

Facility ID: 1431070580 Issuance type: Title V Proposed 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.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431070580 Issuance type: Title V Proposed Permit

Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. Willard Industries is exempt from 40 CFR, Part 63, Subpart RRR (Secondary Aluminum MACT) because the facility is not a secondary aluminum production facility as defined in 40 CFR 63.1503. The facility only uses clean charge and does not operate sweat furnaces, thermal chip dryers, or scrap dryers/delacquering kilns/decorating kilns.
2. The following insignificant emissions units are located at this facility:
 - F010 - 3 mmBtu/hr Natural Gas-Fired Reveratory Aluminum Melting Furnace (permit to install 14-5158)
 - F011 - 1.5 mmBtu/hr Natural Gas-Fired Aluminum Holding Furnace (permit to install 14-5158)
 - F018 - 1.5 mmBtu/hr Annealing Furnace #1
 - F019 - 1.5 mmBtu/hr Annealing Furnace #2
 - F020 - 1.5 mmBtu/hr Aging Furnace
 - F021 - 2.2 mmBtu/hr Natural-Gas Fired Crucible Furnace
 - F022 - Roadways and Parking Areas

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. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chpaters 3745-17, 3745-18, and/or 3745-21.
3. The permittee shall maintain, service, repair, or dispose of equipment containing any class I or class II substance used as refrigerant in such equipment pursuant to the applicable provisions of 40 CFR Part 82.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431070580 Issuance type: Title V Proposed Permit

b State Only Enforceable Section

1. None

- [Go to Part III for Emissions Unit F004](#)
- [Go to Part III for Emissions Unit F007](#)
- [Go to Part III for Emissions Unit F008](#)
- [Go to Part III for Emissions Unit F013](#)
- [Go to Part III for Emissions Unit F015](#)
- [Go to Part III for Emissions Unit F016](#)
- [Go to Part III for Emissions Unit F017](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431070580 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1431070580 Emissions Unit ID: F004 Issuance type: Title V Proposed 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>
LFP aluminum pouring, equipped with a baghouse	OAC rule 3745-31-05(A)(3) (PTI 14-05050)	See term A.1.2.a for organic compound (OC) emission limitations.
		See term A.1.2.b for the particulate emissions (PE)/PM-10 emission limitations.
		All fugitive dust captured by the ventilation system shall be vented to the baghouse which shall achieve an outlet loading of not greater than 0.030 grain of PE per dry standard cubic foot of exhaust gases and no visible PE from the baghouse exhaust stack.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and (B) and 3745-17-08(B)(3).
	OAC rule 3745-17-07(A)(1)	See term A.1.2.c.
	OAC rule 3745-17-07(B)(1)	See term A.1.2.d.
	OAC rule 3745-17-08(B)(3)	The collection efficiency of the ventilation system shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the points of capture to the extent possible with good engineering design.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- a. The hourly OC emissions from this emissions unit shall not exceed 16.11 lbs/hr*. The total combined hourly OC emissions from emissions units F004, F007, and F008 shall not exceed 16.11 lbs/hr.
- (a) The total combined OC emissions from emissions units F004, F007, and F008 shall not exceed 17.1 tons/yr, based upon a rolling, 12-month summation.
 - * The potential to emit for the lost foam pouring (LFP) line (emissions units F004, F007, and F008) is 16.11 lbs/hr. Therefore, the potential to emit for any one of the individual emissions units is assumed to be equivalent to the potential to emit for the entire line. In addition, no hourly record keeping is required to demonstrate compliance with this emission limitation.
- b. The total PE/PM10 emissions (fugitive+stack) from this emissions unit shall not exceed 4.44 tons/yr, based upon a rolling, 12-month summation.

- c. The visible PE from the stack associated with this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
- d. The visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity, as a three-minute average.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. Operational Restrictions

- 1. The emissions from this emissions unit shall be captured and vented to a baghouse in such a manner as to comply with the PE limitations and the visible emission limitations specified in this permit.
- 2. The maximum annual aluminum pouring rate for this emissions unit shall not exceed 4.5 million pounds per year, based upon a rolling, 12-month summation of the monthly aluminum pouring rates.
- 3. The pressure drop across the baghouse shall be maintained within the range of 0.50 to 10 inches of water while the emissions unit is in operation.
- 4. The maximum hours of operation for this emissions unit shall not exceed 4350 hours per year based on a rolling, 12-month summation. The purpose for the hours of operation per year limitation is to ensure compliance with the tons per year limitation for particulate emissions listed in A.1.2.b.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall calculate and maintain the following information each month for emissions units F004, F007 and F008, combined:
 - a. the amount of aluminum poured, recorded in pounds;
 - b. the rolling, 12-month summation for the amount of aluminum poured, recorded in pounds (the rolling, 12-month summation shall be calculated by adding the value recorded in line a. for the current month's production to the value recorded in line a. for the previous 11-month's operation);
 - c. the total monthly OC emissions, in pounds, calculated by multiplying the total amount of aluminum poured (a), by the company emissions factor of 15.2 lb of OC/ton of aluminum poured;*
 - d. the rolling, 12-month OC emissions, in tons (the rolling, 12-month summation shall be calculated by adding the value recorded in line c. for the current month's production to the value recorded in line c. for the previous 11-month's operation).

