



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
STARK COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 15-01487

DATE: 2/26/2002

Thakar Aluminum Corp. - Canton Facility
Ron Sturzinger
1364 Olds Street
Sandusky, OH 44870

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: USEPA

Canton LAA



**Permit To Install
Terms and Conditions**

**Issue Date: 2/26/2002
Effective Date: 2/26/2002**

FINAL PERMIT TO INSTALL 15-01487

Application Number: 15-01487
APS Premise Number: 1576001813
Permit Fee: **\$1200**
Name of Facility: Thakar Aluminum Corp. - Canton Facility
Person to Contact: Ron Sturzinger
Address: 1364 Olds Street
Sandusky, OH 44870

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4416 Louisville Road
Canton, Ohio**

Description of proposed emissions unit(s):
Two reveratory aluminum melting furnaces.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS**A. Permit to Install General Terms and Conditions****1. Compliance Requirements**

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

2. Reporting Requirements Related to Monitoring and Record keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

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

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

Thakar Aluminum Corp. - Canton Facility
PTI Application: 15-01487
Issued: 2/26/2002

Facility ID: 1576001813

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Particulate	19.3
NO _x	11.3
OC	0.53
CO	0.30
SO ₂	0.08

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
<p>P901 - natural gas fired aluminum reverberatory furnace, 18 mmBtu/hr heat input capacity and 4 tons per hour melt capacity. Known as OH #1 Furnace .</p> <p>This emissions unit is not controlled, and has both fugitive and stack emissions. The emissions from this emissions unit are believed to be split 50/50 between fugitive and stack.</p>	<p>OAC rule 3745-31-05(A)(3)</p> <p>OAC rule 3745-17-07(A)(1)</p> <p>OAC rule 3745-17-07(B)(1)</p> <p>OAC rule 3745-17-08(A)</p> <p>OAC rule 3745-17-11</p> <p>40 CFR part 63 subpart RRR</p>

Applicable Emissions
Limitations/Control Measures

The nitrogen oxide (NO_x) emissions shall not exceed 2.57 lbs/hr and 11.3 tons/yr.

The organic compound (OC) emissions shall not exceed 0.12 lb/hr and 0.53 ton/yr.

The particulate emissions shall not exceed 4.4 lbs/hr and 19.3 tons/yr.

The carbon monoxide (CO) emissions shall not exceed 0.07 lb/hr and 0.30 ton/yr.

The sulfur dioxide (SO₂) emissions shall not exceed 0.02 lb/hr and 0.08 ton/yr.

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

Visible particulate emissions from the stacks serving this emissions unit shall not exceed five percent opacity, as a six-minute average.

See sections B.1, B.2, B.3, B.4 and B.5 below.

The requirements of this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).

The requirements of this rule are

less stringent than the requirements of OAC rule 3745-31-05(A)(3).

See section 2.a below.

The requirements of this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).

See section A.2.b below.

2. Additional Terms and Conditions

- 2.a** The permittee shall employ control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
- 2.b** This emissions unit is exempt from this rule because it is a Group 2 furnace. A Group 2 furnace is defined as follows: "furnace of any design that melts, holds, or processes only clean charge and that performs no fluxing or performs fluxing using nonreactive, non-HAP-containing/non-HAP-generating gases or agents." Clean charge is defined as follows: "materials including molten aluminum; T-bar; sow; ingot; billet; pit; alloying elements; uncoated/unpainted thermally dried aluminum chips; aluminum scrap dried at 650 degrees Fahrenheit or higher; aluminum scrap delacquered/decoated at 900 degrees Fahrenheit or higher; other oil- and lubricant-free unpainted/uncoated gates and risers; oil-and lubricant-free unpainted/uncoated aluminum scrap, shapes, or products (e.g., pistons) that have not undergone any process (e.g., machining, coating, painting, etc.) that would cause contamination of the aluminum (with oils, lubricants, coatings, or paints); and internal runaround."

