

## **Synthetic Minor Determination**

### **RMI Titanium Company - Niles Plant**

#### **Facility No. 02-78-06-0189**

##### A. Source Description

US Can is an existing facility located at 1000 Warren Ave., Niles, Ohio. The plant produces titanium metal, which is supplied to various industries.

##### B. Facility Emissions and Attainment Status

RMI operates under expired state permits as a natural minor with respect to the Title V requirements. The facility is located in Trumbull County which is currently attainment for all criteria pollutants. The non-registration emissions units that RMI operates, are primarily cutting, grinding, and surface treatment operations that finish raw ingots that are brought to the facility.

##### C. Source Emissions

The emissions units at RMI are primarily regulated under OAC rules 3745-17-11 and 3745-31-05. Due to the heavy weight of titanium ingots, the allowable emission rates are rather high on the OAC rule 3745-17-11 regulated emissions units. In an effort to show that they were a minor source with regard to the Title V thresholds, RMI install meters on the motors of all their cutting, grinding, and surface treatment operations. These meters record the actual times that the emissions units are in operation. Using these times and the allowable emission limitations for these units, RMI has shown that actual emissions have been below 20 tons per year of particulate since 1996.

This synthetic minor permit will have annual hourly on all the permitted emissions units. These annual hourly limits will assure that the facilities potential stays well below 100 tons per year of particulate emissions. Over the years RMI has tested a large number of emissions units, to show that they met compliance with their emission standards.

##### D. Conclusion

The federally enforceable state operating permit will limit the emissions from this facility to less than 100 tons per year of particulate emissions. The facility will be required by permit to record and maintain hourly operating data on each emissions unit on a 12-month rolling time frame. The facility will also be required to calculate annual particulate emissions for each emissions unit using this data, and submit an annual summation to the Ohio EPA. This permit will assure that RMI will stay a minor source with respect to the threshold for requiring a TV permit.