



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
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Columbus, OH 43215

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

04/15/99

**CERTIFIED MAIL**

**RE: Preliminary Proposed Title V  
Chapter 3745-77 permit**

13-18-00-1287  
Wabash Alloys  
Farrell Norman  
4365 Bradley Road  
Cleveland, OH 44109

Dear Farrell Norman:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 01/28/99. The comment period has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written or with agreed-upon changes, then you have the opportunity to schedule a meeting with us to discuss your concerns.

Please contact Jim Orlemann, Engineering Section Manager, 614-644-3592, or you can telefax your request to (614) 644-3681, within fourteen (14) days from receipt of this letter if a meeting is desired. If a request for a meeting is not received within fourteen (14) days of receipt of this letter, we will forward this proposed permit (as written, or with agreed-upon changes) to USEPA for approval.

Very truly yours,

A handwritten signature in black ink that reads "Thomas G. Rigo". The signature is written in a cursive style.

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: Cleveland Division of Air Pollution Control  
Becky Castle, DAPC PMU



## Ohio EPA

State of Ohio Environmental Protection Agency

### TITLE V PERMIT

Date: 04/15/99

### PRELIMINARY PROPOSED

Effective Date:

Expiration Date:

This document constitutes issuance to:

Wabash Alloys  
4365 Bradley Road  
Cleveland, OH 44109

of a Title V permit for Facility ID: 13-18-00-1287

Emissions Unit ID (Company ID)/  
Emissions Unit Activity Description:  
P020 (Crusher #2)  
Hammermill Crusher with baghouse.

P024 (Wastewater Evaporator)  
Natural gas fired wastewater evaporator

P903 (Rotary Dryer)  
Natural gas fired aluminum scrap dryer with afterburner and natural gas fired.

P912 (Aluminum Scrap Melting Furnace No.2)  
Natural gas fired aluminum scrap melting furnace No. 2.

P913 (Aluminum Scrap Melting Furnace No.4)  
Natural gas fired aluminum scrap melting furnace No. 4.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Cleveland Division of Air Pollution Control  
1925 St. Clair  
Cleveland, OH 44114  
(216) 664-2324

OHIO ENVIRONMENTAL PROTECTION AGENCY

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Christopher Jones  
Director

# PART I - GENERAL TERMS AND CONDITIONS

## A. State and Federally Enforceable Section

### 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 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 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 promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. 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. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
  - 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. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. 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 submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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**

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.

## **8. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

## **9. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

## **10. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

## **11. 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 shall not be federally enforceable and shall be enforceable under State law only.

## **12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
  - 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.

- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
  - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

### **13. Permit Shield**

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

### **14. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

### **15. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

## **16. Off Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

## **17. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

## **B. State Only Enforceable Section**

### **1. Permit to Install Requirement**

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **2. Reporting Requirements Related to Monitoring and Recordkeeping 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. Additional Reporting Requirements When There Are No Deviations of Federally 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.

## **Part II - Specific Facility Terms and Conditions**

### **A. State and Federally Enforceable Section**

**None**

### **B. State Only Enforceable Section**

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

- F001 Roadways and Parking Areas
- F003 Hot Dross Handling
- P017 Chlorine Vaporizer
- P019 Ladle Temperature Holding Station #1 (Heaters 1 through 4)
- Z000 Welding Operations
- P021 Ladle Temperature Holding Station #2 (Heaters 5 through 8)
- Z002 Ladle Temperature Holding Station #3 (Heaters 9 and 10)
- Z004 Metal Pouring and Casting
- Z005 Scrap Aluminum Unloading
- Z006 Scrap Aluminum Storage/Sorting
- Z007 Cold Cleaner
- Z008 Cold Cleaner
- Z009 Raw Material Quality Testing

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit. Except for emissions unit P021, there are no permit to install emission limitations or control requirements for these insignificant emissions units.

