



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
TUSCARAWAS COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.
Center

Application No: 06-07656

Fac ID: 0679030152

DATE: 11/30/2004

IMCO Recycling of Ohio Inc
Mark Mantooth
7335 Newport Road SE
Uhrichsville, OH 44683

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$750** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

SEDO

WV

PA

TUSCARAWAS COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 06-07656 FOR AN AIR CONTAMINANT SOURCE FOR
IMCO Recycling of Ohio Inc**

On 11/30/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **IMCO Recycling of Ohio Inc**, located at **7335 Newport Road SE, Uhrichsville, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-07656:

No 1 Rotary Furnace.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Kay Gilmer, Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138 [(740)385-8501]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 06-07656

Application Number: 06-07656
Facility ID: 0679030152
Permit Fee: **To be entered upon final issuance**
Name of Facility: IMCO Recycling of Ohio Inc
Person to Contact: Mark Mantooth
Address: 7335 Newport Road SE
Uhrichsville, OH 44683

Location of proposed air contaminant source(s) [emissions unit(s)]:
**7335 Newport Road SE
Uhrichsville, Ohio**

Description of proposed emissions unit(s):
No 1 Rotary Furnace.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

IMCO Recycling of Ohio Inc

Facility ID: 0679030152

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Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

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A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

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shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

IMCO Recycling of Ohio Inc

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

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

IMCO Recycling of Ohio Inc**Facility ID: 0679030152****PTI Application: 06-07656****Issued: To be entered upon final issuance****5. Construction of New Sources(s)**

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

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

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

9. Additional Reporting Requirements When There Are No Deviations of Federally

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Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	6.57
NOx	6.44
HCl	6.57
CO	5.43

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None.

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

None.

IMCC

PTI A

Emissions Unit ID: P901

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property,
and/or Equipment

Applicable Rules/Requirements

P901 - Rotary furnace #1 - existing Group 1 furnace vented to a fabric filter with lime injection	OAC rule 3745-31-05(A)(3)
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OAC rule 3745-18-06(E)(2)

OAC rule 3745-17-07

OAC rule 3745-17-11

40 CFR 63.1505(i)
(Subpart RRR)

**IMCC
PTI A**

Emissions Unit ID: P901

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OAC rule 3745-21-08(B)	Applicable Emissions	10 percent of the uncontrolled HCl
	<u>Limitations/Control Measures</u>	emissions, by weight.
OAC rule 3745-23-06(B)		
	Particulate emissions (stack only) shall not exceed 6.57 tpy.	See section A.I.2.a.
	Emissions of hydrogen chloride (HCl) shall not exceed 6.57 tpy.	Emissions of sulfur dioxide (SO ₂) shall not exceed 72.7 lbs/hr.
	Emissions of nitrogen oxides (NO _x) shall not exceed 1.47 lbs/hr and 6.44 tpy.	See section A.I.2.b.
	Emissions of carbon monoxide (CO) shall not exceed 1.25 lbs/hr and 5.43 tpy.	The requirements of this rule are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	Visible particulate emissions shall not exceed 10% opacity from any add-on air pollution control device for the control of particulates.	The requirements of this rule are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-06(E)(2), 3745-21-08(B), 3745-23-06(B), and 40 CFR Part 63, Subpart RRR.	See section A.I.2.c.
	The permittee shall not discharge emissions in excess of:	
	PM: 0.40 lb per ton of feed/charge;	
	Dioxins and furans toxicity equivalent (D/F TEQ): 2.1 x 10 ⁻⁴ grain per ton of feed/charge; and	
	HCl: 0.40 lb per ton of feed/charge or, if the furnace is equipped with an add-on air pollution control device,	

Emissions Unit ID: P901

2. Additional Terms and Conditions

- 2.a** Pursuant to 40 CFR 63.6(b)(2), this emissions unit is part of a major source, beginning operation after the effective date of 40 CFR 63.1500 - 63.1520 and, as such, is required to comply with those requirements upon startup (per 40 CFR 63.1501(b)).

Therefore, all terms and conditions for this emissions unit which are derived from 40 CFR 63.1500 - 63.1520 (these are designated by the rule citation at the beginning of the term and condition) become effective upon startup.

- 2.b** The actual SO₂ emissions are the result of the combustion of natural gas, and are negligible; therefore, no monitoring, record keeping, or reporting are required.
- 2.c** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively, by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install 06-06410.

