondary aluminum processing unit and the date of its installation or application;
  - c. the emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;
  - d. information and data demonstrating compliance for each emissions unit with all applicable design, equipment, work practice or operational standards of this subpart; and
  - e. the monitoring requirements applicable to each emissions unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average (3-day, 24-hour rolling average means daily calculations of the average 24-hour emission rate over the most recent consecutive 24-hour periods) using the procedure in 40 CFR 63.1510(t).
3. The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:
- a. any averaging among emissions of differing pollutants;
  - b. the inclusion of any affected sources other than emissions units in a secondary aluminum processing unit;
  - c. the inclusion of any emissions unit while it is shut down; or
  - d. the inclusion of any periods of startup, shutdown, or malfunction in emission calculations.
- To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the permittee must submit a request to the Ohio EPA, Southeast District Office containing the information required in section A.III.2 and obtain approval of the Ohio EPA, Southeast District Office prior to implementing any revisions.
4. [40 CFR 63.1510(c)]  
The permittee must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.
5. [40 CFR 63.1510(j)]  
By March 24, 2003, the permittee must:
- a. Install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emissions unit.
    - i. The monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.
    - ii. The accuracy of the weight measurement device must be plus/minus 1 percent of the weight of the reactive component of the flux being measured. The permittee may apply to the Ohio EPA, Southeast District Office for permission to use a weight measurement device of alternative accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of plus/minus 1 percent impracticable. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards.
    - iii. The permittee must 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.
  - b. Calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - c. Record for each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of:
    - i. gaseous or liquid reactive flux other than chlorine; and
    - ii. solid reactive flux.
  - d. Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - e. The permittee of a group 1 furnace or in-line fluxer performing reactive fluxing may apply to the Administrator for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis.
6. [40 CFR 63.1510(e)]  
By March 24, 2003, the permittee of an affected source or emissions unit subject to an emission limit in

kg/Mg (lb/ton) or g/Mg (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emissions unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emissions unit-by-emissions unit basis. As an alternative to a measurement device, the permittee may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emissions unit.

a. The accuracy of the weight measurement device or procedure must be +1 percent of the weight being measured. The permittee may apply to the Ohio EPA, Southeast District Office for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standard.

b. The permittee must 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.

7. [40 CFR 63.1512(o)]

The permittee must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.

a. Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15 minute period during the HCl and D/F 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.

b. Record the identity, composition, and total weight of each addition of solid reactive flux for the 3 test runs.

c. 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 the following equation:

$$Wt = F1W1 + F2W2$$

where:

Wt = total chlorine usage, by weight;

F1 = fraction of gaseous or liquid flux that is chlorine;

W1 = weight of reactive flux gas or liquid injected;

F2 = fraction of solid reactive chloride flux that is chlorine (e.g., F = 0.75 for magnesium chloride; and

W2 = weight of solid reactive flux.

d. Divide the weight of total chlorine usage (Wt) for the 3 test runs by the recorded measurement of the total weight of feed for the 3 test runs.

e. If a solid reactive flux other than magnesium chloride is used, the permittee must derive the appropriate proportion factor subject to approval by the Ohio EPA, Southeast District Office.

8. [40 CFR 63.1516(a)]

By March 24, 2003, the permittee must develop and implement a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:

a. procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and

b. corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.

9. [40 CFR 63.1517(a)]

As required by 40 CFR 63.10(b), the permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart.

a. The permittee must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.

b. The permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche.

c. The permittee may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.

10. [40 CFR 63.1517(b)]

In addition to the general records required by 40 CFR 63.10(b), the permittee of a new or existing affected source (including an emissions unit in a secondary aluminum processing unit) must maintain records of:

a. for each group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer, records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken;