(*The lbs of OC/ton of aluminum poured emission factor was based on source-specific testing results performed at Willard Industries on April 25, 2000 and September 13, 2000. See Permit to Install 14-05050 for the derivation of this emission factor.)
- 2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). An audible alarm shall be maintained to notify the permittee of deviations of the baghouse pressure drop range specified in term A.II.3 while this emissions unit is in operation. An interlock system shall be operated that discontinues the lost foam pouring operation during periods of time when the baghouse is operating outside the pressure drop range specified in term A.II.3.
- 3. The permittee shall perform an inspection of the collection and control system on a weekly basis. The purpose of this inspection is to ensure its proper functioning. At a minimum this inspection shall include a visible check of the hood and duct systems leading to the baghouse, a check for the presence of excessive fugitive visible emissions, and a check for the presence of visible emissions from the stack associated with this emissions unit. The results of this inspection shall be recorded in a log book. Any problems noted during the inspection and the corrective actions necessary to remedy the problems should also be noted in the log book.
- 4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust at the points of egress 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 location and 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 minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

5. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse 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. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
6. The permittee shall collect and record the following information on a monthly basis for emissions unit F004:
 - a. the total hours of operation during the month; and
 - b. the rolling, 12-month summation for the hours of operation for this emission unit. The rolling, 12-month summation shall be calculated by adding the value recorded in line a. for the current month's production to the value recorded in line a. for the previous 11-month's operation.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
 - a. each exceedance of the rolling, 12-month aluminum pouring limitation of 4.5 million pounds;
 - b. all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.3;
 - c. each exceedance of the rolling, 12-month OC emission limitation of 17.1 tons (for emission units F004, F007 and F008, combined);
 - d. each week during which the inspection of the collection and control system did not take place and the reason for not performing the inspection; and
 - e. each exceedance of the hours of operation restriction of 4350 hours per year based on a rolling, 12-month summation.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.
2. The permittee shall submit annual reports that specify the total, combined, OC emissions from emission units F004, F007 and F008.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed at the points of egress serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. Testing Requirements

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

16.11 lbs of OC/hour from this emissions unit and 16.11 lbs of OC/hour for emissions units F004, F007, and F008 combined.

Applicable Compliance Method:
Compliance with the hourly allowable OC emission limitations is demonstrated based upon the emissions unit's potential to emit as described in A.I.2.a of this permit (see PTI 14-05050 for the detailed calculation of the potential to emit).

Additionally, compliance with the lbs of OC/hr emission limitation was demonstrated during stack testing conducted on April 25, 2000 and September 13, 2000.

If required, compliance with the hourly OC emission limitation shall be demonstrated by stack testing conducted in accordance with Method 18, 25, or 25A of 40 CFR, Part 60, Appendix A.
 - b. Emission Limitations:

17.1 TPY of OC from F004, F007, and F008 combined

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be demonstrated based on the record keeping requirements established in section A.III of this permit.

c. Emission Limitations:

0.030 grain of PE per dry standard cubic foot (gr/dscf) of exhaust gases from the baghouse controlling this emissions unit and 4.44 TPY PE/PM10

Applicable Compliance Method:

Compliance with the annual PE limitation may be determined by multiplying the grain loading limitation* of 0.030 gr PE/dscf by the maximum exhaust gas flow rate from the baghouse (dscf/minute) by 60 min/hr, and by 4350 hrs/yr, and then dividing by 7000 gr/lb and 2000 lbs/ton.

Additionally, compliance with the gr/dscf emission limitation was demonstrated during a stack test conducted on 1/16/02 when an emission rate of 0.0022 gr/dscf was determined.

Also, during the 1/16/02 stack test an emission rate of 0.63 lb PE/hr was determined. This hourly emission rate multiplied by the hours of operation recorded in A.III.5. divided by 2000 lbs/ton may be used to demonstrate compliance with the TPY emission limitation.

If required, compliance with the grain loading emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

e. Emission Limitation:

Visible emissions of fugitive dust shall not exceed twenty percent opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR, Part 60, Method 9 and the procedures in OAC rule 3745-17-03(B)(3).

The Method 9 readings to determine compliance with this visible emission limitation shall be taken at the points of egress to the atmosphere.

f. Material Usage Limitation:

Maximum annual aluminum pouring rate for this emissions unit shall not exceed 4.5 million pounds per year, based upon a rolling, 12-month summation of the aluminum pouring rate.

Applicable Compliance Method:

Compliance with the usage limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

g. Hours of operation restriction:

Maximum hours of operation for this emissions unit shall not exceed 4350 hours per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the hours of operation restriction above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. Miscellaneous Requirements

1. Emissions units F004, F007, F008, F013, F015, and F016 are vented to a common baghouse.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431070580 Issuance type: Title V Proposed Permit

[Go to the top of this document](#)

Facility ID: 1431070580 Emissions Unit ID: F004 Issuance type: Title V Proposed 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>
---	--------------------------------------	--

LFP aluminum pouring equipped with a baghouse

2. Additional Terms and Conditions

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. Operational Restrictions

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. Monitoring and/or Record Keeping Requirements

- 1. The permit to install for this emissions unit F004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene
 TLV(ug/m3): 1594
 Maximum Hourly Emission Rate (lbs/hr): 0.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2.3
 MAGLC (ug/m3): 38

Pollutant: Ethylbenzene
 TLV (ug/m3): 433,306
 Maximum Hourly Emission Rate (lbs/hr): 2.17
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 49
 MAGLC (ug/m3): 10,317

Pollutant: Methylstyrene
 TLV (ug/m3): 241,184
 Maximum Hourly Emission Rate (lbs/hr): 0.77
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17
 MAGLC (ug/m3): 5742

Pollutant: Styrene
 TLV (ug/m3): 85,200
 Maximum Hourly Emission Rate (lbs/hr): 11.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 258
 MAGLC (ug/m3): 2029

Pollutant: Toluene
 TLV (ug/m3): 188,020
 Maximum Hourly Emission Rate (lbs/hr): 0.73
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17
 MAGLC (ug/m3): 4477

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in

emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. Testing Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. Miscellaneous Requirements

- 1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431070580 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1431070580 Emissions Unit ID: F007 Issuance type: Title V Proposed 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>
LFP sand shakeout, equipped with a baghouse	OAC rule 3745-31-05(A)(3) (PTI 14-05050)	See term A.I.2.a for organic compound (OC) emission limitations. See term A.I.2.b for the particulate emissions (PE)/PM-10 emission limitations. All fugitive dust captured by the ventilation system

shall be vented to the baghouse which shall achieve an outlet loading of not greater than 0.030 grain of PE per dry standard cubic foot of exhaust gases and no visible PE from the baghouse exhaust stack.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and (B) and 3745-17-08(B)(3).