B. Operational Restrictions

1. The permittee shall only fire natural gas as fuel in this emissions unit.
2. The aluminum melting furnace shall be charged with clean aluminum material (i.e., ingots, bar stock, dry, sawed-off pieces of solid aluminum, aluminum chips and turnings from machining). Materials bearing oil, grease, paint, coatings, lubricants, paper, rubber, plastic, rags or other foreign materials shall not be employed.
3. Chlorine shall not be added for damaging the aluminum.
4. Alloying, if any is performed in this emissions unit, shall be done employing only clean materials.
5. This emissions unit shall perform fluxing using nonreactive, non-HAP-containing/non-HAP-generating gases or agents.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions escaping from the building containing 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 abnormal visible emission incident; and
 - e. Any corrective actions taken to eliminate the abnormal visible emissions.
2. If any visible emissions in excess of 5 percent opacity are observed, corrective actions shall be employed to eliminate any visible emissions in excess of 5 percent opacity, these actions shall also be noted in the operations log.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports which:
 - a. Identify all days during which any abnormal visible fugitive particulate emissions were observed escaping from the building containing this emissions unit and visible emissions in excess of 5 percent opacity; and
 - b. Describe any corrective actions taken to eliminate the abnormal visible fugitive particulate emissions, or visible emissions greater than 5 percent opacity.

These reports shall be submitted to the Canton local air agency by January 31 and July 31 of each year and shall cover the previous 6-month period. If no abnormal visible fugitive particulate emissions were observed during the period, a negative declaration shall be submitted.

2. If no visible emissions exceeded 5 percent opacity, and no unusual visible emissions were observed during the reporting period, the permittee shall submit a report which states no visible emissions exceeding 5 percent opacity, and no unusual visible emissions were observed during the reporting period.
3. The permittee shall submit a deviation (excursion) report for all instances in which any materials other than clean aluminum ingots, bar stock and dry, sawed-off pieces of solid aluminum, aluminum chips and turnings from machining, or clean alloying materials were charged into this emissions unit.
4. The permittee shall submit a deviation (excursion) report for all instances in which materials bearing oil, grease, paint, coatings, lubricants, paper, rubber, plastic, rags or other foreign material were charged into this emissions unit.

E. Testing Requirements

1. Compliance with the emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

The particulate emissions shall not exceed 4.4 lbs/hr and 19.3 tons/yr.

Applicable Compliance Method:

If required, compliance with the pound-per-hour emission limitation shall be obtained by stack testing in accordance with Method 5, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA if necessary.

Compliance with the tons-per-year particulate emission limitation shall be demonstrated by multiplying the average hourly emission rate based on Method 5 test results by the number of hours the emissions unit operated during the year.

- b. Emissions Limitation:

The nitrogen oxide (NO_x) emissions shall not exceed 2.57 lbs/hr and 11.3 tons/yr.

Applicable Compliance Method:

If required, compliance with the pound-per-hour emission limitation shall be obtained by stack testing in accordance with Method 7 or 7E, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA if necessary.

Compliance with the tons-per year NO_x emissions limitation shall be demonstrated by multiplying the average hourly emission rate obtained from the Method 7 or 7E test results by the number of hours the emissions unit operated during the year.

- c. Emissions Limitation:

The carbon monoxide (CO) emissions shall not exceed 0.07 lb/hr and 0.3 ton/yr.

Applicable Compliance Method:

If required, compliance with the pound-per-hour emissions limitation shall be obtained by stack testing in accordance with Method 10, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA if necessary.

Compliance with the tons-per-year CO emissions limitation shall be demonstrated by multiplying the average hourly emission rate obtained from the Method 10 test results by the number of hours the emissions unit operated during the year.

d. Emissions Limitation:

The organic compound (OC) emissions shall not exceed 0.12 lb/hr and 0.53 ton/yr.

Applicable Compliance Method:

If required, compliance with the pound-per-hour emissions limitation shall be obtained by stack testing in accordance with Method 25 or 25A, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA if necessary.

Compliance with the tons-per-year organic compound emissions limitation shall be demonstrated by multiplying the average hourly emission rate obtained from the Method 25 or 25A stack test results by the number of hours the emissions unit operated during the year.

e. Emissions Limitation:

The sulfur dioxide (SO₂) emissions shall not exceed 0.02 lb/hr and 0.08 ton/yr.

Applicable Compliance Method:

If required, compliance with the pound-per-hour emissions limitation shall be obtained by stack testing in accordance with Method 6 or 6C, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA if necessary.