- b. for each affected source and emissions unit subject to an emission standard in kg/Mg (lb/ton) of feed/charge, records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test;
  - c. records of monthly inspections for proper unit labeling for each affected source and emissions unit subject to labeling requirements;
  - d. records of annual inspections of emission capture/collection and closed vent systems;
  - e. records of any approved alternative monitoring or test procedure;
  - f. current copies of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:
    - i. startup, shutdown, and malfunction plan;
    - ii. for major sources, OM&M plan; and
    - iii. site-specific secondary aluminum processing unit emission plan (if applicable); and
  - g. for each secondary aluminum processing unit, records of total charge weight, or if the permittee chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.
11. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
12. [40 CFR 63.1510(w)]  
The permittee may submit an application to the Administrator for approval of alternate monitoring requirements to demonstrate compliance with the emission standards of this subpart, subject to the provisions of paragraphs (a) through (f) of this section.
- a. The Administrator will not approve averaging periods other than those specified in this section.
  - b. The permittee must continue to use the original monitoring requirement until necessary data are submitted and approval is received to use another monitoring procedure.
  - c. The permittee shall submit the application for approval of alternate monitoring methods no later than the notification of the performance test. The application must contain the information specified in sections A.III.12.c.i through A.III.12.c.iii:
    - i. data or information justifying the request, such as the technical or economic infeasibility, or the impracticality of using the required approach;
    - ii. a description of the proposed alternative monitoring requirements, including the operating parameters to be monitored, the monitoring approach and technique, and how the limit is to be calculated; and
    - iii. data and information documenting that the alternative monitoring requirement(s) would provide equivalent or better assurance of compliance with the relevant emission standard(s).
  - d. The Administrator will not approve an alternate monitoring application unless it would provide equivalent or better assurance of compliance with the relevant emission standard(s). Before disapproving any alternate monitoring application, the Administrator will provide:
    - i. notice of the information and findings upon which the intended disapproval is based; and
    - ii. notice of opportunity for the permittee to present additional supporting information before final action is taken on the application (This notice will specify how much additional time is allowed for the permittee to provide additional supporting information.).
  - e. The permittee is responsible for submitting any supporting information in a timely manner to enable the Administrator to consider the application prior to the performance test. Neither submittal of an application nor the Administrator's failure to approve or disapprove the application relieves the permittee of the responsibility to comply with any provisions of this subpart.
  - f. The Administrator may decide at any time, on a case-by-case basis, that additional or alternative operating limits, or alternative approaches to establishing operating limits, are necessary to demonstrate compliance with the emission standards of this subpart.
13. [40 CFR 63.1510(t)]  
Except as provided in section A.III.14, the permittee must calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for each secondary aluminum processing unit on a daily basis. To calculate the 3-day, 24-hour rolling average, the permittee must:
- a. Calculate and record the total weight of material charged to each emissions unit in the secondary aluminum processing unit for each 24-hour day of operation using the feed/charge weight information required in 40 CFR 63.1510(e). If the permittee chooses to comply on the basis of weight of aluminum produced by the emissions unit, rather than weight of material charged to the emissions unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.
  - b. Multiply the total feed/charge weight to the emissions unit, or the weight of aluminum produced by the emissions unit, for each emissions unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emissions unit (as determined during the performance test) to provide emissions for each emissions

unit for the 24-hour period, in pounds.

- c. Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.
- d. Compute the 24-hour daily emission rate using the equation in 40 CFR 63.1510(t)(4).
- e. Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.

14. [40 CFR 63.1510(u)]  
As an alternative to the procedures of section A.III.13, the permittee may demonstrate, through performance tests, that each individual emissions unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emissions unit.

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#### IV. Reporting Requirements

1. [40 CFR 63.1515(b)]  
Each permittee must submit a notification of compliance status report within 60 days after the compliance dates specified in 40 CFR 63.1501. The notification must be signed by the responsible official who must certify its accuracy. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. The permittee must provide duplicate notification to the applicable Regional Administrator. If a permittee submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report must include:
  - a. All information required in 40 CFR 63.9(h). The permittee must provide a complete performance test report for each affected source and emissions unit for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).
  - b. Unit labeling as described in 40 CFR 63.1506(b), including process type or furnace classification and operating requirements.
  - c. The compliant operating parameter value or range established for each affected source or emissions unit with supporting documentation and a description of the procedure used to establish the value (e.g., total reactive chlorine flux injection rate), including the operating cycle or time period used in the performance test.
  - d. Approved OM&M plan (including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device).
  - e. Startup, shutdown, and malfunction plan, with revisions.
2. [40 CFR 63.1516(b)(1)]  
As required by 40 CFR 63.10(e)(3), the permittee must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). When no deviations of parameters have occurred, the permittee must submit a report stating that no excess emissions occurred during the reporting period.
  - a. A report must be submitted if any of these conditions occur during a 6-month reporting period:
    - i. an excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter);
    - ii. an action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3);
    - iii. an affected source (including an emissions unit in a secondary aluminum processing unit) was not operated according to the requirements of this subpart; and/or
    - iv. a deviation from the 3-day, 24-hour rolling average emission limit for a secondary aluminum processing unit.
3. [40 CFR 63.1516(c)]  
For the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the permittee must certify continuing compliance based upon, but not limited to, the following conditions:
  - a. any period of excess emissions, as defined in this section, that occurred during the year were reported as required by this section; and
  - b. all monitoring, record keeping, and reporting requirements were met during the year.
4. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
5. [40 CFR 63.1512(r)]  
The permittee of each scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, and in-line fluxer must submit the information described in 40 CFR 63.1515(b)(3) as part of the notification of compliance status report to document conformance with the operational standard in 40 CFR 63.1506(b).

