



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

**RE: DRAFT PERMIT TO INSTALL
CARROLL COUNTY
Application No: 02-18914**

CERTIFIED MAIL

DATE: 2/26/2004

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

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

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 **\$4500** 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.

Very truly yours,

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

cc: USEPA

NEDO

WV

PA

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 02-18914 FOR AN AIR CONTAMINANT SOURCE FOR
M AND M DRYING, LTD**

On 2/26/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **M and M Drying, LTD**, located at **217 Roosevelt Ave, Minerva, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-18914:

Modification of rotary aluminum smelting 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.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087 [(330)425-9171]



Permit To Install

Issue Date: To be entered upon final issuance

Terms and Conditions

Effective Date: To be entered upon final issuance

DRAFT PERMIT TO INSTALL 02-18914

Application Number: 02-18914

APS Premise Number: 0210000107

Permit Fee: **To be entered upon final issuance**

Name of Facility: M and M Drying, LTD

Person to Contact: Percy Kanga

Address: 217 Roosevelt Ave
Minerva, OH 44657

Location of proposed air contaminant source(s) [emissions unit(s)]:

**217 Roosevelt Ave
Minerva, Ohio**

Description of proposed emissions unit(s):

Modification of rotary aluminum smelting 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

Part I - GENERAL TERMS AND CONDITIONS

A. 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 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 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. 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.

9. 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.

10. 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.

11. Applicability

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

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be 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).

M and M Drying, LTD**PTI Application: 02-18914****Issued: To be entered upon final issuance****Facility ID: 0210000107**

- 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.

14. Construction Compliance Certification

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

15. 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.

B. 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>
Particulate/PM 10	13.58
HCl	1.14
Dioxin and Furans	4.13 E-07
NOx	2.90
CO	4.86

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
P006 - Furnace no. 8 for secondary aluminum processing, two 7.0 MM Btu burners which are fired with either natural gas or oxyfuel, with 68,200 cfm lime injected baghouse	OAC rule 3745-31-05 (A)(3)	<p>Products of Combustion: NOx - 0.66 lb/hour and 2.90 TPY CO - 1.11 lbs/hour and 4.86 TPY PE - 0.10 lb/hour and 0.44 TPY</p> <p>Process Emissions: Visible particulate emissions shall not exceed 10% opacity as a 6-minute average</p> <p>Particulate emissions shall not exceed 3.0 lbs per hour and 13.14 tons per year.</p> <p>HCl emissions shall not exceed 0.26 lb per hour and 1.14 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR 63, Subpart RRR.</p>
	40 CFR 63, Subpart RRR 63.1505(i)(3)	Dioxins and furans (D/F) emissions shall not exceed 2.1 E-04 grain of D/F TEQ per ton of feed or charge to the furnace, and 4.13 E-07 ton per year. See Section A.I.2.a and A.I.2.b. below.
	OAC rule 3745-17-07 (A)	The requirements of this rule are less stringent than the visible particulate emission limit established pursuant to OAC rule 3745-31-05 9(A)(3).

OAC rule 3745-17-11 (A)(2)

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

OAC rule 3745-17-10 (B)(1)

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

2. Additional Terms and Conditions

2.a In accordance with the definitions listed in Subpart RRR, M & M Drying, LTD is a secondary aluminum production facility that is an area source of HAPs. This emissions unit is a group 1 furnace that does not employ reactive fluxing within a secondary aluminum processing unit, per said definitions. Therefore, only the dioxins and furans emissions limitations, operation, monitoring, reporting and record keeping requirements apply.

2.b Section 63.1503 of Subpart RRR defines TEQ as the international method of expressing toxicity equivalents for dioxins and furans as defined in "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update "(EPA-625/3-89-016).

B. Operational Restrictions

1. The permittee shall burn only natural gas or oxyfuel in this emissions unit.
2. The permittee shall maintain the 3-hour block average inlet temperature for the fabric filter at or below the average temperature established during the performance test, plus 14 degrees C (plus 25 degrees F).
3. The permittee shall lime coat the fabric filter prior to the initial operation of this emissions unit. Lime shall be added to the fabric filter intermittently, thereafter. The schedule and rate of lime addition shall be proposed by the permittee, for approval by the Ohio EPA Northeast District Office, following the initial performance test. At a minimum, lime shall be added following each complete shakeout cycle of the fabric filter.
4. The pressure drop across the baghouse shall be maintained within the range of 2- 7 inches of water while the emissions unit is in operation.