Compliance with the tons-per-year SO₂ emissions limitation shall be demonstrated by multiplying the average hourly emission rate obtained from the Method 6 or 6C stack test results by the number of hours the emissions unit operated during the year.

f. Emissions Limitation:

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

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3)

g. Emissions Limitation:

Visible particulate emissions from the stacks serving this emissions unit shall not exceed

five percent opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" is not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P902 - natural gas fired aluminum reverberatory furnace, 18 mmBtu/hr heat input capacity and 4 tons per hour melt capacity. Known as OH #2 Furnace .	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(A)(1)
This emissions unit is not controlled, and has both fugitive and stack emissions.	OAC rule 3745-17-07(B)(1)
	OAC rule 3745-17-08(A)
	OAC rule 3745-17-11
	40 CFR part 63 subpart RRR

Applicable Emissions
Limitations/Control Measures

The nitrogen oxide (NO_x) emissions shall not exceed 2.57 lbs/hr and 11.3 tons/yr.

The organic compound (OC) emissions shall not exceed 0.12 lb/hr and 0.53 ton/yr.

The particulate emissions shall not exceed 4.4 lbs/hr and 19.3 tons/yr.

The carbon monoxide (CO) emissions shall not exceed 0.07 lb/hr and 0.30 ton/yr.

The sulfur dioxide (SO₂) emissions shall not exceed 0.02 lb/hr and 0.08 ton/yr.

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

Visible particulate emissions from the stacks serving this emissions unit shall not exceed five percent opacity, as a six-minute average.

See sections B.1, B.2, B.3, B.4 and B.5 below.

The requirements of this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).

The requirements of this rule are

less stringent than the requirements of OAC rule 3745-31-05(A)(3).

See section 2.a below.

The requirements of this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).

See section A.2.b below.

2. Additional Terms and Conditions

- 2.a** The permittee shall employ control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
- 2.b** This emissions unit is exempt from this rule because it is a Group 2 furnace. A Group 2 furnace is defined as follows: "furnace of any design that melts, holds, or processes only clean charge and that performs no fluxing or performs fluxing using nonreactive, non-HAP-containing/non-HAP-generating gases or agents." Clean charge is defined as follows: "materials including molten aluminum; T-bar; sow; ingot; billet; pit; alloying elements; uncoated/unpainted thermally dried aluminum chips; aluminum scrap dried at 650 degrees Fahrenheit or higher; aluminum scrap delacquered/decoated at 900 degrees Fahrenheit or higher; other oil- and lubricant-free unpainted/uncoated gates and risers; oil-and lubricant-free unpainted/uncoated aluminum scrap, shapes, or products (e.g., pistons) that have not undergone any process (e.g., machining, coating, painting, etc.) that would cause contamination of the aluminum (with oils, lubricants, coatings, or paints); and internal runaround."

B. Operational Restrictions

1. The permittee shall only fire natural gas as fuel in this emissions unit.
2. The aluminum melting furnace shall be charged with clean aluminum material (i.e., ingots, bar stock, dry, sawed-off pieces of solid aluminum, aluminum chips and turnings from machining). Materials bearing oil, grease, paint, coatings, lubricants, paper, rubber, plastic, rags or other foreign materials shall not be employed.
3. Chlorine shall not be added for damaging the aluminum.
4. Alloying, if any is performed in this emissions unit, shall be done employing only clean materials.
5. This emissions unit shall perform fluxing using nonreactive, non-HAP-containing/non-HAP-generating gases or agents.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions escaping from the building containing 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 abnormal visible emission incident; and
 - e. Any corrective actions taken to eliminate the abnormal visible emissions.
2. If any visible emissions in excess of 5 percent opacity are observed, corrective actions shall be employed to eliminate any visible emissions in excess of 5 percent opacity, these actions shall also be noted in the operations log.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports which:
 - a. Identify all days during which any abnormal visible fugitive particulate emissions were observed escaping from the building containing this emissions unit and visible emissions in excess of 5 percent opacity; and
 - b. Describe any corrective actions taken to eliminate the abnormal visible fugitive particulate emissions, or visible emissions greater than 5 percent opacity.

These reports shall be submitted to the Canton local air agency by January 31 and July 31 of each year and shall cover the previous 6-month period. If no abnormal visible fugitive particulate emissions were observed during the period, a negative declaration shall be submitted.

2. If no visible emissions exceeded 5 percent opacity, and no unusual visible emissions were observed during the reporting period, the permittee shall submit a report which states no visible emissions exceeding 5 percent opacity, and no unusual visible emissions were observed during the reporting period.
3. The permittee shall submit a deviation (excursion) report for all instances in which any materials other than clean aluminum ingots, bar stock and dry, sawed-off pieces of solid aluminum, aluminum chips and turnings from machining, or clean alloying materials were charged into this emissions unit.
4. The permittee shall submit a deviation (excursion) report for all instances in which materials bearing oil, grease, paint, coatings, lubricants, paper, rubber, plastic, rags or other foreign material

were charged into this emissions unit.