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible emission limit shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
  - b. Emission Limitations:

0.60 lb/hr and 0.60 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.2 through A.V.11.
  - c. Emission Limitations:

1.2 lbs/hr and 1.3 tpy of HCl

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.2 through A.V.11.
  - d. Emission Limitation:

0.01 pound of particulate emissions per ton of feed/charge

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.2 through A.V.11.
  - e. Emission Limitation:

0.04 pound of HCl per ton of feed/charge

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.2 through A.V.11.
2. [40 CFR 63.1511(a)] and [40 CFR 63.1512(h)]

The permittee must conduct a performance test to measure emissions of HCl and PM. The permittee may choose to determine the rate of reactive flux addition to the in-line fluxer and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all reactive flux added to the in-line fluxer is emitted. Under these circumstances, the permittee is not required to conduct an emission test for HCl. Prior to conducting a performance test required by this permit, the permittee must prepare and submit a site-specific test plan meeting the requirements in 40 CFR 63.7(c).

[40 CFR 63.1515(a)(6)]  
As required by 40 CFR 63.9(e) and (f), the permittee must provide notification of the anticipated date for conducting performance tests and visible emission observations. The permittee must notify the Ohio EPA, Southeast District Office of the intent to conduct a performance test at least 60 days before the performance test is scheduled; notification of opacity or visible emission observations for a performance test must be provided at least 30 days before the observations are scheduled to take place.
3. [40 CFR 63.1511(b)]

Following approval of the site-specific test plan, the permittee must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected source and emissions unit, and report the results in the notification of compliance status report as described in 40 CFR 63.1515(b). The permittee must conduct each performance test according to the requirements of the general provisions in Subpart A of 40 CFR Part 63 and this subpart.

  - a. The permittee must conduct each test while the affected source or emissions unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.

- b. 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.
- c. 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.
- d. 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.
- e. 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.
4. [40 CFR 63.1512(j)]  
The permittee must conduct performance tests as described below. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl from each emissions unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in 40 CFR 63.1510(t). A performance test is required for each in-line fluxer to measure emissions of PM and HCl.
5. [40 CFR 63.1511(c)]  
The permittee must use the following methods in 40 CFR Part 60, Appendix A to determine compliance with the applicable emission limits or standards:
- Method 1 for sample and velocity traverses.
  - Method 2 for velocity and volumetric flow rate.
  - Method 3 for gas analysis.
  - Method 4 for moisture content of the stack gas.
  - Method 5 for the concentration of PM.
  - Method 9 for visible emission observations.
  - Method 23 for the concentration of D/F.
  - Method 25A for the concentration of THC, as propane.
  - Method 26A for the concentration of HCl.
- Where a lime-injected fabric filter is used as the control device to comply with the 90 percent reduction standard, the permittee must measure the fabric filter inlet concentration of HCl at a point before lime is introduced to the system.
6. [40 CFR 63.1512(k)]  
During the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the permittee of an affected source or emissions 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 emissions unit for each of the three test runs and calculate and record the total weight. A permittee that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emissions unit or affected source instead of the feed/charge weight.
7. [40 CFR 63.1511(d)]  
The permittee may use an alternative test method, subject to approval by the Administrator.
8. [40 CFR 63.1511(e)]  
The permittee of new or existing affected sources and emissions units located at secondary aluminum production facilities that are major sources must conduct a performance test every 5 years following the initial performance test.
9. [40 CFR 63.1511(f)]  
With the approval of the Ohio EPA, Southeast District Office, a single representative or similar group 1 furnace or in-line fluxer which is not controlled by an add-on control device may be tested to determine the emission rate of all like affected sources at a facility provided that:
- the tested emissions unit must use identical feed/charge and flux materials in the same proportions as the emissions units that it represents;
  - the tested emissions unit is subject to the same work practices as the emissions units that it represents;
  - the tested emissions unit is of the same design as the emissions units that it represents;
  - the tested emissions unit is tested under the highest load or capacity reasonably expected to occur for any of the emissions units that it represents;
  - at least one of each different style of emissions unit at the facility is tested; and
  - all add-on control devices are tested.
10. [40 CFR 63.1513(b)]  
The following equation shall be used to determine compliance with an emission limit for PM, HCl, and D/F:
- $$E = (C \times Q \times K1) / P$$
- where:
- E = emission rate of PM, HCl, or D/F, kg/Mg (lb/ton) of feed;  
C = concentration of PM, HCl, or D/F, g/dscm (gr/dscf);