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

**Emissions Unit ID:** Crusher #2 (P020)  
**Activity Description:** Hammermill Crusher with baghouse.

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Aluminum scrap hammermill crusher equipped with 2 vibrating conveyors, 2 belt conveyors, 2 drum magnets and controlled with a 25,000 acfm fabric filter.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 8.13 lbs/hr.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The pressure drop across the fabric filter shall be maintained within the pressure drop range established during the most recent emission test that demonstrated that the emissions unit was in compliance.
- The maximum charging process weight rate shall not exceed the charging process weight rate established during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

- The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the fabric filter while this emissions unit is in operation. The monitoring device shall be capable of accurately measuring the desired parameter. 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 fabric filter at the beginning of each shift on a daily basis when the emissions unit is in operation.

##### IV. Reporting Requirements

- The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range.

## V. Testing Requirements

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

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- 2.a Emission testing shall be conducted to demonstrate compliance with the allowable particulate mass emission limitation of 8.13 lbs/hr.
- 2.b The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.
- 2.c The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- 2.d The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1 through 5 of 40 CFR Part 60, Appendix A. If applicable, alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- 2.e 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 operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA 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.

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.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Aluminum scrap hammermill crusher equipped with 2 vibrating conveyors, 2 belt conveyors, 2 drum magnets and controlled with a 25,000 acfm fabric filter.	OAC rule 3745-31-05 (PTI 13-2897)	<p>Particulate emissions shall not exceed 0.01 grain/acf, 2.14 lbs/hr, and 9.39 tons/yr from the stack serving the fabric filter.</p> <p>Visible particulate emissions from the stack serving the fabric filter shall not exceed 5% opacity, as a 6-minute average.</p> <p>See Sections B.I.2.a and B.I.2.b below.</p>

**2. Additional Terms and Conditions**

- All of the visible particulate emissions from this emissions unit shall be captured at the hood and vented to the fabric filter.

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

- Emission Limitation:  
Visible particulate emissions from any stack shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- Emission Limitations:  
Particulate emissions shall not exceed 0.01 grain/acf, 2.14 lbs/hr, and 9.39 tons/yr from the stack serving the fabric filter.

Applicable Compliance Method:

Compliance with the grain loading and lbs/hr particulate emission limitations shall demonstrated through the emission testing required pursuant to Section A.V.3. Compliance with the annual particulate emission limitation can be assumed if the permittee demonstrates compliance with the lbs/hr emission limitation.

Facility Name: **Wabash Alloys L.L.C.**  
Facility ID: **13-18-00-1287**  
Emissions Unit: **Crusher #2 (P020)**

**VI. Miscellaneous Requirements**

**None**

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

**Emissions Unit ID:** Wastewater Evaporator (P024)  
**Activity Description:** Natural gas fired wastewater evaporator

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
0.95 mmBtu/hr natural gas-fired wastewater/oil Evaporator No. 1.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)(1)	Particulate emissions from the natural gas-fired burner shall not exceed 0.020 lb/mmBtu of actual heat input.
	OAC rule 3745-17-11(B)(1)	Particulate emissions from the evaporation process shall not exceed 1.64 lbs/hr.
	OAC rule 3745-21-07(G)	None, see Section A.I.2.a below.
	OAC rule 3745-23-06(B) (PTI 13-3228)	Nitrogen oxides emissions shall not exceed 0.1 lb/hr and 0.44 ton/yr.
		See Section A.I.2.b below.

##### 2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the emission limitations specified in OAC rule 3745-21-07(G)(2) pursuant to OAC rule 3745-21-07(G)(9)(c).
- 2.b The nitrogen oxides lb/hr emission limitation specified in Section A.I.1 reflects the emissions unit's potential to emit; therefore, there are no additional monitoring, record keeping or reporting requirements associated with this emission limitation.