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1. [40 CFR 63.1506(b)]

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

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

For each affected source or emission unit equipped with an add-on air pollution control device, the owner or operator must:

 - a. Design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of "Industrial Ventilation: A Handbook of Recommended Practice" (incorporated by reference in 40 CFR 63.1502 of this subpart);
 - b. Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter; and
 - c. Operate each capture/collection system according to the procedures and requirements in the OM&M plan.
3. [40 CFR 63.1506(d)]

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

 - a. Except as provided in paragraph (c) of this section, install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test; and

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- b. Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
 - c. The owner or operator may chose to measure and record aluminum production weight from an affected source or emission unit rather than feed/charge weight to an affected source or emission unit, provided that:
 - i. The aluminum production weight, rather than feed/charge weight is measured and recorded for all emission units within a SAPU; and
 - ii. All calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.
4. [40 CFR 63.1506(m)]
The owner or operator of a group 1 furnace with emissions controlled by a lime-injected fabric filter must:
- a. If a bag leak detection system is used to meet the monitoring requirements in 40 CFR 63.1510, the owner or operator must:
 - i. Initiate corrective action within 1 hour of a bag leak detection system alarm.
 - ii. Complete the corrective action procedures in accordance with the OM&M plan.
 - iii. Operate each fabric filter system such that the bag leak detection system alarm does not sound more than 5 percent of the operating time during a 6-month block reporting period. In calculating this operating time fraction, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted. If corrective action is required, each alarm shall be counted as a minimum of 1 hour. If the owner or operator takes longer than 1 hour to initiate corrective action, the alarm time shall be counted as the actual amount of time taken by the owner or operator to initiate corrective action.
 - b. Maintain the 3-hour block average inlet temperature for each fabric filter at or below the average temperature established during the performance test, plus 14 degrees C (plus 25 degrees F).
 - c. For a continuous lime injection system, maintain free-flowing lime in the hopper to the feed device at all times and maintain the lime feeder setting at the same level established during the performance test.

Emissions Unit ID: P901

- d. Maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test.
 - e. Operate each sidewell furnace such that:
 - i. The level of molten metal remains above the top of the passage between the sidewell and hearth during reactive flux injection, unless the hearth also is equipped with an add-on control device.
 - ii. Reactive flux is added only in the sidewell unless the hearth also is equipped with an add-on control device.
5. [40 CFR 63.1506(p)]
When a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the performance test and incorporated in the OM&M plan, the owner or operator must initiate corrective action. Corrective action must restore operation of the affected source or emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.

III. Monitoring and/or Recordkeeping Requirements

1. [40 CFR 63.1510(a)]
On and after the date the initial performance test is completed or required to be completed, whichever date is earlier, the owner or operator of a new or existing affected source or emission unit must monitor all control equipment and processes according to the requirements in this section.
2. [40 CFR 63.1510(b)]
The owner or operator must prepare and implement for each new or existing affected source and emission unit, a written operation, maintenance, and monitoring (OM&M) plan. Any subsequent changes to the plan must be submitted to the Ohio EPA, Southeast District Office for review and approval. Pending approval by the Ohio EPA, Southeast District Office of an initial or amended plan, the owner or operator must comply with the provisions of the submitted plan. Each plan must contain the following information:
 - a. Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
 - b. A monitoring schedule for each affected source and emissions unit.

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- c. Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR 63.1505.
 - d. Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
 - i. calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and
 - ii. procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in Subpart A of 40 CFR Part 63.
 - e. Procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
 - f. Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in this section, including:
 - i. procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and
 - ii. procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
 - g. A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
 - h. Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in 40 CFR 63.1510(o) for each group 1 furnace not equipped with an add-on air pollution control device.
3. [40 CFR 63.1510(c)]
The owner or operator must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.

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4. [40 CFR 63.1510(d)]
The owner or operator must:
 - a. Install, operate, and maintain a capture/collection system for each affected source and emission unit equipped with an add-on air pollution control device; and
 - b. Inspect each capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements in 40 CFR 63.1506(c) and record the results of each inspection.

5. [40 CFR 63.1510(e)]
The owner or operator of an affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) or g/Mg (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emission unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emission unit-by-emission unit basis. As an alternative to a measurement device, the owner or operator may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emission unit.
 - a. The accuracy of the weight measurement device or procedure must be plus or minus 1 percent of the weight being measured. The owner or operator may apply to the permitting agency for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standard.
 - b. The owner or operator must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.