Q = volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);  
 K1 = conversion factor, 1 kg/1,000 g (1 lb/7,000 gr); and  
 P = production rate, Mg/hr (ton/hr).

11. [40 CFR 63.1513(e)]  
 The equation contained in 40 CFR 63.1513(e)(1) shall be used to determine compliance with the mass-weighted particulate emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 1 in 40 CFR 63.1505 (k).

The equation contained in 40 CFR 63.1513(e)(2) shall be used to determine compliance with the aluminum mass-weighted HCl emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 2 in 40 CFR 63.1505 (k).

The equation contained in 40 CFR 63.1513(e)(3) shall be used to determine compliance with the aluminum mass-weighted D/F emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 3 in 40 CFR 63.1505 (k).

As an alternative to using the equations in this section, the permittee may demonstrate compliance for a secondary aluminum processing unit by demonstrating that each existing group 1 furnace is in compliance with the emission limits for a new group 1 furnace in 40 CFR 63.1505(i) and that each existing in-line fluxer is in compliance with the emission limits for a new in-line fluxer in 40 CFR 63.1505(j).

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**VI. Miscellaneous Requirements**

1. None

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**B. State Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0656000014 Emissions Unit ID: P041 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
SNIF degassing pit #2 - in-line fluxer with no controls	OAC rule 3745-31-05 (PTI 17-988)	This emissions unit is limited to 0.90 lb/hr and 0.60 tpy of particulate emissions and 1.2 lbs/hr and 1.3 tpy of hydrogen chloride (HCl). (These emission limitations are less stringent than those contained in 40 CFR Part 63, Subpart RRR, and shall cease to be in effect upon the effective compliance date of Subpart RRR - Secondary Aluminum MACT.)
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 63, Subpart RRR	Upon the effective date of 40 CFR Part 63, Subpart RRR, this emissions unit is limited to the following per 40 CFR 63.1505(j):  0.01 pound of particulate emissions per ton of feed/charge  0.04 pound of HCl per ton of feed/charge  The permittee may determine the emission standards for a secondary aluminum processing unit (SAPU) by applying the in-line fluxer limits on the basis of the aluminum production weight in each in-line fluxer, rather than on the basis of feed/charge.

- 2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

1. [40 CFR 63.1506(b)]  
By March 24, 2003, the permittee must provide and maintain easily visible labels posted at each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln that identifies the applicable emission limits and means of compliance, including:
  - a. The type of affected source or emissions unit (e.g., scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, in-line fluxer).
  - b. The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the operation, maintenance, and monitoring (OM&M) plan.
2. [40 CFR 63.1506(d)]  
The permittee of each affected source or emissions unit subject to an emission limit in kg/Mg (lb/ton) of feed/charge must:
  - a. Install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test.
  - b. Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
  - c. The permittee may chose to measure and record aluminum production weight from an affected source or emissions unit rather than feed/charge weight to an affected source or emissions unit, provided that:
    - i. the aluminum production weight, rather than feed/charge weight is measured and recorded for all emissions units within a SAPU; and
    - ii. all calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.
3. [40 CFR 63.1511(g)]  
By March 24, 2003, the permittee of the new or existing affected sources and emissions 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 permittee 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 permittee 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 Ohio EPA, Southeast District Office:
  - a. the complete emission test report(s) used as the basis of the parameter(s) is submitted;
  - b. the same test methods and procedures as required by this subpart were used in the test;
  - c. the permittee 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; and
  - d. all process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report.