##### II. Operational Restrictions

None

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

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

### IV. Reporting Requirements

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

### V. Testing Requirements

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

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

2. Emission Limitation:  
Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be determined by multiplying an emission factor of 4.5 lbs/mmcu. ft. by the emissions unit's maximum hourly fuel consumption rate (0.00095 mmcu. ft./hr). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

3. Emission Limitation:  
Particulate emissions shall not exceed 1.64 lbs/hr.

Applicable Compliance Method:

Compliance with this emission limitation can be assumed since the particulate emission rate, at the emissions unit's maximum process weight (511 lbs/hr) is always equal to or less than the allowable emission limitation.

If required, the permittee shall demonstrate compliance with this particulate emission limitation through emission testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

## **V. Testing Requirements (continued)**

4. Emission Limitations:  
Nitrogen oxides emissions shall not exceed 0.1 lb/hr and 0.44 ton/yr.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be determined by multiplying an emission factor of 100 lbs/mmcu. ft. by the emissions unit's maximum hourly fuel consumption rate (0.00095 mmcu. ft./hr). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1 (10/96).

Compliance with the ton/yr emission limitation shall be determined by multiplying the lb/hr value derived above by 8760 and dividing by 2000.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7E.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
0.95 mmBtu/hr natural gas-fired wastewater/oil Evaporator No. 1.	OAC rule 3745-31-05 (PTI 13-3228)	Organic compound emissions shall not exceed 2.2 lbs/hr and 9.6 tons/yr  Visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average.  See Sections B.I.2.a through B.I.2.c below.

**2. Additional Terms and Conditions**

- 2.a The permittee shall employ only natural gas to fire the evaporator burner.
- 2.b The permittee shall not employ photochemically reactive materials in this emissions unit.
- 2.c The organic compound lb/hr emission limitation specified in Section B.I.1 reflects the emissions unit's potential to emit; therefore, there are no additional monitoring, record keeping or reporting requirements associated with this emission limitation.

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

## V. Testing Requirements

1. Emission Limitations:  
Organic compound emissions shall not exceed 2.2 lbs/hr and 9.6 tons/yr.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be determined by summing the emissions from natural gas combustion and evaporation. For the emissions from natural gas combustion, multiply an emission factor of 5.8 lbs/mmcf. ft. by the emissions unit's maximum hourly fuel consumption rate (0.00095 mmcf. ft./hr). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-3 (10/96). For the emissions from evaporation, multiply an emission factor of 0.062 lb/gallon of wastewater processed by the emissions unit's maximum hourly wastewater processing rate (35 gallons/hr). This emission factor was established based upon material balance calculations.

Compliance with the ton/yr emission limitation shall be determined by multiplying the lb/hr value derived above by 8760 and dividing by 2000.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 25.

2. Emission Limitation:  
Visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

## VI. Miscellaneous Requirements

**None**

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

**Emissions Unit ID:** Rotary Dryer (P903)

**Activity Description:** Natural gas fired aluminum scrap dryer with afterburner and natural gas fired.

**A. State and Federally Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Horizontal, natural gas-fired, rotary aluminum scrap dryer equipped with hoods, ducts, an 16 mmBtu/hr afterburner, a 4 mmBtu drum burner and a 93,588 acfm ( at 207 degrees F.) 3-compartment fabric filter to capture and control both process stack and fugitive emissions.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-07(B)(1)	Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	Employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
	OAC rule 3745-17-11(B)	See Section A.I.2.a below. Particulate emissions shall not exceed 19.9 lbs/hr.

## **2. Additional Terms and Conditions**

- 2.a** The permittee shall observe and implement the following operation and maintenance practices in order to minimize or eliminate visible emissions of fugitive dust and comply with the requirements of OAC rule 3745-17-08:
- i. The seals around the dryer shall be maintained in proper working order to ensure that fugitive emissions are sufficiently minimized or eliminated at all points.
  - ii. The material feed rate and drum rotation speed must be properly maintained to minimize or eliminate visible emissions of fugitive dust generated at the charging or the product discharge end.
  - iii. Precautions (maintain necessary stream velocities, clean out deposits of fines if any, etc.) shall be taken to prevent or minimize accumulation of fines and plugging of ducts and scrap pathways, especially when extra fine scrap is being processed.
  - iv. Appropriate unloading and disposal procedures for the dust collected in the fabric filter and for the removal or minimization of any dust that may become accumulated underneath the fabric filter shall be employed.
  - v. The afterburner and fabric filter control system shall be maintained and operated at a volumetric flow rate sufficient to create enough draft to adequately capture the particulate emissions from this emissions unit.