OAC rule 3745-17-07(A)(1)

See term A.I.2.c.

OAC rule 3745-17-07(B)(1)

See term A.I.2.d.

OAC rule 3745-17-08(B)(3)

The collection efficiency of the ventilation system shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the points of capture to the extent possible with good engineering design.

OAC rule 3745-17-11(B)

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- a. The hourly OC emissions from this emissions unit shall not exceed 16.11 lbs/hr*. The total combined hourly OC emissions from emissions units F004, F007, and F008 shall not exceed 16.11 lbs/hr.
- (a) The total combined OC emissions from emissions units F004, F007, and F008 shall not exceed 17.1 tons/yr, based upon a rolling, 12-month summation.
 - * The potential to emit for the lost foam pouring (LFP) line (emissions units F004, F007, and F008) is 16.11 lbs/hr. Therefore, the potential to emit for any one of the individual emissions units is assumed to be equivalent to the potential to emit for the entire line. In addition, no hourly record keeping is required to demonstrate compliance with this emission limitation.
- b. The total PE/PM10 emissions (fugitive+stack) from this emissions unit shall not exceed 2.21 tons/yr, based upon a rolling, 12-month summation.
- c. The visible PE from the stack associated with this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
- d. The visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity, as a three-minute average.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. Operational Restrictions

- 1. The emissions from this emissions unit shall be captured and vented to a baghouse in such a manner as to comply with the PE limitations and the visible emission limitations specified in this permit.
- 2. The maximum annual aluminum pouring rate for this emissions unit shall not exceed 4.5 million pounds per year, based upon a rolling, 12-month summation of the monthly aluminum pouring rates.
- 3. The pressure drop across the baghouse shall be maintained within the range of 0.50 to 10 inches of water while the emissions unit is in operation.
- 4. The maximum hours of operation for this emissions unit shall not exceed 4350 hours per year based on a rolling, 12-month summation. The purpose for the hours of operation per year limitation is to ensure compliance with the tons per year limitation for particulate emissions listed in A.I.2.b.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall calculate and maintain the following information each month for emissions units F004, F007 and F008, combined:
 - a. the amount of aluminum poured, recorded in pounds;
 - b. the rolling, 12-month summation for the amount of aluminum poured, recorded in pounds (the rolling, 12-month summation shall be calculated by adding the value recorded in line a. for the current month's production to the value recorded in line a. for the previous 11-month's operation);
 - c. the total monthly OC emissions, in pounds, calculated by multiplying the total amount of aluminum poured (a), by the company emissions factor of 15.2 lb of OC/ton of aluminum poured;*
 - d. the rolling, 12-month OC emissions, in tons (the rolling, 12-month summation shall be calculated by adding the value recorded in line c. for the current month's production to the value recorded in line c. for the previous 11-month's operation).

(*The lbs of OC/ton of aluminum poured emission factor was based on source-specific testing results

performed at Willard Industries on April 25, 2000 and September 13, 2000. See Permit to Install 14-05050 for the derivation of this emission factor.)

2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). An audible alarm shall be maintained to notify the permittee of deviations of the baghouse pressure drop range specified in term A.II.3 while this emissions unit is in operation. An interlock system shall be operated that discontinues the lost foam pouring operation during periods of time when the baghouse is operating outside the pressure drop range specified in term A.II.3.
3. The permittee shall perform an inspection of the collection and control system on a weekly basis. The purpose of this inspection is to ensure its proper functioning. At a minimum this inspection shall include a visible check of the hood and duct systems leading to the baghouse, a check for the presence of excessive fugitive visible emissions, and a check for the presence of visible emissions from the stack associated with this emissions unit. The results of this inspection shall be recorded in a log book. Any problems noted during the inspection and the corrective actions necessary to remedy the problems should also be noted in the log book.
4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust at the point of egress 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 location and 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 minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.
5. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse 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. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
6. The permittee shall collect and record the following information on a monthly basis for emissions unit F004:
 - a. the total hours of operation during the month; and
 - b. the rolling, 12-month summation for the hours of operation for this emission unit. The rolling, 12-month summation shall be calculated by adding the value recorded in line a. for the current month's production to the value recorded in line a. for the previous 11-month's operation.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

*****THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.*****

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
 - a. each exceedance of the rolling, 12-month aluminum pouring limitation of 4.5 million pounds;
 - b. all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.3;
 - c. each exceedance of the rolling, 12-month OC emission limitation of 17.1 tons (for emission units F004, F007 and F008, combined);
 - d. each week during which the inspection of the collection and control system did not take place and the reason for not performing the inspection; and
 - e. each exceedance of the hours of operation restriction of 4350 hours per year based on a rolling, 12-month summation.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.
2. The permittee shall submit annual reports that specify the total, combined, OC emissions from emission units F004, F007 and F008.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible

- emissions of fugitive dust were observed at the points of egress serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. Compliance with the emission limitations and the operational restrictions specified in Sections A.I.1 and A.II of these terms and conditions shall be determined in accordance with the following methods:
- a. **Emission Limitation:**
16.11 lbs of OC/hour from this emissions unit and 16.11 lbs of OC/hour for emissions units F004, F007, and F008 combined.
- Applicable Compliance Method:**
Compliance with the hourly allowable OC emission limitations is demonstrated based upon the emissions unit's potential to emit as described in A.I.2.a of this permit (see PTI 14-05050 for the detailed calculation of the potential to emit).
- Additionally, compliance with the lbs of OC/hr emission limitation was demonstrated during stack testing conducted on April 25, 2000 and September 13, 2000.
- If required, compliance with the hourly OC emission limitation shall be demonstrated by stack testing conducted in accordance with Method 18, 25, or 25A of 40 CFR, Part 60, Appendix A.
- b. **Emission Limitations:**
17.1 TPY of OC from F004, F007, and F008 combined
- Applicable Compliance Method:**
Compliance with the annual allowable OC emission limitation shall be demonstrated based on the record keeping requirements established in section A.III of this permit.
- c. **Emission Limitations:**
0.030 grain of PE per dry standard cubic foot (gr/dscf) of exhaust gases from the baghouse controlling this emissions unit and 4.44 TPY PE/PM10
- Applicable Compliance Method:**
Compliance with the annual PE limitation may be determined by multiplying the grain loading limitation* of 0.030 gr PE/dscf by the maximum exhaust gas flow rate from the baghouse (dscf/minute) by 60 min/hr, and by 4350 hrs/yr, and then dividing by 7000 gr/lb and 2000 lbs/ton.
- Additionally, compliance with the gr/dscf emission limitation was demonstrated during a stack test conducted on 1/16/02 when an emission rate of 0.0022 gr/dscf was determined.
- Also, during the 1/16/02 stack test an emission rate of 0.63 lb PE/hr was determined. This hourly emission rate multiplied by the hours of operation recorded in A.III.5. divided by 2000 lbs/ton may be used to demonstrate compliance with the TPY emission limitation.
- If required, compliance with the grain loading emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.
- d. **Emission Limitation:**
Visible PE shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
- Applicable Compliance Method:**
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).
- e. **Emission Limitation:**
Visible emissions of fugitive dust shall not exceed twenty percent opacity, as a three-minute average.
- Applicable Compliance Method:**
If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR, Part 60, Method 9 and the procedures in OAC rule 3745-17-03(B)(3).
- The Method 9 readings to determine compliance with this visible emission limitation shall be taken at the points of egress to the atmosphere.
- f. **Material Usage Limitation:**
Maximum annual aluminum pouring rate for this emissions unit shall not exceed 4.5 million pounds per year, based upon a rolling, 12-month summation of the aluminum pouring rate.

Applicable Compliance Method:

Compliance with the usage limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

- g. Hours of operation restriction:
Maximum hours of operation for this emissions unit shall not exceed 4350 hours per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the hours of operation restriction above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

- 1. Emissions units F004, F007, F008, F013, F015, and F016 are vented to a common baghouse.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431070580 Issuance type: Title V Proposed Permit

[Go to the top of this document](#)

Facility ID: 1431070580 Emissions Unit ID: F007 Issuance type: Title V Proposed 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>
---	--------------------------------------	--

LFP sand shakeout, equipped with a baghouse		
---	--	--

2. **Additional Terms and Conditions**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

- 1. The permit to install for this emissions unit F004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene
TLV(ug/m3): 1594
Maximum Hourly Emission Rate (lbs/hr): 0.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2.3
 MAGLC (ug/m3): 38

Pollutant: Ethylbenzene
 TLV (ug/m3): 433,306
 Maximum Hourly Emission Rate (lbs/hr): 2.17
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 49
 MAGLC (ug/m3): 10,317

Pollutant: Methylstyrene
 TLV (ug/m3): 241,184
 Maximum Hourly Emission Rate (lbs/hr): 0.77
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17
 MAGLC (ug/m3): 5742

Pollutant: Styrene
 TLV (ug/m3): 85,200
 Maximum Hourly Emission Rate (lbs/hr): 11.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 258
 MAGLC (ug/m3): 2029

Pollutant: Toluene
 TLV (ug/m3): 188,020
 Maximum Hourly Emission Rate (lbs/hr): 0.73
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17
 MAGLC (ug/m3): 4477

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. Testing Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. Miscellaneous Requirements

- 1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431070580 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1431070580 Emissions Unit ID: F008 Issuance type: Title V Proposed 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>
LFP sand handling, equipped with a baghouse	OAC rule 3745-31-05(A)(3) (PTI 14-05050)	See term A.I.2.a for organic compound (OC) emission limitations. See term A.I.2.b for the particulate emissions (PE)/PM-10 emission limitations.
		All fugitive dust captured by the ventilation system shall be vented to the baghouse which shall achieve an outlet loading of not greater than 0.030 grain of PE per dry standard cubic foot of exhaust gases and no visible PE from the baghouse exhaust stack.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and (B) and 3745-17-08(B)(3). See term A.I.2.c. See term A.I.2.d.
		The collection efficiency of the ventilation system shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the points of capture to the extent possible with good engineering design. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- a. The hourly OC emissions from this emissions unit shall not exceed 16.11 lbs/hr*. The total combined hourly OC emissions from emissions units F004, F007, and F008 shall not exceed 16.11 lbs/hr.
- (a) The total combined OC emissions from emissions units F004, F007, and F008 shall not exceed 17.1 tons/yr, based upon a rolling, 12-month summation.