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III. **Monitoring and/or Record Keeping Requirements**

1. [40 CFR 63.1510(b)]  
The permittee must prepare and implement for each new or existing affected source and emission unit, a written OM&M plan. By March 24, 2003, the permittee must submit the plan to the Ohio EPA, Southeast District Office for review and approval as part of the application for a Part 70 or Part 71 permit. Any subsequent changes to the plan must be submitted to the Ohio EPA, Southeast District Office for review and approval. Pending approval by the Ohio EPA, Southeast District Office of an initial or amended plan, the permittee must comply with the provisions of the submitted plan. Each plan must contain the following information:
  - a. Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
  - b. A monitoring schedule for each affected source and emissions unit.
  - c. Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR 63.1505.
  - d. Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
    - i. calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and

- ii. procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in Subpart A of 40 CFR Part 63.
  - e. Procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
  - f. Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in this section, including:
    - i. procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and
    - ii. procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
  - g. A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
- 2. [40 CFR 63.1510(s)]  
The permittee of a secondary aluminum processing unit at a facility must include, within the OM&M plan prepared in accordance with 40 CFR 63.1510(b), the following information:
  - a. the identification of each emissions unit in the secondary aluminum processing unit;
  - b. the specific control technology or pollution prevention measure to be used for each emissions unit in the secondary aluminum processing unit and the date of its installation or application;
  - c. the emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;
  - d. information and data demonstrating compliance for each emissions unit with all applicable design, equipment, work practice or operational standards of this subpart; and
  - e. the monitoring requirements applicable to each emissions unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average (3-day, 24-hour rolling average means daily calculations of the average 24-hour emission rate over the 3 most recent consecutive 24-hour periods) using the procedure in 40 CFR 63.1510(t).
- 3. The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:
  - a. any averaging among emissions of differing pollutants;
  - b. the inclusion of any affected sources other than emissions units in a secondary aluminum processing unit;
  - c. the inclusion of any emissions unit while it is shut down; or
  - d. the inclusion of any periods of startup, shutdown, or malfunction in emission calculations.

To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the permittee must submit a request to the Ohio EPA, Southeast District Office containing the information required in section A.III.2 and obtain approval of the Ohio EPA, Southeast District Office prior to implementing any revisions.
- 4. [40 CFR 63.1510(c)]  
The permittee must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.
- 5. [40 CFR 63.1510(j)]  
By March 24, 2003, the permittee must:
  - a. Install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emissions unit.
    - i. The monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.
    - ii. The accuracy of the weight measurement device must be plus/minus 1 percent of the weight of the reactive component of the flux being measured. The permittee may apply to the Ohio EPA, Southeast District Office for permission to use a weight measurement device of alternative accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of plus/minus 1 percent impracticable. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards.
    - iii. The permittee must 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.
  - b. Calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - c. Record for each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of:
    - i. gaseous or liquid reactive flux other than chlorine; and
    - ii. solid reactive flux.
  - d. Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).

- e. The permittee of a group 1 furnace or in-line fluxer performing reactive fluxing may apply to the Administrator for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis.
6. [40 CFR 63.1510(e)]  
By March 24, 2003, the permittee of an affected source or emissions unit subject to an emission limit in kg/Mg (lb/ton) or g/Mg (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emissions unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emissions unit-by-emissions unit basis. As an alternative to a measurement device, the permittee may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emissions unit.
- a. The accuracy of the weight measurement device or procedure must be +1 percent of the weight being measured. The permittee may apply to the Ohio EPA, Southeast District Office for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the permittee provides assurance through data and information that the affected source will meet the relevant emission standard.
- b. The permittee must 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.
7. [40 CFR 63.1512(o)]  
The permittee must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.
- a. Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15 minute period during the HCl and D/F 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.
- b. Record the identity, composition, and total weight of each addition of solid reactive flux for the 3 test runs.
- c. 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 the following equation:
- $$Wt = F1W1 + F2W2$$
- where:
- Wt = total chlorine usage, by weight;  
F1 = fraction of gaseous or liquid flux that is chlorine;  
W1 = weight of reactive flux gas or liquid injected;  
F2 = fraction of solid reactive chloride flux that is chlorine (e.g., F = 0.75 for magnesium chloride; and  
W2 = weight of solid reactive flux.
- d. Divide the weight of total chlorine usage (Wt) for the 3 test runs by the recorded measurement of the total weight of feed for the 3 test runs.
- e. If a solid reactive flux other than magnesium chloride is used, the permittee must derive the appropriate proportion factor subject to approval by the Ohio EPA, Southeast District Office.
8. [40 CFR 63.1516(a)]  
By March 24, 2003, the permittee must develop and implement a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:
- a. procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
- b. corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
9. [40 CFR 63.1517(a)]  
As required by 40 CFR 63.10(b), the permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart.
- a. The permittee must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.
- b. The permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche.
- c. The permittee may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.