C. Monitoring and/or Record keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas or oxyfuel, the permittee shall maintain a record of the type and quantity of fuel burned.
2. The permittee shall properly install, operate, and maintain equipment to monitor and record the 3-hour block average inlet temperature for 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). Further monitoring device specifications are listed in Section 63.1510 of Subpart RRR.
3. The permittee shall maintain daily records of the intermittent addition of lime to the fabric filter. The date, time and rate, in lbs of lime injected, shall be recorded.
4. The permittee shall properly install, 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). The permittee shall record the pressure drop across the baghouse on a weekly basis.
5. The permittee shall maintain daily records of the number of hours of operation for this emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or oxyfuel was burned. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit baghouse inlet temperature deviation (excursion) reports that identify all periods of time during which the 3-hour block average baghouse temperature did not comply with the allowable range specified above.
3. The permittee shall submit deviation (excursion) reports that identify all periods of time for which the schedule and rate of lime addition to the fabric filter was not met and list the corrective action taken to remedy same.
4. The permittee shall submit 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 above.
5. 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.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation -
Visible particulate emissions shall not exceed 10 percent opacity, as a 6-minute average, at any time.
Applicable Compliance Method -
Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR part 60, Appendix A, Method 9 and the procedures specified in OAC Rule 3745-17-03(B)(1).
 - b. Emission Limitation -
0.66 lb NO_x per hour and 2.90 TPY
Applicable Compliance Method-
 $(50 \text{ lbs/MM ft}^3)^{(1)} \times (14 \text{ MM Btu/hour}) \times (1 \text{ scf}/1,059 \text{ BTU}) = 0.66 \text{ lb/hour}$
 $(0.66 \text{ lb/hour}) \times 8760/2000 = 2.90 \text{ TPY}$
Note: No NO_x would be formed during combustion of oxyfuel.

(1) AP- 42, Table 1.4-1 (7/98)
 - c. Emission Limitation-
1.11 lbs/hour CO and 4.86 TPY
Applicable Compliance Method-
 $(84 \text{ lbs/ MM ft}^3)^{(1)} \times (14 \text{ MM Btu/hour}) \times (1 \text{ scf}/1,059 \text{ Btu}) = 1.11 \text{ lbs/hour} \times 8760/2000 = 4.86 \text{ TPY}$
Note: Various on-line literature suggests combustion of oxyfuel may reduce CO formation 40-60 %.

(1) AP- 42, Table 1.4-1 (7/98)
 - d. Emission Limitation-
0.10 lb/hour PE and 0.44 TPY from products of combustion
Applicable Compliance Method-
 $(7.6 \text{ lb/MMB ft}^3)^{(2)} \times (14 \text{ MM Btu/hour}) \times (1 \text{ scf}/1,059 \text{ Btu}) = 0.10 \text{ lb/hour}$
 $(0.10 \text{ lb/hour}) \times 8760/2000 = 0.44 \text{ TPY}$

(2) AP-42, Table 1.4-2 (7/98)
 - e. Emission Limitation-
3.0 lbs/hour and 13.14 tons per year mass emission rate of particulates from process

Applicable Compliance Method -
The permittee shall conduct, or have conducted, particulate emission testing for this

emissions unit to demonstrate compliance with the allowable mass emission rate in accordance with 40 CFR Part 60, Appendix A, Methods 1 -5 within 180 days of start-up of operation.

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

f. Emission Limitation -

0.26 lb/hour and 1.14 tons per year mass emission rate of HCl.

The permittee shall conduct, or have conducted, HCl emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate in accordance with 40 CFR Part 60, Appendix A, Method 26A within 180 days of start-up of operation.

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

g. Emission Limitation -

2.1 E-04 grain of D/F TEQ per ton of feed or charge to the furnace and 4.14 E-07 ton per year. The permittee shall conduct, or have conducted, D/F emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate in accordance with 40 CFR Part 60, Appendix A, Method 23 within 180 days of start-up of operation.

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

2. All of the tests shall be conducted while the emissions unit is operating at or near its maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operation parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

M and M Drying, LTD

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Facility ID: 0210000107

Emissions Unit ID: P006

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

F. Miscellaneous Requirements

1. This permit replaces Permit to Install No. 02- 14,867 for this emissions unit.