* The potential to emit for the lost foam pouring (LFP) line (emissions units F004, F007, and F008) is 16.11 lbs/hr. Therefore, the potential to emit for any one of the individual emissions units is assumed to be equivalent to the potential to emit for the entire line. In addition, no hourly record keeping is required to demonstrate compliance with this emission limitation.
- b. The total PE/PM10 emissions (fugitive+stack) from this emissions unit shall not exceed 8.24 tons/yr, based upon a rolling, 12-month summation.
- c. The visible PE from the stack associated with this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
- d. The visible emissions of fugitive dust from this emissions unit shall not exceed 20% opacity, as a three-minute average.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. The emissions from this emissions unit shall be captured and vented to a baghouse in such a manner as to comply with the PE limitations and the visible emission limitations specified in this permit.
2. The maximum annual aluminum pouring rate for this emissions unit shall not exceed 4.5 million pounds per year, based upon a rolling, 12-month summation of the monthly aluminum pouring rates.
3. The pressure drop across the baghouse shall be maintained within the range of 0.50 to 10 inches of water while the emissions unit is in operation.
4. The maximum hours of operation for this emissions unit shall not exceed 4350 hours per year based on a rolling, 12-month summation. The purpose for the hours of operation per year limitation is to ensure compliance with the tons per year limitation for particulate emissions listed in A.I.2.b.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. The permittee shall calculate and maintain the following information each month for emissions units F004, F007 and F008, combined:
 - a. the amount of aluminum poured, recorded in pounds;
 - b. the rolling, 12-month summation for the amount of aluminum poured, recorded in pounds (the rolling, 12-month summation shall be calculated by adding the value recorded in line a. for the current month's production to the value recorded in line a. for the previous 11-month's operation);
 - c. the total monthly OC emissions, in pounds, calculated by multiplying the total amount of aluminum poured (a), by the company emissions factor of 15.2 lb of OC/ton of aluminum poured;*
 - d. the rolling, 12-month OC emissions, in tons (the rolling, 12-month summation shall be calculated by adding the value recorded in line c. for the current month's production to the value recorded in line c. for the previous 11-month's operation).(*The lbs of OC/ton of aluminum poured emission factor was based on source-specific testing results performed at Willard Industries on April 25, 2000 and September 13, 2000. See Permit to Install 14-05050 for the derivation of this emission factor.)
2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). An audible alarm shall be maintained to notify the permittee of deviations of the baghouse pressure drop range specified in term A.II.3 while this emissions unit is in operation. An interlock system shall be operated that discontinues the lost foam pouring operation during periods of time when the baghouse is operating outside the pressure drop range specified in term A.II.3.
3. The permittee shall perform an inspection of the collection and control system on a weekly basis. The purpose of this inspection is to ensure its proper functioning. At a minimum this inspection shall include a visible check of the hood and duct systems leading to the baghouse, a check for the presence of excessive fugitive visible emissions, and a check for the presence of visible emissions from the stack associated with this emissions unit. The results of this inspection shall be recorded in a log book. Any problems noted during the inspection and the corrective actions necessary to remedy the problems should also be noted in the log book.
4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust at the point of egress 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 location and 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 minimize or eliminate the visible emissions.If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.
5. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse 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. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

6. The permittee shall collect and record the following information on a monthly basis for emissions unit F004:
 - a. the total hours of operation during the month; and
 - b. the rolling, 12-month summation for the hours of operation for this emission unit. The rolling, 12-month summation shall be calculated by adding the value recorded in line a. for the current month's production to the value recorded in line a. for the previous 11-month's operation.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following information:
 - a. each exceedance of the rolling, 12-month aluminum pouring limitation of 4.5 million pounds;
 - b. all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.3;
 - c. each exceedance of the rolling, 12-month OC emission limitation of 17.1 tons (for emission units F004, F007 and F008, combined);
 - d. each week during which the inspection of the collection and control system did not take place and the reason for not performing the inspection; and
 - e. each exceedance of the hours of operation restriction of 4350 hours per year based on a rolling, 12-month summation.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.
2. The permittee shall submit annual reports that specify the total, combined, OC emissions from emission units F004, F007 and F008.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed at the points of egress serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. Testing Requirements

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

16.11 lbs of OC/hour from this emissions unit and 16.11 lbs of OC/hour for emissions units F004, F007, and F008 combined.

Applicable Compliance Method:
Compliance with the hourly allowable OC emission limitations is demonstrated based upon the emissions unit's potential to emit as described in A.I.2.a of this permit (see PTI 14-05050 for the detailed calculation of the potential to emit).

Additionally, compliance with the lbs of OC/hr emission limitation was demonstrated during stack testing conducted on April 25, 2000 and September 13, 2000.

If required, compliance with the hourly OC emission limitation shall be demonstrated by stack testing conducted in accordance with Method 18, 25, or 25A of 40 CFR, Part 60, Appendix A.
 - b. Emission Limitations:

17.1 TPY of OC from F004, F007, and F008 combined

Applicable Compliance Method:
Compliance with the annual allowable OC emission limitation shall be demonstrated based on the record keeping requirements established in section A.III of this permit.
 - c. Emission Limitations:

0.030 grain of PE per dry standard cubic foot (gr/dscf) of exhaust gases from the baghouse controlling this emissions unit and 4.44 TPY PE/PM10

Applicable Compliance Method:

Compliance with the annual PE limitation may be determined by multiplying the grain loading limitation* of 0.030 gr PE/dscf by the maximum exhaust gas flow rate from the baghouse (dscf/minute) by 60 min/hr, and by 4350 hrs/yr, and then dividing by 7000 gr/lb and 2000 lbs/ton.

Additionally, compliance with the gr/dscf emission limitation was demonstrated during a stack test conducted on 1/16/02 when an emission rate of 0.0022 gr/dscf was determined.

Also, during the 1/16/02 stack test an emission rate of 0.63 lb PE/hr was determined. This hourly emission rate multiplied by the hours of operation recorded in A.III.5. divided by 2000 lbs/ton may be used to demonstrate compliance with the TPY emission limitation.