10. [40 CFR 63.1517(b)]  
In addition to the general records required by 40 CFR 63.10(b), the permittee of a new or existing affected source (including an emissions unit in a secondary aluminum processing unit) must maintain records of:
- for each group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer, records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken;
  - for each affected source and emissions unit subject to an emission standard in kg/Mg (lb/ton) of feed/charge, records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test;
  - records of monthly inspections for proper unit labeling for each affected source and emissions unit subject to labeling requirements;
  - records of annual inspections of emission capture/collection and closed vent systems;
  - records of any approved alternative monitoring or test procedure;
  - current copies of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:
    - startup, shutdown, and malfunction plan;
    - for major sources, OM&M plan; and
    - site-specific secondary aluminum processing unit emission plan (if applicable); and
  - for each secondary aluminum processing unit, records of total charge weight, or if the permittee chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.
11. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- the color of the emissions;
  - whether the emissions are representative of normal operations;
  - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - the total duration of any visible emission incident; and
  - any corrective actions taken to eliminate the visible emissions.
12. [40 CFR 63.1510(w)]  
The permittee may submit an application to the Administrator for approval of alternate monitoring requirements to demonstrate compliance with the emission standards of this subpart, subject to the provisions of paragraphs (a) through (f) of this section.
- The Administrator will not approve averaging periods other than those specified in this section.
  - The permittee must continue to use the original monitoring requirement until necessary data are submitted and approval is received to use another monitoring procedure.
  - The permittee shall submit the application for approval of alternate monitoring methods no later than the notification of the performance test. The application must contain the information specified in sections A.III.12.c.i through A.III.12.c.iii:
    - data or information justifying the request, such as the technical or economic infeasibility, or the impracticality of using the required approach;
    - a description of the proposed alternative monitoring requirements, including the operating parameters to be monitored, the monitoring approach and technique, and how the limit is to be calculated; and
    - data and information documenting that the alternative monitoring requirement(s) would provide equivalent or better assurance of compliance with the relevant emission standard(s).
  - The Administrator will not approve an alternate monitoring application unless it would provide equivalent or better assurance of compliance with the relevant emission standard(s). Before disapproving any alternate monitoring application, the Administrator will provide:
    - notice of the information and findings upon which the intended disapproval is based; and
    - notice of opportunity for the permittee to present additional supporting information before final action is taken on the application (This notice will specify how much additional time is allowed for the permittee to provide additional supporting information.).
  - The permittee is responsible for submitting any supporting information in a timely manner to enable the Administrator to consider the application prior to the performance test. Neither submittal of an application nor the Administrator's failure to approve or disapprove the application relieves the permittee of the responsibility to comply with any provisions of this subpart.
  - The Administrator may decide at any time, on a case-by-case basis, that additional or alternative operating limits, or alternative approaches to establishing operating limits, are necessary to demonstrate compliance with the emission standards of this subpart.
13. [40 CFR 63.1510(t)]  
Except as provided in section A.III.14, the permittee must calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for each secondary aluminum processing unit on a daily basis. To calculate the 3-day, 24-hour rolling average, the permittee must:

- a. Calculate and record the total weight of material charged to each emissions unit in the secondary aluminum processing unit for each 24-hour day of operation using the feed/charge weight information required in 40 CFR 63.1510(e). If the permittee chooses to comply on the basis of weight of aluminum produced by the emissions unit, rather than weight of material charged to the emissions unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.
  - b. Multiply the total feed/charge weight to the emissions unit, or the weight of aluminum produced by the emissions unit, for each emissions unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emissions unit (as determined during the performance test) to provide emissions for each emissions unit for the 24-hour period, in pounds.
  - c. Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.
  - d. Compute the 24-hour daily emission rate using the equation in 40 CFR 63.1510(t)(4).
  - e. Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.
14. [40 CFR 63.1510(u)]  
As an alternative to the procedures of section A.III.13, the permittee may demonstrate, through performance tests, that each individual emissions unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emissions unit.

