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

7/2/2013

Certified Mail

Chris Kisor
Echo Environmental Waverly
479 Industrial Park Drive
Waverly, OH 45690

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0666015003
Permit Number: P0112979
Permit Type: Initial Installation
County: Pike

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-SEDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Echo Environmental Waverly

Facility ID:	0666015003
Permit Number:	P0112979
Permit Type:	Initial Installation
Issued:	7/2/2013
Effective:	7/2/2013
Expiration:	7/2/2023

Division of Air Pollution Control
Permit-to-Install and Operate
for
Echo Environmental Waverly

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Authorization

Facility ID:	0666015003
Application Number(s):	A0046902
Permit Number:	P0112979
Permit Description:	Initial installation of Thermal Reduction Unit (TRU) #1, with 1.2 million BTU/hr total burner input capacity in the primary chamber and one 1.55 million BTU/hr input capacity burner in the afterburner.
Permit Type:	Initial Installation
Permit Fee:	$200.00
Issue Date:	7/2/2013
Effective Date:	7/2/2013
Expiration Date:	7/2/2023

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Echo Environmental Waverly
479 Industrial Park Drive
Waverly, OH 45690

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0112979
Permit Description: Initial installation of Thermal Reduction Unit (TRU) #1, with 1.2 million BTU/hr total burner input capacity in the primary chamber and one 1.55 million BTU/hr input capacity burner in the afterburner.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**N001**
Company Equipment ID:	Thermal Reduction Unit
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement.Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is takenby Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Southeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. N001, Thermal Reduction Unit

Operations, Property and/or Equipment Description:

Natural gas fired, Thermal Reduction Unit (TRU) #1, with 1.2 million BTU/hr total burner input capacity with a lower temperature limit of 400 degrees F. in the primary chamber and one 1.55 million BTU/hr input capacity burner with a lower temperature limit of 1,800 degrees F. in the afterburner and a minimum two second retention time. The TRU's afterburner is vented to a lime injected, 26,487 cfmbaghouse. The TRU is a batch process with a maximum load of 900 pounds of scrap per batch and a burn time of two hours. The clean-out/turnaround time is one half hour. The potential annual throughput of the TRU is 1,576.8 tons per year (900 lb/batch ÷ 2.5 hr/batch x 8,760 hr/yr ÷ 2,000 lb/ton = 1,576.8 tons/yr).

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. g)(1).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) shall not exceed 0.002 gr/dscf of exhaust gases and 1.58 tons per year. Sulfur dioxide (SO_2) emissions shall not exceed 0.26 lb/hr and 0.91 ton per year. Nitrogen oxides (NO_x) emissions shall not exceed 2.83 lbs/hr and 9.92 tons per year. Carbon monoxide (CO) emissions shall not exceed 0.02 lb/hr and 0.08 ton per

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		year. Volatile organic compound (VOC) emissions shall not exceed 0.10 lb/hr and 0.36 ton per year. Visible PE from the stack serving this emissions unit shall not exceed 10% opacity as a six-minute average. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)c.
c.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule. This PE limitation is less stringent than the limitation listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-15 as part of the State Implementation Plan.
d.	OAC rule 3745-17-09(B)	PE shall not exceed 0.10 pound per 100 pounds charged. This PE limitation is the basis for the PE limitationsestablished under OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-09(C)	See b)(2)a.

(2) Additional Terms and Conditions

a. This thermal reduction unit and all associated equipment and grounds shall be designed, operated, and maintained so as to prevent the emission of objectionable odors.

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform with ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for sources having potential to emit, taking into account controls, less than ten tons per year of emissions of

an NAAQS pollutant or precursor. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirements to satisfy BAT still exist as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then the emission limits listed above in b)(1)a. no longer apply. Other requirements listed above in b)(1)a. will no longer apply under that rule, but may still apply under different rules (see d. below).

c. This rule only applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan. In that case only, the following Terms and Conditions shall apply:

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, SO_2, NO_x, CO and VOC emissions from this air contaminant source since the uncontrolled potential to emit for PE, SO_2, NO_x, CO and VOC emissions are less than ten tons per year each.

d. The stack shall be designed to minimize any building downwash impacts from emissions and/or odors on employees and nearby residences. The design shall meet good engineering practices so as not to result in excessive concentrations of air contaminants and/or odors in locations at, near or in such a configuration as to affect any air intake for heating and cooling of buildings or at operable windows or doors.

e. The owner or operator shall manage all ash and other wastes generated in accordance with the applicable solid waste or hazardous waste requirements in Chapter 3734 of the Ohio Revised Code and the rules adopted thereunder.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in the burners of this thermal reduction unit.