If required, compliance with the grain loading emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

e. Emission Limitation:

Visible emissions of fugitive dust shall not exceed twenty percent opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with 40 CFR, Part 60, Method 9 and the procedures in OAC rule 3745-17-03(B)(3).

The Method 9 readings to determine compliance with this visible emission limitation shall be taken at the points of egress to the atmosphere.

f. Material Usage Limitation:

Maximum annual aluminum pouring rate for this emissions unit shall not exceed 4.5 million pounds per year, based upon a rolling, 12-month summation of the aluminum pouring rate.

Applicable Compliance Method:

Compliance with the usage limitation above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

g. Hours of operation restriction:

Maximum hours of operation for this emissions unit shall not exceed 4350 hours per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the hours of operation restriction above shall be based on the record keeping requirements established in section A.III of the terms and conditions of this permit.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. Miscellaneous Requirements

1. Emissions units F004, F007, F008, F013, F015, and F016 are vented to a common baghouse.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431070580 Issuance type: Title V Proposed Permit

[Go to the top of this document](#)

Facility ID: 1431070580 Emissions Unit ID: F008 Issuance type: Title V Proposed 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>
LFP sand handling, equipped with a baghouse		
2. Additional Terms and Conditions		
1. None		

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. Operational Restrictions

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit F004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Benzene
 TLV(ug/m3): 1594
 Maximum Hourly Emission Rate (lbs/hr): 0.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2.3
 MAGLC (ug/m3): 38

Pollutant: Ethylbenzene
 TLV (ug/m3): 433,306
 Maximum Hourly Emission Rate (lbs/hr): 2.17
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 49
 MAGLC (ug/m3): 10,317

Pollutant: Methylstyrene
 TLV (ug/m3): 241,184
 Maximum Hourly Emission Rate (lbs/hr): 0.77
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17
 MAGLC (ug/m3): 5742

Pollutant: Styrene
 TLV (ug/m3): 85,200
 Maximum Hourly Emission Rate (lbs/hr): 11.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 258
 MAGLC (ug/m3): 2029

Pollutant: Toluene
 TLV (ug/m3): 188,020
 Maximum Hourly Emission Rate (lbs/hr): 0.73
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17
 MAGLC (ug/m3): 4477

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. Testing Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. Miscellaneous Requirements

- 1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431070580 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1431070580 Emissions Unit ID: F013 Issuance type: Title V Proposed 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>
casting shotblast #1 (Wheelabrator), equipped with a baghouse	OAC rule 3745-31-05(A)(3) (PTI 14-05158)	0.24 lb of particulate emissions (PE)/PM10/hr* 1.1 tons/yr of PE/PM10*
	OAC rule 3745-17-07(A)(1)	Visible PE from the stack associated with this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established

*The PE limitations for this emissions unit are based on the emissions unit's potential to emit (PTE). Therefore, no hourly record keeping is required to demonstrate compliance with these emission limitations.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).

Visible PE from the stack associated with this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

The emission limitation specified by this rule is less stringent than the emission limitation established

pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- a. All PE from this emissions unit shall be vented to the baghouse.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 0.50 to 10 inches of water while the emissions unit is in operation.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform an inspection of the collection and control system on a weekly basis. The purpose of this inspection is to ensure its proper functioning. The results of this inspection shall be recorded in a log book.
2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). An audible alarm shall be maintained to notify the permittee of deviations of the baghouse pressure drop range specified in term A.II.1 while this emissions unit is in operation. An interlock system shall be operated that discontinues operation of this emissions unit during periods of time when the baghouse is operating outside the pressure drop range specified in term A.II.1.
3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse 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. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each week when the inspection of the collection and control system does not take place and the reason for not performing the inspection.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.1.
3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.
4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. Testing Requirements

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

- a. Emission Limitations:
0.24 lb/hr of PE/PM10, 1.1 tons/yr of PE/PM10

Applicable Compliance Method:

Compliance with the hourly PE limitation of 0.24 lb/hr may be demonstrated by multiplying an emission factor of 0.0022 grain/dscf * by the air flow rate of 2700 dscf/min and by 60 min/hr, and then dividing by 7000 grains/lb.

$(0.0022 \text{ grain/dscf} \times 2700 \text{ dscf/min} \times 60 \text{ min/hr} / 7000 \text{ grain/lb} = .051 \text{ lb of PE/hr})$

*The emission factor of 0.0022 gr/dscf is based on stack testing conducted at the facility on 1/16/02 for a similar source.

Compliance with the annual PE limitation of 1.1 tons/yr may be demonstrated by multiplying the maximum hourly emission rate of 0.051 lb of PE/hr by 8760 hr/yr and then dividing by 2000 lbs/ton.

(0.051 lb of PE/hr x 8760 hr/yr / 2000 lbs/ton = .22 ton/yr of PE)

If required, compliance with the hourly PE limitation shall be demonstrated by stack testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

- 1. Emissions units F004, F007, F008, F013, F015, and F016 are vented to a common baghouse.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431070580 Issuance type: Title V Proposed Permit

[Go to the top of this document](#)

Facility ID: 1431070580 Emissions Unit ID: F013 Issuance type: Title V Proposed 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. Additional Terms and Conditions			
1.	None		

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

- 1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431070580 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1431070580 Emissions Unit ID: F015 Issuance type: Title V Proposed 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>
casting shotblast #2 (Goff), equipped with a baghouse	OAC rule 3745-31-05(A)(3) (PTI 14-05158)	0.10 lb of particulate emissions (PE)/PM10/hr* 0.44 ton/yr of PE/PM10*

*The PE limitations for this emissions unit are based on the emissions unit's potential to emit (PTE). Therefore, no hourly record keeping is required to demonstrate compliance with these emission limitations.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).

