



**Environmental  
Protection Agency**

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

February 3, 2011

**RE: Tuscarawas County  
IMCO Recycling of Ohio LLC  
Facility Id #:0679030152  
EU #s: P017, P018, & P030  
COMPLIANCE TEST  
Notice of Violation  
HPV GC8 and MC1  
CERTIFIED: 70101060000178961771**

Brinley Brown  
IMCO Recycling of Ohio LLC  
7335 Newport Road SE  
Uhrichsville, OH 44683

Dear Mr. Brown:

On September 8 and 9, 2010, and October 12 and 13, 2010, Alley & Associates, Inc. performed particulate matter (PM), and Hydrochloric Acid (HCl) emissions compliance tests at the Aleris Rolling Mill portion of IMCO Recycling of Ohio, LLC. (IMCO) facility, 7319 Newport Road SE, in Uhrichsville, OH, on Emissions Units (EUs) P017, P018, and P030. The tests were conducted to meet the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63, Subpart RRR and to set operating parameters as required by the Operation, Maintenance, and Monitoring Plan revised on August 4, 2009. Ohio EPA received the test reports on October 8, 2010 and November 8, 2010. The test reports have been reviewed and we have concluded that the tests were conducted according to the procedures specified in 40 CFR Part 60, Appendix A, U.S. EPA Test Methods 1 – 5, and 26. The results of the September 2010 tests showed that EUs P017, P018 and P030 were not in compliance with the applicable Ohio EPA regulations and your facility permit terms and conditions, specifically EUs P017, P018 and P030 exceeded the PM emission limitations. EUs P017 and P018 were re-tested on October 12, 2010 and demonstrated compliance. The results of the October 13, 2010 re-test of EU P030 showed that it was not in compliance with the PM emission limitation.

Permit requirements and September test results for P017 and P018:

Test date	Emissions unit/pollutant:	Tested emission rate: (lbs/ton of feed per charge)	Allowable emission rate: (lbs/ton of feed per charge)	Tested furnace feed rate: (lbs/hr)	Maximum feed rate (lbs/hr):	Average test cycle time per charge (minutes)	Flux Pounds, lb
09/08/2010	P017, PM	3.5*	0.40	7239	20,000	128	100
09/08/2010	P017, HCL	0.22	0.40	7329	20,000	128	100
09/09/2010	P017, PM	0.87*	0.40	8504	20,000	147	25
09/09/2010	P017, HCL	0.10	0.40	8504	20,000	150	25
09/09/2010	P018, PM	1.00*	0.40	8701	20,000	147	50
09/09/2010	P018, HCL	0.06	0.40	8701	20,000	150	50

Permit requirements and September test results for P030:

Test date	Emissions unit/pollutant:	Tested emission rate: (lbs/ton)	Allowable emission rate: (lbs/ton)	Production ate:	Maximum feed rate (lbs/hr):	Chlorine Gas Addition: (lbs)
09/09/2010	P030, PM	0.017*	0.01	73,996	80,000	0.64

Permit requirements and October test results for P017 and P018:

Test date	Emissions unit/pollutant:	Tested emission rate: (lbs/ton of feed per charge)	Allowable emission rate: (lbs/ton of feed per charge)	Tested furnace feed rate: (lbs/hr)	Maximum feed rate (lbs/hr):	Average test cycle time per charge (minutes)	Flux Pounds, lb
10/13/2010	P017, PM	0.09	0.40	7,513	20,000	128	6.25
10/13/2010	P017, HCL	0.02	0.40	7,513	20,000	128	6.25
10/13/2010	P018, PM	0.31	0.40	7,485	20,000	147	6.25
10/13/2010	P018, HCL	0.01	0.40	7,485	20,000	150	6.25

Permit requirements and October test results for P030:

Test date	Emissions unit/pollutant:	Tested emission rate: (lbs/ton)	Allowable emission rate: (lbs/ton)	Production ate:	Maximum feed rate (lbs/hr):	Chlorine Gas Addition: (lbs)
10/13/2010	P030, PM	0.018*	0.01	76,099	80,000	1.79

**\*Tested emission rate exceeded the allowable emission rate**

On November 18, 2010, IMCO submitted a permit-to-install (PTI) application for installation of a new degassing unit (in-line fluxer; EU P037) to replace EU P030 at the Aleris Rolling Mill. Permit #P0107210 was issued on December 8, 2010 for EU P037, and compliance testing for the new in-line fluxer is required within 90 days of startup of the new emissions unit equipped with the permanent lime-injected baghouse. A determination of the company's compliance with the applicable PM and HCl emissions limitations will be made upon completion of that compliance test and review of the test report required to be submitted within 60 days of test completion.

However, please submit to this office, within 30 days of receipt of this letter, an explanation as to what conditions caused EUs P017, P018 and P030 to exceed the emissions limitations, and what test conditions were changed during the subsequent passing tests. Please submit the information to the attention of Kimbra Reinbold.

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Acceptance by Ohio EPA of the test results or any information submitted in response to this notice of violation does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Revised Code. The determination to pursue or to decline to pursue such penalties in this case will be made by Ohio EPA at a later date. All test information will be used by Ohio EPA personnel for permit processing and source compliance review. Please refer any questions concerning the above requirements to Kimbra Reinbold, Ohio EPA Southeast District Office, at (740) 380-5245.

Thank you for your cooperation in this matter.

Sincerely,



Marco Deshaies  
Environmental Specialist II  
Division of Air Pollution Control

MD/mlm

cc: Kimbra Reinbold, DAPC-SEDO (Emissions Unit File Copy)  
Marco Deshaies, DAPC-SEDO  
Bruce Weinberg, DAPC-SEDO  
William MacDowell, U.S. EPA Region V  
Tom Kalman, DAPC-CO  
Test Report File Copy