6. [40 CFR 63.1510(f)]
These requirements apply to the owner or operator of a new or existing affected source or existing emission unit using a bag leak detection system.
 - a. The owner or operator must install and operate a bag leak detection system for each exhaust stack of a fabric filter.
 - b. Each triboelectric bag leak detection system must be installed, calibrated, operated, and maintained according to the "Fabric Filter Bag Leak Detection Guidance," (September 1997). This document is available from the U.S. Environmental Protection Agency; Office of Air Quality Planning and Standards; Emissions, Monitoring and Analysis Division; Emission Measurement Center (MD-19), Research Triangle Park, NC 27711. This document also is available on the Technology Transfer Network (TTN) under Emission Measurement Technical Information (EMTIC), Continuous Emission Monitoring. Other

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bag leak detection systems must be installed, operated, calibrated, and maintained in a manner consistent with the manufacturer's written specifications and recommendations.

- c. The bag leak detection system must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 10 milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.
 - d. The bag leak detection system sensor must provide output of relative or absolute PM loadings.
 - e. The bag leak detection system must be equipped with a device to continuously record the output signal from the sensor.
 - f. The bag leak detection system must be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm must be located where it is easily heard by plant operating personnel.
 - g. For positive pressure fabric filter systems, a bag leak detection system must be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector must be installed downstream of the fabric filter.
 - h. Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.
 - i. The baseline output must be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time.
 - j. Following initial adjustment of the system, the owner or operator must not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the OM&M plan. In no case may the sensitivity be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition.
7. [40 CFR 63.1510(h)]
- a. The owner or operator must install, calibrate, maintain, and operate a device to continuously monitor and record the temperature of the fabric filter inlet gases consistent with the requirements for continuous monitoring systems in Subpart A of 40 CFR Part 63.
 - b. The temperature monitoring device must meet each of these performance and equipment specifications:
 - i. The monitoring system must record the temperature in 15-minute block averages and calculate and record the average temperature for each 3-hour block period.
 - ii. The recorder response range must include zero and 1.5 times the average

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temperature established according to the requirements in 40 CFR 63.1512(n).

- iii. The reference method must be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference, subject to approval by the Administrator.

8. [40 CFR 63.1510(i)(1) and (2)]

- a. The owner or operator of a continuous lime injection system must verify that lime is always free-flowing by either:
 - i. Inspecting each feed hopper or silo at least once each 8-hour period and recording the results of each inspection. If lime is found not to be free-flowing during any of the 8-hour periods, the owner or operator must increase the frequency of inspections to at least once every 4-hour period for the next 3 days. The owner or operator may return to inspections at least once every 8 hour period if corrective action results in no further blockages of lime during the 3-day period; or
 - ii. Subject to the approval of the permitting agency, installing, operating and maintaining a load cell, carrier gas/lime flow indicator, carrier gas pressure drop measurement system or other system to confirm that lime is free-flowing. If lime is found not to be free-flowing, the owner or operator must promptly initiate and complete corrective action, or
 - iii. Subject to the approval of the permitting agency, installing, operating and maintaining a device to monitor the concentration of HCl at the outlet of the fabric filter. If an increase in the concentration of HCl indicates that the lime is not free-flowing, the owner or operator must promptly initiate and complete corrective action.
- b. The owner or operator of a continuous lime injection system must record the lime feeder setting once each day of operation.

9. [40 CFR 63.1510(j)]

The owner or operator must:

- a. Install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emissions unit.
 - i. The monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.

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- ii. The accuracy of the weight measurement device must be plus or minus 1% of the weight of the reactive component of the flux being measured. The owner or operator may apply to the permitting authority for permission to use a weight measurement device of alternative accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of plus or minus 1% impracticable. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standards.
 - iii. The owner or operator must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.
 - b. Calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
 - c. Record, for each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of:
 - i. gaseous or liquid reactive flux other than chlorine; and
 - ii. solid reactive flux.
 - d. Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
 - e. The owner or operator of a group 1 furnace or in-line fluxer performing reactive fluxing may apply to the Administrator for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis.
10. [40 CFR 63.1510(s)]
- a. An owner or operator of a secondary aluminum processing unit at a facility must include, within the OM&M plan prepared in accordance with 40 CFR 63.1510(b), the following information:
 - i. the identification of each emissions unit in the secondary aluminum processing unit;
 - ii. the specific control technology or pollution prevention measure to be used for each emissions unit in the secondary aluminum processing unit and the date of its

