



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

May 13, 2010

**RE: Tuscarawas County
IMCO Recycling of Ohio Inc.
Facility Id #:0679030152
EU #: P913, P902, P909, F001,
F002, P901, P903, P905, P908
COMPLIANCE TEST
Notice of Violation
HPV GC8 and MC1
CERTIFIED: 70063450000190558904**

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

Dear Mr. Brown:

On scheduled days between July 14, 2009 through November 11, 2009, Alley & Associates, Inc. performed particulate matter (PM), dioxin and furans (D/F), total hydrocarbons (THC), and Hydrochloric Acid (HCL) emissions compliance tests at IMCO Recycling of Ohio (IMCO), 7335 Newport Road SE, in Uhrichsville, OH, on Emissions Units (EU) F001, F002, P901, P902, P903, P905, P908, P909, and P913. 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 August 28, 2009, November 17, 2009 and December 16, 2009. 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 Method(s) 1 – 5, 23, 25, and 26. The results of the July 17, 2009 test showed the EU P902 was not in compliance with the applicable Ohio EPA regulations and your facility permit terms and conditions, specifically the D/F emission limit. EU P902 was re-tested on September 29, 2009 and demonstrated compliance for D/F.

Permit requirements and July 2009 test results for P901, P902, P903, P905, P908:

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)
07/14/2009	P903, PM	0.11	0.40	7,061	7,500	128
07/14/2009	P903, D/F	10.0	15.0	7,061	7,500	128
07/15/2009	P903, HCL	0.013	0.40	6,210	7,500	147
07/14/2009	P901, HCL	0.013	0.40	6,117	7,500	150
07/15/2009	P901, PM	0.13	0.40	7,170	7,500	131
07/15/2009	P901, D/F	10.5	15.0	7,170	7,500	131
07/16/2009	P902, HCL	0.019	0.40	6,218	7,500	149
07/17/2009	P902, PM	0.10	0.40	7,204	7,500	129

Test date	Emissions unit/pollutant:	Tested emission rate: (lbs/ton)**	Allowable emission rate: (lbs/ton)**	Tested furnace feed rate:	Maximum feed rate (lbs/hr):	Average test cycle time per charge (minutes)
07/17/2009	P902, D/F	21.7*	15.0	7,204	7,500	129
07/16/2009	P905, PM	0.11	0.40	7,001	7,500	129
07/16/2009	P905, D/F	12.0	15.0	7,001	7,500	129
07/17/2009	P905, HCL	0.013	0.40	6,538	7,500	145
07/16/2009	P908, PM	0.14	0.40	7,062	7,500	129
07/16/2009	P908, D/F	7.8	15.0	7,062	7,500	129
07/17/2009	P908, HCL	0.017	0.40	6,437	7,500	142

*Tested emission rate exceeded the allowable emission rate

** D/F results are in $\mu\text{g}/\text{ton}$ of feed per charge

Operating parameters established during the July 2009 testing:

Affected Source	Operating parameter	Limit
P901	Chlorine lbs/ton Charged (maximum)	218
P901 Baghouse	Lime Flow Rate, lbs/hr (minimum)	75
P901 Baghouse	3-hour block average temp. (maximum)	302°F
P902	Chlorine lbs/ton Charged (maximum)	221
P902 Baghouse	Lime Flow Rate, lbs/hr (minimum)	46
P903	Chlorine lbs/ton Charged (maximum)	236
P903 Baghouse	Lime Flow Rate, lbs/hr (minimum)	47
P903 Baghouse	3-hour block average temp. (maximum)	278°F
P905	Chlorine lbs/ton Charged (maximum)	253
P905 Baghouse	Lime Flow Rate, lbs/hr (minimum)	38
P905 Baghouse	3-hour block average temp. (maximum)	290°F
P908	Chlorine lbs/ton Charged (maximum)	248
P908 Baghouse	Lime Flow Rate, lbs/hr (minimum)	46
P908 Baghouse	3-hour block average temp. (maximum)	293°F

Permit requirements and Sept./Oct. test results for P902, P909, F001, and F002:

Test date	Emissions unit/pollutant:	Tested emission rate: (lbs/ton)**	Allowable emission rate: (lbs/ton)**	Tested furnace feed rate: (lbs/hr)	Maximum feed rate (lbs/hr):	Average test cycle time per charge (minutes)
09/29/2009	P902, D/F – UBC feed	9.2	15.0	6,598	7,500	124
10/01/2009	P902, D/F – MLC feed	5.9	15.0	6,598	7,500	140
09/30/2009	P909, D/F	0.40	5.0	16,210	28,000	193
09/30/2009	P909, THC	0.023	0.20	16,210	28,000	193
09/30/2009	P909, HCL	0.89	1.50	16,210	28,000	193
09/30/2009	P909, PM	0.05	0.30	16,210	28,000	193
09/30/2009	F001, PM	0.0012	0.010	52,227	46,000	129
10/02/2009	F002, PM	0.0004	0.010	40,350	46,000	163

** D/F results are in $\mu\text{g}/\text{ton}$ of feed per charge

Operating parameters established during the Sept. and Oct. 2009 testing:

Affected Source	Operating parameter	Limit
P902 Baghouse*	3-hour block average temp. (maximum)	266°F
P909 Afterburner	3-hour block average temp. (maximum)	1,609°F
P909 Baghouse	3-hour block average temp. (maximum)	345°F
P909 Baghouse	Lime Flow Rate, lbs/hr (minimum)	44 lbs/hr

*Lime flow rate and chlorine amounts set during the 7/16/2009 testing

Permit requirements and November test results for P913:

Test date	Emissions unit/pollutant:	Tested emission rate: (lbs/ton)**	Allowable emission rate: (lbs/ton)**	Tested furnace feed rate: (lbs/hr)	Maximum feed rate (lbs/hr):	Average test cycle time per charge (minutes)
11/10/2009	P913, PM	0.029	0.40	8,121	13,500	227
11/10/2009	P913, D/F	0.24	15.0	8,121	13,500	227
11/10/2009	P913, HCL	0.0016	0.40	8,121	13,500	227

** D/F results are in $\mu\text{g}/\text{ton}$ of feed per charge

Operating parameters established during the November 2009 testing:

Affected Source	Operating parameter	Limit
P913 Baghouse	Lime Flow Rate, lbs/hr (minimum)	49.5
P913	Chlorine lbs/ton Charged (maximum)	167
P913 Baghouse	3-hour block average temp. (maximum)	121.6°F

Please submit to this office, within 30 days of receipt of this letter, an explanation as to what conditions caused EU P902 to exceed the emissions limit, and what test conditions were changed during the subsequent passing tests. Submit the information to the attention of Kim Reinbold.

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 Kim Reinbold, Ohio EPA Southeast District Office, at (740) 380-5245.

Brinley Brown
IMCO Recycling of Ohio, Inc.
May 13, 2010
Page 4

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Marco Deshaies". The signature is written in a cursive style with a large initial "M".

Marco Deshaies
Environmental Specialist
Division of Air Pollution Control

MD/mlm

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