Visible PE from the stack associated with this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

- a. All PE from this emissions unit shall be vented to the baghouse.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

- 1. The pressure drop across the baghouse shall be maintained within the range of 0.50 to 10 inches of water while the emissions unit is in operation.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

- 1. The permittee shall perform an inspection of the collection and control system on a weekly basis. The purpose of this inspection is to ensure its proper functioning. The results of this inspection shall be recorded in a log book.
- 2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). An audible alarm shall be maintained to notify the permittee of deviations of the

baghouse pressure drop range specified in term A.II.1 while this emissions unit is in operation. An interlock system shall be operated that discontinues operation of this emissions unit during periods of time when the baghouse is operating outside the pressure drop range specified in term A.II.1.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse 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. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each week when the inspection of the collection and control system does not take place and the reason for not performing the inspection.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.1.
3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.
4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitations:
0.10 lb/hr of PE/PM10, 0.44 ton/yr of PE/PM10

Applicable Compliance Method:
Compliance with the hourly PE limitation of 0.10 lb/hr may be demonstrated by multiplying an emission factor of 0.0022 grain/dscf * by the air flow rate of 800 dscf/min and by 60 min/hr, and then dividing by 7000 grains/lb.

$$(0.0022 \text{ grain/dscf} \times 800 \text{ dscf/min} \times 60 \text{ min/hr} / 7000 \text{ grain/lb} = .015 \text{ lb of PE/hr})$$

*The emission factor of 0.0022 gr/dscf is based on stack testing conducted at the facility on 1/16/02 for a similar source.

Compliance with the annual PE limitation of 0.44 ton/yr may be demonstrated by multiplying the maximum hourly emission rate of 0.015 lb of PE/hr by 8760 hr/yr and then dividing by 2000 lbs/ton.

$$(0.015 \text{ lb of PE/hr} \times 8760 \text{ hr/yr} / 2000 \text{ lbs/ton} = .07 \text{ ton/yr of PE})$$

If required, compliance with the hourly PE limitation shall be demonstrated by stack testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.
 - b. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. Miscellaneous Requirements

1. Emissions units F004, F007, F008, F013, F015, and F016 are vented to a common baghouse.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431070580 Issuance type: Title V Proposed Permit

[Go to the top of this document](#)

Facility ID: 1431070580 Emissions Unit ID: F015 Issuance type: Title V Proposed 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. Additional Terms and Conditions		
1. None		

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. Operational Restrictions

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. Monitoring and/or Record Keeping Requirements

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. Testing Requirements

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. Miscellaneous Requirements

1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431070580 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1431070580 Emissions Unit ID: F016 Issuance type: Title V Proposed 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>
casting shotblast #2 (glass bead), equipped with a baghouse	OAC rule 3745-31-05(A)(3) (PTI 14-05158)	0.10 lb of particulate emissions (PE)/PM10/hr* 0.44 ton/yr of PE/PM10*
	OAC rule 3745-17-07(A)(1)	*The PE limitations for this emissions unit are based on the emissions unit's potential to emit (PTE). Therefore, no hourly record keeping is required to demonstrate compliance with these emission limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1). Visible PE from the stack associated with this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

- a. All PE from this emissions unit shall be vented to the baghouse.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 0.50 to 10 inches of water while the emissions unit is in operation.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. The permittee shall perform an inspection of the collection and control system on a weekly basis. The purpose of this inspection is to ensure its proper functioning. The results of this inspection shall be recorded in a log book.
2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). An audible alarm shall be maintained to notify the permittee of deviations of the baghouse pressure drop range specified in term A.II.1 while this emissions unit is in operation. An interlock system shall be operated that discontinues operation of this emissions unit during periods of time when the baghouse is operating outside the pressure drop range specified in term A.II.1.
3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse 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. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each week when the inspection of the collection and control system does not take place and the reason for not performing the inspection.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.1.
3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.
4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible

particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

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

a. Emission Limitations:
0.10 lb/hr of PE/PM10, 0.44 ton/yr of PE/PM10

Applicable Compliance Method:
Compliance with the hourly PE limitation of 0.10 lb/hr may be demonstrated by multiplying an emission factor of 0.0022 grain/dscf * by the air flow rate of 900 dscf/min and by 60 min/hr, and then dividing by 7000 grains/lb.

$$(0.0022 \text{ grain/dscf} \times 900 \text{ dscf/min} \times 60 \text{ min/hr} / 7000 \text{ grain/lb} = .017 \text{ lb of PE/hr})$$

*The emission factor of 0.0022 gr/dscf is based on stack testing conducted at the facility on 1/16/02 for a similar source.

Compliance with the annual PE limitation of 0.44 ton/yr may be demonstrated by multiplying the maximum hourly emission rate of 0.017 lb of PE/hr by 8760 hr/yr and then dividing by 2000 lbs/ton.

$$(0.017 \text{ lb of PE/hr} \times 8760 \text{ hr/yr} / 2000 \text{ lbs/ton} = .07 \text{ ton/yr of PE})$$

If required, compliance with the hourly PE limitation shall be demonstrated by stack testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. Emissions units F004, F007, F008, F013, F015, and F016 are vented to a common baghouse.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431070580 Issuance type: Title V Proposed Permit

[Go to the top of this document](#)

Facility ID: 1431070580 Emissions Unit ID: F016 Issuance type: Title V Proposed 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. **Additional Terms and Conditions**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. Operational Restrictions

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. Monitoring and/or Record Keeping Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. Testing Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. Miscellaneous Requirements

- 1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431070580 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1431070580 Emissions Unit ID: F017 Issuance type: Title V Proposed 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>
5.5 mmBtu/hr natural gas-fired melting furnace	OAC rule 3745-31-05(A)(3) (PTI 14-05367)	1.32 lbs of particulate emissions (PE)/PM10 emissions/hr* 5.78 tons/yr of PE/PM10 emissions * 0.83 lb of NOx/hr* 3.64 tons/yr of NOx* 0.006 lb of SO2/hr* 0.026 ton/yr of SO2* 0.022 lb of CO/hr* 0.1 ton/yr of CO* 0.039 lb of volatile organic compounds (VOC)/hr* 0.17 ton/yr of VOC*

* The hourly and ton/yr emission limitations outlined above are based on the emissions unit's potentials to emit (PTE). Therefore, no hourly record keeping or additional monitoring or reporting requirements are necessary to demonstrate compliance with these emission limitations.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-21-08 and 3745-23-06.