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- installation or application;
 - iii. the emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;
 - iv. information and data demonstrating compliance for each emissions unit with all applicable design, equipment, work practice or operational standards of this subpart; and
 - v. the monitoring requirements applicable to each emissions unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average (3-day, 24-hour rolling average means daily calculations of the average 24-hour emission rate over the 3 most recent consecutive 24-hour periods) using the procedure in 40 CFR 63.1510(t).
- b. The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:
- i. any averaging among emissions of differing pollutants;
 - ii. the inclusion of any affected sources other than emissions units in a secondary aluminum processing unit;
 - iii. the inclusion of any emissions unit while it is shut down; or
 - iv. the inclusion of any periods of startup, shutdown, or malfunction in emission calculations.
- c. To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the permittee must submit a request to the Ohio EPA, Southeast District Office containing the information required by paragraph (a) of this section and obtain approval of the Ohio EPA, Southeast District Office prior to implementing any revisions.

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11. [40 CFR 63.1510(t)]

Except as provided in section A.III.12, the owner or operator must calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for each secondary aluminum processing unit on a daily basis. To calculate the 3-day, 24-hour rolling average, the owner or operator must:

 - a. Calculate and record the total weight of material charged to each emissions unit in the secondary aluminum processing unit for each 24-hour day of operation using the feed/charge weight information required in 40 CFR 63.1510(e). If the permittee chooses to comply on the basis of weight of aluminum produced by the emissions unit, rather than weight of material charged to the emissions unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.
 - b. Multiply the total feed/charge weight to the emissions unit, or the weight of aluminum produced by the emissions unit, for each emissions unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emissions unit (as determined during the performance test) to provide emissions for each emissions unit for the 24-hour period, in pounds.
 - c. Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.
 - d. Compute the 24-hour daily emission rate using the equation in 40 CFR 63.1510(t)(4).
 - e. Calculate and record the 3-day, 24-hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the 3 most recent consecutive days and dividing by 3.
12. [40 CFR 63.1510(u)]

As an alternative to the procedures of section A.III.11, the owner or operator may demonstrate, through performance tests, that each individual emissions unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emissions unit.
13. [40 CFR 63.1517(a)]

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

 - a. The owner or operator must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.
 - b. The owner or operator may retain records on microfilm, computer disks, magnetic tape, or microfiche; and

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- c. The owner or operator may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.
14. [40 CFR 63.1517(b)]
In addition to the general records required by 40 CFR 63.10(b), the owner or operator of a new or existing affected source (including an emission unit in a secondary aluminum processing unit) must maintain records of:
- a. For each affected source and emission unit with emissions controlled by a fabric filter or a lime-injected fabric filter using a bag leak detection system: the number of total operating hours for the affected source or emission unit during each 6-month reporting period, records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken.
 - b. For each affected source and emission unit with emissions controlled by a lime-injected fabric filter:
 - i. Records of inspections at least once every 8-hour period verifying that lime is present in the feeder hopper or silo and flowing, including any inspection where blockage is found, with a brief explanation of the cause of the blockage and the corrective action taken, and records of inspections at least once every 4-hour period for the subsequent 3 days. If flow monitors, pressure drop sensors or load cells are used to verify that lime is present in the hopper and flowing, records of all monitor or sensor output including any event where blockage was found, with a brief explanation of the cause of the blockage and the corrective action taken;
 - ii. If lime feeder setting is monitored, records of daily inspections of feeder setting, including records of any deviation of the feeder setting from the setting used in the performance test, with a brief explanation of the cause of the deviation and the corrective action taken.
 - iii. If lime addition rate for a noncontinuous lime injection system is monitored pursuant to the approved alternative monitoring requirements in 40 CFR 63.1510(v), records of the time and mass of each lime addition during each operating cycle or time period used in the performance test and calculations of the average lime addition rate (lb/ton of feed/charge).
 - c. For each group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer, records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the

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identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.