## **II. Operational Restrictions**

1. The pressure drop across the fabric filter shall be maintained within the pressure drop range established during the most recent emission test that demonstrated that the emissions unit was in compliance.
2. The average combustion temperature within the afterburner shall be greater than 1300 degrees Fahrenheit when the emissions unit is drying material.
3. The maximum charging process weight rate shall not exceed the charging process weight rate established during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

1. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the fabric filter while this emissions unit is drying material. The monitoring device shall be capable of accurately measuring the desired parameter. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the afterburner when the emissions unit is drying material. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
3. The permittee shall collect and record the following information for each day:
  - a. All periods of time during which the average combustion temperature within the afterburner, when the emissions unit was drying material, was less than 1300 degrees Fahrenheit.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was drying material.
  - c. The permittee shall record the pressure drop across the fabric filter at the beginning of each shift when the emissions unit is drying material.

### III. Monitoring and/or Record Keeping Requirements (continued)

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

### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:
  - a. All periods of time during which the pressure drop across the fabric filter did not comply with the allowable range established during the most recent emission test that demonstrated that the emissions unit was in compliance.
  - b. All periods of time during which the average combustion temperature within the afterburner, when the emissions unit was drying material, was less than 1300 degrees Fahrenheit.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

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

### V. Testing Requirements

1. Emission Limitation:  
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.  
  
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).
2. Emission Limitation:  
Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.  
  
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 paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.
- 3.a Emission testing shall be conducted to demonstrate compliance with the allowable particulate mass emission limitation of 19.9 lbs/hr.
- 3.b The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.
- 3.c The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

## **V. Testing Requirements (continued)**

- 3.d** The following test methods shall be employed to demonstrate compliance with the allowable particulate mass emission limitation: 40 CFR Part 60, Appendix A, Methods 1 through 5. If applicable, alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- 3.e** 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 operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA 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.

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.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Horizontal, natural gas-fired, rotary aluminum scrap dryer equipped with hoods, ducts, an 16 mmBtu/hr afterburner, a 4 mmBtu drum burner and a 93,588 acfm ( at 207 degrees F.) 3-compartment fabric filter to capture and control both process stack and fugitive emissions.	OAC rule 3745-31-05 (PTI 13-1528)	Particulate emissions shall not exceed 0.01 grain per dscf of exhaust gases from the fabric filter stack.  See Sections B.I.2.a and B.I.2.b below.

**2. Additional Terms and Conditions**

- 2.a The permittee shall maintain a minimum of 10% of the total number of bags in the fabric filter in inventory at all times or shall maintain immediate access to, or availability of, such bags from a supplier.

**II. Operational Restrictions**

1. The permittee shall employ only natural gas to fire the dryer and the afterburner.

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

1. Emission Limitation:  
Particulate emissions shall not exceed 0.01 grain per dscf of exhaust gases from the fabric filter stack.

Applicable Compliance Method:  
Compliance with this emission limitation shall be demonstrated through the emission testing required pursuant to Section A.V.4.

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** Aluminum Scrap Melting Furnace No.2 (P912)  
**Activity Description:** Natural gas fired aluminum scrap melting furnace No. 2.