(2) The actual burn time used to complete each thermal reduction shall be based on the charge weight and the manufacturer's recommendation for that weight, provided that the charge rate for each thermal reduction does not exceed 450 lbs of material per hour or 900 pounds per two hour burn cycle.

(3) This thermal reduction unit shall be equipped with an afterburner designed to achieve at least 2.0 seconds retention time in the secondary chamber. The afterburner shall be used at all times this thermal reduction unit is in operation.

(4) The thermal reduction unit shall not be operated unless the temperature monitoring devices are operating properly.

(5) The thermal reduction unit shall be operated only by adequately trained personnel.

(6) Ashes shall be removed from the primary chamber after each thermal reduction.

(7) To the extent possible, oily materials, PVC's, or other non-conforming materials shall be removed from the material charged to this thermal reduction unit.

(8) This thermal reduction unit shall not be used to dispose of any "medical or infectious waste" as defined in OAC rule 3745-75-01.

(9) The emissions from this emissions unit shall be vented to the baghouse at all times when the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) This thermal reduction unit shall be installed, operated, and maintained in accordance with the manufacturer's specifications. This includes but is not limited to:

a. at the start of each thermal reduction, the afterburner exit gas temperature must reach the minimum temperature recommended by the manufacturer, but not less than 1,800 degrees Fahrenheit before ignition of the primary burner;

b. after ignition of the primary burner, the afterburner exit gas shall be maintained at or above a minimum temperature of 1,800 degrees Fahrenheit during the entire thermal reduction cycle except for the brief period of time when the charge is inserted into the primary chamber allowing excess air to enter the thermal reduction unit; and

c. the primary chamber exit gas shall be maintained at or above a minimum temperature of 400 degrees Fahrenheit during the entire thermal reduction cycle except for the brief period of time when the charge is inserted into the primary chamber allowing excess air to enter the thermal reduction unit.

(2) The permittee shall install, operate, and properly maintain temperature gauges which continuously monitor the temperatures of the primary chamber exit gas and the afterburner exit gas.

(3) The permittee shall perform daily checks, when the thermal reduction unit is in operation and when the weather conditions allow, for any visible particulate emissions from the exhaust 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 observed visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(4) The permittee shall maintain daily records of the following information for this thermal reduction unit:

a. at the start of each thermal reduction, record the temperature of the afterburner exit gas in degrees Fahrenheit before ignition of the primary burner;

b. for each thermal reduction, record all periods of time during which the temperature of the afterburner exit gas dropped below 1,800 degrees Fahrenheit (except as noted in d)(1)b. above) and the corrective actions that were taken to achieve proper operating temperature;

c. for each thermal reduction, record all periods of time during which the temperature of the primary chamber exit gas dropped below 400 degrees Fahrenheit (except as noted in d)(1)c. above) and the corrective actions that were taken to achieve proper operating temperature;

d. the total weight of each charge in pounds;

e. the amount of actual burn time needed to complete thermal reduction for each charge; and

(5) The permittee shall maintain monthly records of the following information for this thermal reduction unit:

a. the total weight of material charged each month in pounds and/or tons; and

b. the total weight of material charged on a calendar year basis, in tons.

(6) The permittee shall inspect this thermal reduction unit using preventive maintenance procedures recommended by the equipment manufacturer. The inspection should be done at least semi-annually (more often if recommended by the equipment manufacturer). Each inspection shall include a written log which documents the findings of the inspection and identifies any needed cleaning or repairs to both the primary burner and afterburner chambers. If cleaning or repairs are needed, the thermal reduction unit shall not be operated if the operation would result in any exceedance of the emission limits detailed in this permit

(7) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this thermal reduction unit.

(e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Southeast District Office.

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

PE shall not exceed 0.002 gr/dscf of exhaust gases and 1.58 tons per year.

Applicable Compliance Method:

The short term emissions limitation is based on the following calculation:

(450 lbs scrap/hr)(0.10 lb PE/100 lbs scrap)(7,000 gr/1 lb)(1 hr/60 min)(1 min/26,487 acf)= 0.0020 gr/acf

Where:

450 lbs scrap/hr = lbs/hr scrap per the application

0.10 lb PE/100 lbs scrap = limit per OAC rule 3745-17-09(B)

1 min/26,487 = baghouseacf per the application

Compliance with the annual PE limit is based on the hours the batch process can operate in a day (19.2) times 0.45 lb/hr times 365 days per year divided by 2,000 lbs/ton which = 1.58 tons per year.