- d. For each affected source and emission unit subject to an emission standard in kg/Mg (lb/ton) of feed/charge, records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.
- e. Records of monthly inspections for proper unit labeling for each affected source and emission unit subject to labeling requirements.
- f. Records of annual inspections of emission capture/collection and closed vent systems.
- g. Records for any approved alternative monitoring or test procedure.
- h. Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:
 - i. Startup, shutdown, and malfunction plan;
 - ii. For major sources, OM&M plan; and
 - iii. Site-specific secondary aluminum processing unit emission plan (if applicable).
- i. For each secondary aluminum processing unit, records of total charge weight, or if the owner or operator chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.

IV. Reporting Requirements

1. [40 CFR 63.1515(a)]
 The owner or operator must submit initial notifications to the applicable permitting authority as follows:
 - a. As required by 40 CFR 63.9(b)(1), the owner or operator must provide notification for an area source that subsequently increases its emissions such that the source is a major source subject to the standard.
 - b. As required by 40 CFR 63.9(e) and (f), the owner or operator must provide notification of the anticipated date for conducting performance tests. The owner or operator must notify the Administrator of the intent to conduct a performance test at least 60 days before the performance test is scheduled; notification of opacity or visible emission observations for a performance test must be provided at least 30 days before the observations are scheduled to take place.

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2. [40 CFR 63.1515(b)]

Each owner or operator must submit a notification of compliance status report within 60 days after the compliance dates specified in 40 CFR 63.1501. The notification must be signed by the responsible official who must certify its accuracy. A complete notification of compliance status report must include the information specified in paragraphs (a)(i) through (x) of this section. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. In a State with an approved operating permit program where delegation of authority under section 112(l) of the CAA has not been requested or approved, the owner or operator must provide duplicate notification to the applicable Regional Administrator. If an owner or operator submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report must include:

- a. All information required in 40 CFR 63.9(h). The owner or operator must provide a complete performance test report for each affected source and emission unit for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).
- b. The approved site-specific test plan and performance evaluation test results for each continuous monitoring system (including a continuous emission or opacity monitoring system).
- c. Unit labeling as described in 40 CFR 63.1506(b), including process type or furnace classification and operating requirements.
- d. The compliant operating parameter value or range established for each affected source or emission unit with supporting documentation and a description of the procedure used to establish the value (e.g., lime injection rate, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature), including the operating cycle or time period used in the performance test.
- e. Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for capture/collection systems in 40 CFR 63.1506(c).
- f. If applicable, analysis and supporting documentation demonstrating conformance with EPA guidance and specifications for bag leak detection systems in 40 CFR 63.1510(f).
- g. Manufacturer's specification or analysis documenting the design residence time of no less than 1 second for each afterburner used to control emissions from a scrap dryer/delacquering kiln/decoating kiln subject to alternative emission standards in 40 CFR 63.1505(e).
- h. Manufacturer's specification or analysis documenting the design residence time of no less than 2 seconds and design operating temperature of no less than 1600 F for each afterburner used to control emissions from a sweat furnace that is not subject to a

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- iv. An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).
 - v. An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).
 - vi. An affected source was not operated according to the requirements of this subpart.
- b. The owner or operator must submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.
5. [40 CFR 63.1516(c)]
For the purpose of annual certifications of compliance required by 40 CFR part 70 or 71, the owner or operator must certify continuing compliance based upon, but not limited to, the following conditions:
- a. Any period of excess emissions, as defined in paragraph 40 CFR 63.1516(b)(1) (see section A.IV.4.a), that occurred during the year were reported as required by this subpart; and
 - b. All monitoring, record keeping, and reporting requirements were met during the year.

V. Testing Requirements

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

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

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

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calculated using Equation 3 in 40 CFR 63.1505(k).

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

2. [40 CFR 63.1511(a)]
Prior to conducting a performance test required by this section, the owner or operator must prepare and submit a site-specific test plan meeting the requirements in 40 CFR 63.7(c).
3. [40 CFR 63.1511(b)]
Following approval of the site-specific test plan, the owner or operator must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected source and emissions unit, and report the results in the notification of compliance status report as described in 40 CFR 63.1515(b). The owner or operator must conduct each performance test according to the requirements of the general provisions in Subpart A of 40 CFR Part 63 and this permit.
 - a. The owner or operator must conduct each test while the affected source or emissions unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.
 - b. Each performance test for a continuous process must consist of 3 separate runs; pollutant sampling for each run must be conducted for the time period specified in the applicable method or, in the absence of a specific time period in the test method, for a minimum of 3 hours.
 - c. Each performance test for a batch process must consist of three separate runs; pollutant sampling for each run must be conducted over the entire process operating cycle.
 - d. Where multiple affected sources or emissions units are exhausted through a common stack, pollutant sampling for each run must be conducted over a period of time during which all affected sources or emissions units complete at least 1 entire process operating cycle or for 24 hours, whichever is shorter.
 - e. Initial compliance with an applicable emission limit or standard is demonstrated if the average of three runs conducted during the performance test is less than or equal to the applicable emission limit or standard.