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
110-ton aluminum holding reverberatory furnace (Furnace No. 2) equipped with a enclosed hood with doors. This hood captures all emissions (as determined by tests) generated by charging, fluxing, skimming, demagging and degassing operations. A blower draws these emissions from the top of the hood and discharges them into a 75,000 acfm (at 200 degrees F.) fabric filter shared by Furnaces Nos. 2 and 4. Furnace No. 2 has two natural gas-fired burners with a maximum total heat input capacity of 24 mmBtu/hr.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-07(B)(1)	Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	Employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.  See Sections A.I.2.a through A.I.2.d below.
Demagging and degassing of the molten aluminum is performed using the demagging system which consists of injecting gaseous chlorine into the molten aluminum stream at the discharge of the pump. The molten aluminum is recirculated in the furnace and demagged until the desired magnesium content is obtained.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 9.12 lbs/hr.

##### 2. Additional Terms and Conditions

- 2.a** The permittee shall ensure that the baffle between the charging well and furnace is properly operated to prevent the entry of excess flux and dross into the furnace combustion chamber in order to minimize the release of visible fugitive particulate emissions.
- 2.b** The two large front doors of the enclosed hood shall be kept closed at all times during the entire melting, fluxing, skimming and other fume-producing operations.
- 2.c** The skim window shall be kept closed as needed to minimize or eliminate fugitive particulate emissions.

## **2. Additional Terms and Conditions (continued)**

- 2.d** This facility shall employ procedures for unloading and disposal of the dust collected in the fabric filter to minimize or eliminate visible emissions of any dust that may become accumulated underneath the fabric filter, including expeditious elimination of the cause of the dust spill and removal of the dust.
- 2.e** This emissions unit and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the applicable and appropriate recommendations of the respective manufacturers in order to minimize air contaminant emissions.

## **II. Operational Restrictions**

- 1.** The maximum charging process weight rate shall not exceed the maximum charging process weight rate established during the most recent emission test that demonstrated that the emissions unit was in compliance. The charging process weight rate is the sum total of aluminum scrap, alloying agents and flux charged to the furnace.
- 2.** The amount of dirty (contaminated with oil, grease, plastic, paint, etc.) aluminum scrap charged to the furnace per heat shall not exceed the percentage of the charging process weight rate established during the most recent emission test that demonstrated that the emissions unit was in compliance.
- 3.** The chlorine injection rate into the pump shall not exceed the injection rate established during the most recent emission test that demonstrated that the emissions unit was in compliance.
- 4.** The hot dross skimmings, skimmed from the charging well, shall be retained in an enclosed area until sufficiently cooled (with unforced ambient air cooling only). The enclosed area shall be evacuated to the fabric filter in order to capture and control the fugitive emissions from the hot dross skimmings.
- 5.** The pressure drop across the fabric filter shall be maintained within the pressure drop range (in inches of water column) established during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

- 1.** The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the fabric filter when the emissions unit is processing material. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s).
- 2.** The permittee shall properly install, operate and maintain equipment to monitor the chlorine injection rate into the pump when 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).
- 3.** The permittee shall collect and record the following information for each day:
  - a. the pressure drop across the fabric filter at the beginning of each shift when the emissions unit is in operation;
  - b. the chlorine injection rate into the pump at the beginning of each shift when the emissions unit is in operation;
  - c. the identification number of each heat;
  - d. the starting and ending times of each heat;
  - e. the date and hours of furnace operation; and
  - f. the net weight and type of scrap and percent dirty scrap in the scrap and materials charged in each heat.

### **III. Monitoring and/or Record Keeping Requirements (continued)**

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the capture points and stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
5. Regular tests, calibrations and maintenance work on the chlorine system shall be recorded in a hard-bound log book.

The permittee shall also maintain written monthly records of the following:

- a. inspections of the chlorine vaporizing system;
- b. inspections of the air packs;
- c. inspections of the B & C emergency repair kits; and
- d. safety meeting minutes concerning the safe handling of chlorine and the operation of the chlorine safety systems at the permittee's facility.

### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify the following:
  - a. all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range when the emissions unit was in operation;
  - b. all periods of time during which the maximum charging process weight rate was exceeded;
  - c. all periods of time during which the percent dirty scrap in the total charging process weight rate was exceeded;
  - d. all periods of time when the hot dross skimmings were not retained in a enclosed area until sufficiently cooled; and
  - e. any exceedances of the chlorine injection rate when the emissions unit was in operation.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the capture points and stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

### **V. 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):

## V. Testing Requirements (continued)

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

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

- 1.b** Emission Limitation:  
Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

- 1.c** Emission Limitation:  
Particulate emissions shall not exceed 9.12 lbs/hr.