OAC rule 3745-17-07(A)(1)	The visible PE from any stack associated with this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-18-06(E)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-08(B)	None, see A.I.2.b below.
OAC rule 3745-23-06(B)	None, see A.I.2.c below.

2. Additional Terms and Conditions

- a. As defined in 40 CFR 63.1503, any facility that only uses clean charge and does not operate sweat furnaces, thermal chip dryers, or scrap dryers/delacquering kilns/decorating kilns is not a secondary aluminum production facility.
- b. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 14-05367.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- c. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 14-05367.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. Operational Restrictions

- 1. The permittee shall only use clean charge in this emissions unit as defined in 40 CFR Part 63, Subpart RRR:

Clean charge means furnace charge materials including molten aluminum, T-bar, sow, ingot, billet, pig and alloying elements; aluminum scrap known by the owner or operator to be entirely free of paints, coatings, and lubricants; uncoated/unpainted aluminum chips that have been thermally dried or treated by a centrifugal cleaner; aluminum scrap dried at 343 degrees C (650 degrees F) or higher; aluminum scrap delacquered/decoated at 482 degrees C (900 degrees F) or higher; and runaround scrap.
- 2. The permittee shall burn only natural gas in this emissions unit.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain the following records:
 - a. Records that describe all of the charge materials.
 - b. Records that no sweat furnaces, thermal chip dryers, or scrap dryers/delacquering kilns/decorating kilns are in operation.
- 2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- 3. The permittee shall 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. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when "clean charge" is not used in this emissions unit. This report shall be submitted within 30 days after the deviation occurs.
2. 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.
3. The permittee shall submit semiannual written reports that (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 Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:
1.32 lbs of PE/PM10/hr, 5.78 tons/yr of PE/PM10

Applicable Compliance Method:
The hourly limit is determined by summing the emissions from the melting aluminum, fluxing agent, and combustion of natural gas. The particulate emissions from melting aluminum may be determined by multiplying the emission factor, 1.1 lb/ton [derived from STAPPA/ALAPCO Air Quality Permits - A Handbook for Regulators and Industry, Volume II, Table 11-2 (5/30/91)], by the maximum rate of melting, 1 ton/hr. The particulate emissions from the fluxing agent may be determined by multiplying the emission factor, 50 lb/ton [OEPA RACM guide, Table 2.11-1], by the amount of fluxing agent added per hour, 5 lb/hr, and dividing by 2000 lb/ton. The combustion of natural gas emissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 particulate emission factor for natural gas (1.9 lbs of filterable particulate matter/mmcf) from Section 1.4, Table 1.4-2, 7/98.

The annual emissions may be determined by multiplying the hourly emission rate by 8760 hr/yr and dividing by 2000 lb/ton.

If required, compliance with the lbs/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.
 - c. Emission Limitation:
0.83 lb of NOx/hr, 3.64 tons/yr of NOx

Applicable Compliance Method:
The hourly emissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 nitrogen oxides emission factor for natural gas (100 lbs of nitrogen oxides/mmcf) from Section 1.4, Table 1.4-1, 7/98.

The annual emissions may be determined by multiplying the hourly emission rate by 8760 hr/yr and dividing by 2000 lb/ton.

If required, compliance with the lbs/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.
 - d. Emission Limitation:
0.006 lb of SO2/hr, 0.026 ton/yr of SO2

Applicable Compliance Method:
The hourly emissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 sulfur dioxide emission factor for natural gas (0.6 lb of sulfur dioxide/mmcf) from Section 1.4, Table 1.4-2, 7/98.

The annual emissions may be determined by multiplying the hourly emission rate by 8760 hr/yr and dividing by 2000 lb/ton.

If required, compliance with the lbs/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A.

- e. Emission Limitation:
0.022 lb of CO/hr, 0.1 ton/yr of CO

Applicable Compliance Method:
The hourly emissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 carbon monoxide emission factor for natural gas (84 lbs of carbon monoxide/mmcf) from Section 1.4, Table 1.4-1, 7/98.

The annual emissions may be determined by multiplying the hourly emission rate by 8760 hr/yr and dividing by 2000 lb/ton.

If required, compliance with the lbs/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1 - 4 and 10 of 40 CFR, Part 60, Appendix A.

- f. Emission Limitation:
0.039 lb of VOC/hr, 0.17 ton/yr of VOC

Applicable Compliance Method:
The hourly emissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mmcf/hr) by the AP-42 volatile organic compound emission factor for natural gas (5.5 lbs of volatile organic compounds/mmcf) from Section 1.4, Table 1.4-2, 7/98.

The annual emissions may be determined by multiplying the hourly emission rate by 8760 hr/yr and dividing by 2000 lb/ton.

If required, compliance with the lbs/hr emission limitation shall be demonstrated by stack testing conducted in accordance with Methods 1 - 4 and 25 or 25A of 40 CFR, Part 60, Appendix A.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

- 1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431070580 Issuance type: Title V Proposed Permit

[Go to the top of this document](#)

Facility ID: 1431070580 Emissions Unit ID: F017 Issuance type: Title V Proposed 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. **Additional Terms and Conditions**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None