E. Testing Requirements

1. Compliance with the emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

The particulate emissions shall not exceed 4.4 lbs/hr and 19.3 tons/yr.

Applicable Compliance Method:

If required, compliance with the pound-per-hour emission limitation shall be obtained by stack testing in accordance with Method 5, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA if necessary.

Compliance with the tons-per-year particulate emission limitation shall be demonstrated by multiplying the average hourly emission rate based on Method 5 test results by the number of hours the emissions unit operated during the year.

- b. Emissions Limitation:

The nitrogen oxide (NO_x) emissions shall not exceed 2.57 lbs/hr and 11.3 tons/yr.

Applicable Compliance Method:

If required, compliance with the pound-per-hour emission limitation shall be obtained by stack testing in accordance with Method 7 or 7E, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA if necessary.

Compliance with the tons-per year NO_x emissions limitation shall be demonstrated by multiplying the average hourly emission rate obtained from the Method 7 or 7E test results by the number of hours the emissions unit operated during the year.

- c. Emissions Limitation:

The carbon monoxide (CO) emissions shall not exceed 0.07 lb/hr and 0.3 ton/yr.

Applicable Compliance Method:

If required, compliance with the pound-per-hour emissions limitation shall be obtained by stack testing in accordance with Method 10, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA if necessary.

Compliance with the tons-per-year CO emissions limitation shall be demonstrated by multiplying the average hourly emission rate obtained from the Method 10 test results by the number of hours the emissions unit operated during the year.

- d. Emissions Limitation:
The organic compound (OC) emissions shall not exceed 0.12 lb/hr and 0.53 ton/yr.

Applicable Compliance Method:

If required, compliance with the pound-per-hour emissions limitation shall be obtained by stack testing in accordance with Method 25 or 25A, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA if necessary.

Compliance with the tons-per-year organic compound emissions limitation shall be demonstrated by multiplying the average hourly emission rate obtained from the Method 25 or 25A stack test results by the number of hours the emissions unit operated during the year.

- e. Emissions Limitation:
The sulfur dioxide (SO₂) emissions shall not exceed 0.02 lb/hr and 0.08 ton/yr.

Applicable Compliance Method:

If required, compliance with the pound-per-hour emissions limitation shall be obtained by stack testing in accordance with Method 6 or 6C, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA if necessary.

Compliance with the tons-per-year SO₂ emissions limitation shall be demonstrated by multiplying the average hourly emission rate obtained from the Method 6 or 6C stack test results by the number of hours the emissions unit operated during the year.

- f. Emissions Limitation:
Visible particulate emissions of fugitive dust shall not exceed five percent opacity, as a three-minute average.

Applicable Compliance Method:
OAC rule 3745-17-03(B)(3)

- g. Emissions Limitation:

Thakar Aluminum Corp. - Canton Facility

PTI Application: 15-01497

Issued

Facility ID: 1576001813

Emissions Unit ID: **P902**

Visible particulate emissions from the stacks serving this emissions unit shall not exceed five percent opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emissions limitation shall be determined in accordance with the test methods and procedures in 40 CFR Part 60, Appendix A, Method 9.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" is not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

NEW SOURCE REVIEW FORM B

PTI Number: 15-01487 Facility ID: 1576001813

FACILITY NAME Thakar Aluminum Corp. - Canton Facility

FACILITY DESCRIPTION Two reveratory aluminum melting CITY/TWP Canton

Emissions Unit ID: P902

SIC CODE 3341 SCC CODE 30400103 EMISSIONS UNIT ID P901

EMISSIONS UNIT DESCRIPTION Aluminum reveratory melting furnace OH1

DATE INSTALLED Construction is scheduled to start in June 2002.

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Table with 6 columns: Pollutants, Air Quality Description, Actual Emissions Rate (Short Term Rate, Tons Per Year), PTI Allowable (Short Term Rate, Tons Per Year). Rows include Particulate Matter, PM10, Sulfur Dioxide, Organic Compounds, Nitrogen Oxides, Carbon Monoxide, Lead, and Other: Air Toxics.

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Using clean charging material

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: NA