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 of 9.12 lbs/hr in accordance with the following requirements:

The particulate emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.

Compliance with the allowable mass emission rate for particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10). If applicable, alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

- 1.d** 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 operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA 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.

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.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<p>110-ton aluminum holding reverberatory furnace (Furnace No. 2) equipped with a enclosed hood with doors. This hood captures all emissions (as determined by tests) generated by charging, fluxing, skimming, demagging and degassing operations. A blower draws these emissions from the top of the hood and discharges them into a 75,000 acfm (at 200 degrees F.) fabric filter shared by Furnaces Nos. 2 and 4. Furnace No. 2 has two natural gas-fired burners with a maximum total heat input capacity of 24 mmBtu/hr.</p> <p>Demagging and degassing of the molten aluminum is performed using the demagging system which consists of injecting gaseous chlorine into the molten aluminum stream at the discharge of the pump. The molten aluminum is recirculated in the furnace and demagged until the desired magnesium content is obtained.</p>	<p>OAC rule 3745-31-05 (PTI 13-2327)</p>	<p>Particulate emissions from the fabric filter stack serving this emissions unit shall not exceed 0.01 gr/dscf.**</p> <p>Particulate emissions from the combustion stack serving this emissions unit shall not exceed 2.99 lbs/hr.</p> <p>There shall be no visible emissions (0% opacity, as a 6-minute average) from the fabric filter and combustion stacks serving this emissions unit.</p> <p>There shall be no visible fugitive particulate emissions from any part of the emissions unit or control equipment.</p>

**2. Additional Terms and Conditions**

- 2.a \*\* The fabric filter controls particulate emissions from emissions units P912 and P913. The 0.01 gr/dscf emission limitation is equivalent to 2.57 lbs/hr when only one furnace is in operation; and 5.15 lbs/hr when both furnaces are operating simultaneously.
- 2.b This facility shall maintain an adequate supply of fabric filter spare parts, or immediate access to spare parts and a minimum of 10% of the total number of bags in the fabric filter in inventory at all times or shall maintain immediate access to, or availability of such replacement bags from a supplier.

**II. Operational Restrictions**

1. The permittee shall employ only natural gas to fire the furnace burners.

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

None

#### **IV. Reporting Requirements**

**None**

#### **V. Testing Requirements**

**1.** Compliance with the emission limitation(s) in Section B.I of these terms and conditions shall be determined in accordance with the following method(s):

**1.a** Emission Limitation:  
There shall be no visible emissions (0% opacity, as a 6-minute average) from the fabric filter and combustion stacks serving this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

**1.b** Emission Limitation:  
There shall be no visible fugitive particulate emissions from any part of the emissions unit or control equipment.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22.

**1.c** Emission Limitations:  
Particulate emissions from the fabric filter stack serving this emissions unit shall not exceed 0.01 gr/dscf (2.57 lbs/hr).

Particulate emissions from the combustion stack serving this emissions unit shall not exceed 2.99 lbs/hr.

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 limitations of 0.01 gr/dscf (2.57 lbs/hr) for the fabric filter stack and 2.99 lbs/hr for the combustion stack in accordance with the requirements specified in Sections A.V.1.c and A.V.1.d.