4. [40 CFR 63.1511(c)]

The owner or operator must use the following methods in Appendix A to 40 CFR Part 60 to determine compliance with the applicable emission limits or standards:

 - a. Method 1 for sample and velocity traverses.
 - b. Method 2 for velocity and volumetric flow rate.
 - c. Method 3 for gas analysis.
 - d. Method 4 for moisture content of the stack gas.
 - e. Method 5 for the concentration of PM.
 - f. Method 9 for visible emission observations.
 - g. Method 23 for the concentration of D/F.
 - h. Method 25A for the concentration of THC, as propane.
 - i. Method 26A for the concentration of HCl. Where a lime-injected fabric filter is used as the control device to comply with the 90 percent reduction standard, the permittee must measure the fabric filter inlet concentration of HCl at a point before lime is introduced to the system.

5. [40 CFR 63.1511(d)]

The owner or operator may use an alternative test method, subject to approval by the Administrator.

6. [40 CFR 63.1511(e)]

The owner or operator of new or existing affected sources and emissions units located at secondary aluminum production facilities that are major sources must conduct a performance test every 5 years following the initial performance test.

7. [40 CFR 63.1511(g)]

The owner or operator of new or existing affected sources and emission units must establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR 63.1510 that ensures compliance with the applicable emission limit or standard. To establish the minimum or maximum value or range, the owner or operator must use the appropriate procedures in this section and submit the information required by 40 CFR 63.1515(b)(4) in the notification of compliance status report. The owner or operator may use existing data in addition to the results of performance tests to establish operating parameter values for compliance monitoring provided each of the following conditions are met to the satisfaction of the applicable permitting authority:

 - a. The complete emission test report(s) used as the basis of the parameter(s) is submitted.
 - b. The same test methods and procedures as required by this subpart were used in the test.
 - c. The owner or operator certifies that no design or work practice changes have been made to the source, process, or emission control equipment since the time of the report.
 - d. All process and control equipment operating parameters required to be monitored were

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monitored as required in this subpart and documented in the test report.

8. [40 CFR 63.1512(d)]
 - a. The owner or operator of a group 1 furnace that processes scrap other than clean charge materials with emissions controlled by a lime-injected fabric filter must conduct performance tests to measure emissions of PM and D/F at the outlet of the control device and emissions of HCl at the outlet (for the emission limit) or the inlet and the outlet (for the percent reduction standard).
 - b. The owner or operator may choose to determine the rate of reactive flux addition to the group 1 furnace and assume, for the purposes of demonstrating compliance with the SAPU emission limit, that all reactive flux added to the group 1 furnace is emitted. Under these circumstances, the owner or operator is not required to conduct an emission test for HCl.
9. [40 CFR 63.1512(j)]

The owner or operator must conduct performance tests as described below. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl and g TEQ/Mg of feed/charge for D/F emissions from each emission unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in 40 CFR 63.1510(t). A performance test is required for:

 - a. Each group 1 furnace that processes scrap other than clean charge to measure emissions of PM and D/F and either:
 - i. emissions of HCl (for the emission limit); or
 - ii. the mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).
10. [40 CFR 63.1512(k)]

During the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the owner or operator of an affected source or emission unit, subject to an emission limit in a kg/Mg (lb/ton) of feed/charge format, must measure (or otherwise determine) and record the total weight of feed/charge to the affected source or emission unit for each of the three test runs and calculate and record the total weight. An owner or operator that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emission unit or affected source instead of the feed/charge weight.
11. [40 CFR 63.1512(n)]

The owner or operator of a scrap dryer/delacquering kiln/decoating kiln or a group 1 furnace using a lime-injected fabric filter must use these procedures to establish an operating parameter value or range for the inlet gas temperature.