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#### IV. Reporting Requirements

1. [40 CFR 63.1515(b)]  
Each permittee must submit a notification of compliance status report within 60 days after the compliance dates specified in 40 CFR 63.1501. The notification must be signed by the responsible official who must certify its accuracy. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. The permittee must provide duplicate notification to the applicable Regional Administrator. If a permittee submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report must include:
  - a. All information required in 40 CFR 63.9(h). The permittee must provide a complete performance test report for each affected source and emissions unit for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).
  - b. Unit labeling as described in 40 CFR 63.1506(b), including process type or furnace classification and operating requirements.
  - c. The compliant operating parameter value or range established for each affected source or emissions unit with supporting documentation and a description of the procedure used to establish the value (e.g., total reactive chlorine flux injection rate), including the operating cycle or time period used in the performance test.
  - d. Approved OM&M plan (including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device).
  - e. Startup, shutdown, and malfunction plan, with revisions.
2. [40 CFR 63.1516(b)(1)]  
As required by 40 CFR 63.10(e)(3), the permittee must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). When no deviations of parameters have occurred, the permittee must submit a report stating that no excess emissions occurred during the reporting period.
  - a. A report must be submitted if any of these conditions occur during a 6-month reporting period:
    - i. an excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter);
    - ii. an action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3);
    - iii. an affected source (including an emissions unit in a secondary aluminum processing unit) was not operated according to the requirements of this subpart; and/or
    - iv. a deviation from the 3-day, 24-hour rolling average emission limit for a secondary aluminum processing unit.
3. [40 CFR 63.1516(c)]  
For the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the permittee must certify continuing compliance based upon, but not limited to, the following conditions:
  - a. any period of excess emissions, as defined in this section, that occurred during the year were reported as required by this section; and
  - b. all monitoring, record keeping, and reporting requirements were met during the year.
4. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any

corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

5. [40 CFR 63.1512(r)]  
The permittee of each scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, and in-line fluxer must submit the information described in 40 CFR 63.1515(b)(3) as part of the notification of compliance status report to document conformance with the operational standard in 40 CFR 63.1506(b).

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible emission limit shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
  - b. Emission Limitations:
 

0.90 lb/hr and 0.60 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.2 through A.V.11.
  - c. Emission Limitations:
 

1.2 lbs/hr and 1.3 tpy of HCl

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.2 through A.V.11.
  - d. Emission Limitation:
 

0.01 pound of particulate emissions per ton of feed/charge

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.2 through A.V.11.
  - e. Emission Limitation:
 

0.04 pound of HCl per ton of feed/charge

Applicable Compliance Method:

Compliance shall be demonstrated based upon the testing requirements specified in sections A.V.2 through A.V.11.
2. [40 CFR 63.1511(a)] and [40 CFR 63.1512(h)]  
The permittee must conduct a performance test to measure emissions of HCl and PM. The permittee may choose to determine the rate of reactive flux addition to the in-line fluxer and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all reactive flux added to the in-line fluxer is emitted. Under these circumstances, the permittee is not required to conduct an emission test for HCl. Prior to conducting a performance test required by this permit, the permittee must prepare and submit a site-specific test plan meeting the requirements in 40 CFR 63.7(c).  
  
[40 CFR 63.1515(a)(6)]  
As required by 40 CFR 63.9(e) and (f), the permittee must provide notification of the anticipated date for conducting performance tests and visible emission observations. The permittee must notify the Ohio EPA, Southeast District Office of the intent to conduct a performance test at least 60 days before the performance test is scheduled; notification of opacity or visible emission observations for a performance test must be provided at least 30 days before the observations are scheduled to take place.
3. [40 CFR 63.1511(b)]

Following approval of the site-specific test plan, the permittee must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected source and emissions unit, and report the results in the notification of compliance status report as described in 40 CFR 63.1515(b). The permittee must conduct each performance test according to the requirements of the general provisions in Subpart A of 40 CFR Part 63 and this subpart.

- a. The permittee must conduct each test while the affected source or emissions unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.
- b. 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.
- c. 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.
- d. 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.
- e. 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.

4. [40 CFR 63.1512(j)]  
The permittee must conduct performance tests as described below. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl from each emissions unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in 40 CFR 63.1510(t). A performance test is required for each in-line fluxer to measure emissions of PM and HCl.

5. [40 CFR 63.1511(c)]  
The permittee must use the following methods in 40 CFR Part 60, Appendix A to determine compliance with the applicable emission limits or standards:

- a. Method 1 for sample and velocity traverses.
- b. Method 2 for velocity and volumetric flow rate.
- c. Method 3 for gas analysis.
- d. Method 4 for moisture content of the stack gas.
- e. Method 5 for the concentration of PM.
- f. Method 9 for visible emission observations.
- g. Method 23 for the concentration of D/F.
- h. Method 25A for the concentration of THC, as propane.
- i. Method 26A for the concentration of HCl.