#### **VI. Miscellaneous Requirements**

**None**

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

**Emissions Unit ID:** Aluminum Scrap Melting Furnace No.4 (P913)

**Activity Description:** Natural gas fired aluminum scrap melting furnace No. 4.

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
110-ton aluminum holding reverberatory furnace (Furnace No. 4) equipped with a enclosed hood with doors. This hood captures all emissions (as determined by tests) generated by charging, fluxing, skimming, demagging and degassing operations. A blower draws these emissions from the top of the hood and discharges them into a 75,000 acfm (at 200 degrees F.) fabric filter shared by Furnaces Nos. 2 and 4. Furnace No. 4 has two natural gas-fired burners with a maximum total heat input capacity of 24 mmBtu/hr.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-07(B)(1)	Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	Employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.  See Sections A.I.2.a through A.I.2.d below.
Demagging and degassing of the molten aluminum is performed using the demagging system which consists of injecting gaseous chlorine into the molten aluminum stream at the discharge of the pump. The molten aluminum is recirculated in the furnace and demagged until the desired magnesium content is obtained.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 9.12 lbs/hr.

##### 2. Additional Terms and Conditions

- 2.a** The permittee shall ensure that the baffle between the charging well and furnace is properly operated to prevent the entry of excess flux and dross into the furnace combustion chamber in order to minimize the release of visible fugitive particulate emissions.
- 2.b** The two large front doors of the enclosed hood shall be kept closed at all times during the entire melting, fluxing, skimming and other fume-producing operations.
- 2.c** The skim window shall be kept closed as needed to minimize or eliminate fugitive particulate emissions.

## **2. Additional Terms and Conditions (continued)**

- 2.d** This facility shall employ procedures for unloading and disposal of the dust collected in the fabric filter to minimize or eliminate visible emissions of any dust that may become accumulated underneath the fabric filter, including expeditious elimination of the cause of the dust spill and removal of the dust.
- 2.e** This emissions unit and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the applicable and appropriate recommendations of the respective manufacturers in order to minimize air contaminant emissions.

## **II. Operational Restrictions**

- 1.** The maximum charging process weight rate shall not exceed the maximum charging process weight rate established during the most recent emission test that demonstrated that the emissions unit was in compliance. The charging process weight rate is the sum total of aluminum scrap, alloying agents and flux charged to the furnace.
- 2.** The amount of dirty (contaminated with oil, grease, plastic, paint, etc.) aluminum scrap charged to the furnace per heat shall not exceed the percentage of the charging process weight rate established during the most recent emission test that demonstrated that the emissions unit was in compliance.
- 3.** The chlorine injection rate into the pump shall not exceed the injection rate established during the most recent emission test that demonstrated that the emissions unit was in compliance.
- 4.** The hot dross skimmings, skimmed from the charging well, shall be retained in an enclosed area until sufficiently cooled (with unforced ambient air cooling only). The enclosed area shall be evacuated to the fabric filter in order to capture and control the fugitive emissions from the hot dross skimmings.
- 5.** The pressure drop across the fabric filter shall be maintained within the pressure drop range (in inches of water column) established during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

- 1.** The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the fabric filter when the emissions unit is processing material. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s).
- 2.** The permittee shall properly install, operate and maintain equipment to monitor the chlorine injection rate into the pump when 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).
- 3.** The permittee shall collect and record the following information for each day:
  - a. the pressure drop across the fabric filter at the beginning of each shift when the emissions unit is in operation;
  - b. the chlorine injection rate into the pump at the beginning of each shift when the emissions unit is in operation;
  - c. the identification number of each heat;
  - d. the starting and ending times of each heat;
  - e. the date and hours of furnace operation; and
  - f. the net weight and type of scrap and percent dirty scrap in the scrap and materials charged in each heat.

### **III. Monitoring and/or Record Keeping Requirements (continued)**

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the capture points and stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
5. Regular tests, calibrations and maintenance work on the chlorine system shall be recorded in a hard-bound log book.

The permittee shall also maintain written monthly records of the following:

- a. inspections of the chlorine vaporizing system;
- b. inspections of the air packs;
- c. inspections of the B & C emergency repair kits; and
- d. safety meeting minutes concerning the safe handling of chlorine and the operation of the chlorine safety systems at the permittee's facility.

### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify the following:
  - a. all periods of time during which the pressure drop across the fabric filter did not comply with the allowable range when the emissions unit was in operation;
  - b. all periods of time during which the maximum charging process weight rate was exceeded;
  - c. all periods of time during which the percent dirty scrap in the total charging process weight rate was exceeded;
  - d. all periods of time when the hot dross skimmings were not retained in a enclosed area until sufficiently cooled; and
  - e. any exceedances of the chlorine injection rate when the emissions unit was in operation.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the capture points and stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

### **V. 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):

## **V. Testing Requirements (continued)**

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

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

- 1.b** Emission Limitation:  
Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

- 1.c** Emission Limitation:  
Particulate emissions shall not exceed 9.12 lbs/hr.

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 of 9.12 lbs/hr in accordance with the following requirements:

The particulate emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.

Compliance with the allowable mass emission rate for particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10). If applicable, alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

- 1.d** 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 operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA 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.

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.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<p>110-ton aluminum holding reverberatory furnace (Furnace No. 4) equipped with a enclosed hood with doors. This hood captures all emissions (as determined by tests) generated by charging, fluxing, skimming, demagging and degassing operations. A blower draws these emissions from the top of the hood and discharges them into a 75,000 acfm (at 200 degrees F.) fabric filter shared by Furnaces Nos. 2 and 4. Furnace No. 4 has two natural gas-fired burners with a maximum total heat input capacity of 24 mmBtu/hr.</p> <p>Demagging and degassing of the molten aluminum is performed using the demagging system which consists of injecting gaseous chlorine into the molten aluminum stream at the discharge of the pump. The molten aluminum is recirculated in the furnace and demagged until the desired magnesium content is obtained.</p>	<p>OAC rule 3745-31-05 (PTI 13-2327)</p>	<p>Particulate emissions from the fabric filter stack serving this emissions unit shall not exceed 0.01 gr/dscf.**</p> <p>Particulate emissions from the combustion stack serving this emissions unit shall not exceed 2.99 lbs/hr.</p> <p>There shall be no visible emissions (0% opacity, as a 6-minute average) from the fabric filter and combustion stacks serving this emissions unit.</p> <p>There shall be no visible fugitive particulate emissions from any part of the emissions unit or control equipment.</p>

**2. Additional Terms and Conditions**

- 2.a \*\* The fabric filter controls particulate emissions from emissions units P912 and P913. The 0.01 gr/dscf emission limitation is equivalent to 2.57 lbs/hr when only one furnace is in operation; and 5.15 lbs/hr when both furnaces are operating simultaneously.
- 2.b This facility shall maintain an adequate supply of fabric filter spare parts, or immediate access to spare parts and a minimum of 10% of the total number of bags in the fabric filter in inventory at all times or shall maintain immediate access to, or availability of such replacement bags from a supplier.

**II. Operational Restrictions**

1. The permittee shall employ only natural gas to fire the furnace burners.

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

None

#### **IV. Reporting Requirements**

**None**

#### **V. Testing Requirements**

**1.** Compliance with the emission limitation(s) in Section B.I of these terms and conditions shall be determined in accordance with the following method(s):

**1.a** Emission Limitation:  
There shall be no visible emissions (0% opacity, as a 6-minute average) from the fabric filter and combustion stacks serving this emissions unit.

Applicable Compliance Method:  
Compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

**1.b** Emission Limitation:  
There shall be no visible fugitive particulate emissions from any part of the emissions unit or control equipment.

Applicable Compliance Method:  
Compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22.

**1.c** Emission Limitations:  
Particulate emissions from the fabric filter stack serving this emissions unit shall not exceed 0.01 gr/dscf (2.57 lbs/hr).

Particulate emissions from the combustion stack serving this emissions unit shall not exceed 2.99 lbs/hr.

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 limitations of 0.01 gr/dscf (2.57 lbs/hr) for the fabric filter stack and 2.99 lbs/hr for the combustion stack in accordance with the requirements specified in Sections A.V.1.c and A.V.1.d.

#### **VI. Miscellaneous Requirements**

**None**

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