 - a. Continuously measure and record the temperature at the inlet to the lime-injected fabric filter every 15 minutes during the HCl and D/F performance tests;

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- b. Determine and record the 15-minute block average temperatures for the 3 test runs; and
 - c. Determine and record the 3-hour block average of the recorded temperature measurements for the 3 test runs.
12. [40 CFR 63.1512(o)]
The owner or operator must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.
- a. Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15 minute period during the HCl and D/F tests, determine and record the 15-minute block average weights, and calculate and record the total weight of the gaseous or liquid reactive flux for the 3 test runs;
 - b. Record the identity, composition, and total weight of each addition of solid reactive flux for the 3 test runs;
 - c. Determine the total reactive chlorine flux injection rate by adding the recorded measurement of the total weight of chlorine in the gaseous or liquid reactive flux injected and the total weight of chlorine in the solid reactive flux using Equation 5 of 40 CFR 63.1512(o);
 - d. Divide the weight of total chlorine usage (Wt) for the 3 test runs by the recorded measurement of the total weight of feed for the 3 test runs; and
 - e. If a solid reactive flux other than magnesium chloride is used, the owner or operator must derive the appropriate proportion factor subject to approval by the applicable permitting authority.
13. [40 CFR 63.1512(p)]
The owner or operator of an affected source or emission unit using a lime-injected fabric filter system must use these procedures during the HCl and D/F tests to establish an operating parameter value for the feeder setting for each operating cycle or time period used in the performance test.
- a. For continuous lime injection systems, ensure that lime in the feed hopper or silo is free-flowing at all times; and
 - b. Record the feeder setting for the 3 test runs. If the feed rate setting varies during the runs, determine and record the average feed rate from the 3 runs.

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

- a. Emission Limitation: PE shall not exceed 6.57 tpy. Emissions of HCl shall not exceed 6.57 tpy.

Applicable Compliance Method: This allowable limit was determined by multiplying the allowable emission rate, in lb per ton, by the maximum process weight rate and by 8760 hours per year, then dividing by 2000 lbs per ton. Therefore, compliance with the lb per ton limit will result in compliance with the tpy limit.

$$(0.40 \text{ lb/ton})(3.75 \text{ ton/hr})(8760 \text{ hrs/yr})/(2000 \text{ lbs/ton}) = 6.57 \text{ tpy}$$

- b. Emission Limitation: Emissions of NO_x shall not exceed 1.47 lbs/hr and 6.44 tpy.

Applicable Compliance Method: Compliance shall be determined by multiplying the emission factor for natural gas combustion, from AP-42 Table 1.4-1 (7/98), in lb per MMBtu, by the maximum Btu rating of the burner to obtain the hourly emission rate. The annual allowable was developed by multiplying the maximum hourly allowable particulate emission rate (1.47 lbs/hr) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

- c. Emission Limitation: Emissions of CO shall not exceed 1.25 lbs/hr and 5.43 tpy.

Applicable Compliance Method: Compliance shall be determined by multiplying the emission factor for natural gas combustion, from AP-42 Table 1.4-1 (7/98), in lb per MMBtu, by the maximum Btu rating of the burner to obtain the hourly emission rate. The annual allowable was developed by multiplying the maximum hourly allowable particulate emission rate (1.25 lbs/hr) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

- d. Emission Limitation: Visible particulate emissions shall not exceed 10 percent opacity from any add-on air pollution control device for the control of particulates.

Applicable Compliance Method: If required, compliance with these emission limits shall be demonstrated in accordance with 40 CFR 60 Appendix A, Method 9.

- e. Emission Limitations:

0.40 pound of particulate emissions per ton of feed/charge

2.1 x 10⁻⁴ gr of D/F TEQ per ton of feed/charge

0.40 pound of HCl per ton of feed/charge

IMCC

PTI A

Emissions Unit ID: P901

Issued: To be entered upon final issuance

Applicable Compliance Method: Compliance shall be demonstrated based upon the testing requirements specified in section A.V.

- f. Emission Limitation: Emissions of SO₂ shall not exceed 72.7 lbs/hr.

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

VI. Miscellaneous Requirements

None.

IMCC

PTI A

Emissions Unit ID: P901

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P901 - Rotary furnace #1 - existing Group 1 furnace vented to a fabric filter with lime injection	None	None

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.