If required, particulate emissions shall be determined according to test Methods 1 -5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

b. Emissions Limitation:

PE shall not exceed 0.10 pound per 100 pounds of material charged.

Applicable Compliance Method:

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

c. Emissions Limitations:

SO_2 emissions shall not exceed 0.26 lb/hr and 0.91 ton per year.

Applicable Compliance Method:

The hourly emission limitation was established based upon testing conducted on similar units and data compiled by the New Hampshire Department of Environmental Services. Stack testing conducted at Colt Refining, Inc. in November of 2009 established an SO_2 emission factor of 0.58 lb per 1,000 lbs of material charged. The lbs/hr emission rate is based on the following equation:

(0.58 lb/1,000 lbs scrap)(450 lbs/hr charge rate)= 0.26 lb/hr SO_2

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual emission limitation is demonstrated by multiplying the maximum pounds of scrap processed/yr (as identified by the permittee in the application), by the emission factor established through testing, then multiplying by .0005 ton/lb:

SO_2 = (3,153,600 lbs scrap/year)(0.58 lb/1,000 lbs scrap)(0.0005 ton/lb) = 0.91 tpy

d. Emissions Limitations:

NO_X emissions shall not exceed 2.83 lbs/hr and 9.92 tons per year.

Applicable Compliance Method(s):

The hourly emission limitation was established based upon testing conducted on similar units and data compiled by the New Hampshire Department of Environmental Services. Stack testing conducted at Colt Refining, Inc. in November of 2009 established anNOx emission factor of 6.29 lbs per 1,000 lbs of material charged. The lbs/hr emission rate is based on the following equation:

(6.29 lbs/1,000 lbs scrap)(450 lbs/hr charge rate)= 2.83 lbs/hrNOx

If required, nitrogen oxides emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual emission limitation is demonstrated by multiplying the maximum pounds of scrap processed/yr (as identified by the permittee in the application), by the emission factor established through testing, then multiplying by .0005 ton/lb:

NO_X = (3,153,600 lbs scrap/year)(6.29 lbs/1,000 lbs scrap)(0.0005 ton/lb) = 9.92 tpy

e. Emissions Limitations:

CO emissions shall not exceed 0.02 lb/hr and 0.08 ton per year.

Applicable Compliance Method(s):

The hourly emission limitation was established based upon testing conducted on similar units and data compiled by the New Hampshire Department of Environmental Services. Stack testing conducted at Colt Refining, Inc. in November of 2009 established an CO emission factor of 0.053 lb per 1,000 lbs of material charged. The lbs/hr emission rate is based on the following equation:

(0.053 lb/1,000 lbs scrap)(450 lbs/hr charge rate)= 0.02 lb/hr CO

If required, carbon monoxide emissions shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual emission limitation is demonstrated by multiplying the maximum pounds of scrap processed/yr (as identified by the permittee in the application), by the emission factor established through testing, then multiplying by .0005 ton/lb:

CO = (3,153,600 lbs scrap/year)(0.053 lb/1,000 lbs scrap)(0.0005 ton/lb) = 0.08 tpy.

f. Emissions Limitations:

VOC emissions shall not exceed 0.10 lb/hr and 0.36 ton per year.

Applicable Compliance Method(s):

The hourly emission limitation was established based upon testing conducted on similar units and data compiled by the New Hampshire Department of Environmental Services. Stack testing conducted at Colt Refining, Inc. in November of 2009 established a VOC emission factor of 0.228 lb per 1,000 lbs of material charged. The lbs/hr emission rate is based on the following equation:

(0.228 lb/1,000 lbs scrap)(450 lbs/hr charge rate)= 0.10 lb/hr VOC

If required, volatile organic compound emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual emission limitation is demonstrated by multiplying the maximum pounds of scrap processed/yr (as identified by the permittee in the application), by the emission factor established through testing, then multiplying by .0005 ton/lb:

VOC = (3,153,600 lbs scrap/year)(0.228 lb/1,000 lbs scrap)(0.0005 ton/lb) = 0.36 tpy.

g. Emissions Limitations:

Visible PE from the stack serving this emissions unit shall not exceed 10% opacity as a six-minute average.

Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method:

If required, visible PE shall be determined according to USEPA Method 9.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745 114 01, will be less than 1.0 ton per year. OAC Chapter 3745 31 requires a permittee to apply for and obtain a new or modified permit-to-install and operate 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit-to-install and operate.