Where a lime-injected fabric filter is used as the control device to comply with the 90 percent reduction standard, the permittee must measure the fabric filter inlet concentration of HCl at a point before lime is introduced to the system.

6. [40 CFR 63.1512(k)]  
During the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the permittee of an affected source or emissions 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 emissions unit for each of the three test runs and calculate and record the total weight. A permittee that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emissions unit or affected source instead of the feed/charge weight.

7. [40 CFR 63.1511(d)]  
The permittee may use an alternative test method, subject to approval by the Administrator.

8. [40 CFR 63.1511(e)]  
The permittee of new or existing affected sources and emissions units located at secondary aluminum production facilities that are major sources must conduct a performance test every 5 years following the initial performance test.

9. [40 CFR 63.1511(f)]  
With the approval of the Ohio EPA, Southeast District Office, a single representative or similar group 1 furnace or in-line fluxer which is not controlled by an add-on control device may be tested to determine the emission rate of all like affected sources at a facility provided that:

- a. the tested emissions unit must use identical feed/charge and flux materials in the same proportions as the emissions units that it represents;
- b. the tested emissions unit is subject to the same work practices as the emissions units that it represents;
- c. the tested emissions unit is of the same design as the emissions units that it represents;
- d. the tested emissions unit is tested under the highest load or capacity reasonably expected to occur for any of the emissions units that it represents;
- e. at least one of each different style of emissions unit at the facility is tested; and
- f. all add-on control devices are tested.

10. [40 CFR 63.1513(b)]  
The following equation shall be used to determine compliance with an emission limit for PM, HCl, and D/F:

$$E = (C \times Q \times K1) / P$$

where:

E = emission rate of PM, HCl, or D/F, kg/Mg (lb/ton) of feed;  
C = concentration of PM, HCl, or D/F, g/dscm (gr/dscf);  
Q = volumetric flow rate of exhaust gases, dscm/hr (dscf/hr);  
K1 = conversion factor, 1 kg/1,000 g (1 lb/7,000 gr); and  
P = production rate, Mg/hr (ton/hr).

11. [40 CFR 63.1513(e)]  
The equation contained in 40 CFR 63.1513(e)(1) shall be used to determine compliance with the mass-weighted particulate emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 1 in 40 CFR 63.1505 (k).

The equation contained in 40 CFR 63.1513(e)(2) shall be used to determine compliance with the aluminum mass-weighted HCl emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 2 in 40 CFR 63.1505 (k).

The equation contained in 40 CFR 63.1513(e)(3) shall be used to determine compliance with the aluminum mass-weighted D/F emission limits for a secondary aluminum processing unit. Compliance is achieved if the mass-weighted emissions for the secondary aluminum processing unit is less than or equal to the emission limit for the secondary aluminum processing unit calculated using Equation 3 in 40 CFR 63.1505 (k).

As an alternative to using the equations in this section, the permittee may demonstrate compliance for a secondary aluminum processing unit by demonstrating that each existing group 1 furnace is in compliance with the emission limits for a new group 1 furnace in 40 CFR 63.1505(i) and that each existing in-line fluxer is in compliance with the emission limits for a new in-line fluxer in 40 CFR 63.1505(j).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: P041 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**Facility ID: 0656000014 Emissions Unit ID: R001 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
DeVilbiss XDB-6580 spray booth	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	0.551 pound per hour of particulate emissions
	OAC rule 3745-21-07(G)(2)	none
		See A.I.2.a below.

**2. Additional Terms and Conditions**

- a. The permittee shall not employ any photochemically reactive material in this emissions unit.

(a)

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

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**II. Operational Restrictions**

- 1. The permittee shall employ a spray booth filter having a design control efficiency for particulates greater than

98% during any operation of the emissions unit.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each coating, thinner, and cleanup material employed; and
  - b. whether or not each coating, thinner, and cleanup material is a photochemically reactive material.
2. The permittee shall maintain daily records that document any time periods when the spray booth filter system was not in service when the emissions unit was in operation.

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.
2. The permittee shall notify the Director (the Ohio EPA, Southeast District Office) in writing of any daily record showing that the spray booth filter system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southeast District Office) within 30 days after the event occurs.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible emission limit shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
  - b. Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0656000014 Emissions Unit ID: R001 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

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.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

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**VI. Miscellaneous Requirements**

- 1. None