



10/28/2013

Certified Mail

Benjamin Dickey  
Maverick Contracting  
7716 Depot Road Unit #1  
Lisbon, OH 44432

|    |                                    |
|----|------------------------------------|
| 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: 0250022001  
Permit Number: P0115620  
Permit Type: Initial Installation  
County: Mahoning

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](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.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](http://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, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NEDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Maverick Contracting**

|                |                      |
|----------------|----------------------|
| Facility ID:   | 0250022001           |
| Permit Number: | P0115620             |
| Permit Type:   | Initial Installation |
| Issued:        | 10/28/2013           |
| Effective:     | 10/28/2013           |
| Expiration:    | 10/21/2023           |





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Maverick Contracting

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**Final Permit-to-Install and Operate**  
Maverick Contracting  
**Permit Number:** P0115620  
**Facility ID:** 0250022001  
**Effective Date:** 10/28/2013

## Authorization

Facility ID: 0250022001  
Application Number(s): A0048952, A0049042  
Permit Number: P0115620  
Permit Description: Permit to install and operate for material handling and torch cutting operations.  
Permit Type: Initial Installation  
Permit Fee: \$400.00  
Issue Date: 10/28/2013  
Effective Date: 10/28/2013  
Expiration Date: 10/21/2023  
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

Maverick Contracting  
2415 Wilson Avenue  
Campbell, OH 44405

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

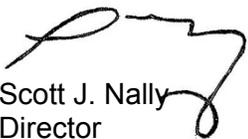
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)425-9171

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



**Final Permit-to-Install and Operate**  
Maverick Contracting  
**Permit Number:** P0115620  
**Facility ID:** 0250022001  
**Effective Date:** 10/28/2013

## Authorization (continued)

Permit Number: P0115620

Permit Description: Permit to install and operate for material handling and torch cutting operations.

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

**Emissions Unit ID:**

Company Equipment ID:

Superseded Permit Number:

General Permit Category and Type:

**F003**

Material handling

Not Applicable

**Emissions Unit ID:**

Company Equipment ID:

Superseded Permit Number:

General Permit Category and Type:

**P001**

Ferrous & Non-ferrous Metal Salvage

Not Applicable



**Final Permit-to-Install and Operate**  
Maverick Contracting  
**Permit Number:** P0115620  
**Facility ID:** 0250022001  
**Effective Date:** 10/28/2013

## **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. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. 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 taken by 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 of this permit 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 [DO/LAA] 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 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 emission 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.



**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.



**Final Permit-to-Install and Operate**  
Maverick Contracting  
**Permit Number:** P0115620  
**Facility ID:** 0250022001  
**Effective Date:** 10/28/2013

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install and Operate**

Maverick Contracting

**Permit Number:** P0115620

**Facility ID:** 0250022001

**Effective Date:** 10/28/2013

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.



**Final Permit-to-Install and Operate**  
Maverick Contracting  
**Permit Number:** P0115620  
**Facility ID:** 0250022001  
**Effective Date:** 10/28/2013

## **C. Emissions Unit Terms and Conditions**



**1. F003, Material Handling Operations**

**Operations, Property and/or Equipment Description:**

Material handling operations

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. None.

(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.       | 0.042 tons/month averaged over a 12 month rolling period of fugitive particulate matter of 10 microns or less (PM10)<br><br>See b)(2)a. |
| b. | OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 | See b)(2)b.   |

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the 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 the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

- b. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the fugitive particulate matter of 10 microns or less (PM10) from this emissions unit since the "controlled" potential to emit is less than ten tons per year.

- c. The permittee has committed to employ the following control measures for this emissions unit for purposes of ensuring compliance with the above-mentioned applicable requirements:

| Material Handling/Processing Operation | Control Measures  |
|--|---|
| loading and unloading                  | reduced drop height, wet application, as necessary*             |
| transfer and conveying                 | partial and/or total enclosures, wet application, as necessary* |

\* If at any time the moisture content of the material processed or handled is not sufficient to meet the above applicable requirements, the permittee shall employ a wet suppression control system to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- d. For each material handling operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measures is unnecessary.
- e. The permittee shall maintain the excavator in such a manner as to eliminate leakage or visible particulate emissions of fugitive dust.

c) Operational Restrictions

- (1) The maximum annual throughput for this emissions unit for handling of bulk materials is limited to 100,000 tons over a 12-month rolling period.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of material processed through this emissions unit in (a) tons per month and (b) total tons, to date, for the calendar year.
- (2) For each material processing and handling operation that is not adequately enclosed, the permittee shall perform inspections of such material processing and handling operations in accordance with the following minimum frequencies in order to determine if control measures need to be implemented:

| <u>Material Handling Operation(s)</u> | <u>Minimum Inspection Frequency</u> |
|---------------------------------------|-------------------------------------|
| All Operations                        | Daily                               |

- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from this emissions unit. The presence or absence of any visible fugitive 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 location and 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 emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

The information required in d) shall be kept separate for (i) the truck loading/unloading, (ii) the rail car loading/unloading, and (iii) the transfer points and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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 records of the following information:
  - a. the date and reason any required inspection was not performed;



- b. the date of each inspection where it was determined by the permittee that it was necessary to implement control measures:
  - c. the dates and control measures that were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented.
- (5) The above-mentioned inspections shall be performed during representative, normal operating conditions.
- (6) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- e) **Reporting Requirements**
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
  - (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements in term numbers d)(1), (2), (3), and (4) above:
    - a. the total material throughput, in tons, for the previous calendar year.
    - b. all days during which any visible emissions of fugitive dust were observed from this emissions unit; and
    - c. any corrective actions taken to minimize or eliminate the visible emissions; and
    - d. each day during which an inspection was not performed by the required frequency; and
    - e. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.
- 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:

0.042 tons/month averaged over a 12 month rolling period of fugitive particulate matter of 10 microns or less (PM10)

Applicable Compliance Method:

Compliance shall be demonstrated by summing the calculated hourly emission rate for each conveying or handling or loading operation, these emission factors are specified in U.S. EPA reference document AP-42, 13.2.4 (11/2006). See the following calculations:

Material Handling (PM10)

AP-42 Equation 13.2.4

Where:  $E = (k)(0.0032)(U/5)^{1.3}/(M/2)^{1.4}$

$E = 0.35 (0.0032) (10/5)^{1.3} / (0.7/2)^{1.4} = 0.012 \text{ lbs PM10/ton transferred}$

k = 0.35 for PM10 particles

U = Mean Wind Speed (10 MPH)

M = Moisture Content (0.7% avg.)

Material Loading/Unloading:

0.012 lbs PM10/ton x 100,000 tons/year = 1200 lbs PM10/year

1200 PM10/year / 2000 lbs/ton = 0.5 tons PM10/year

0.5 tons PM10/year / 12 months = 0.042 tons PM10/month averaged over a 12 month rolling period

g) Miscellaneous Requirements

(1) None.



**2. P001, Ferrous & Non-ferrous Metal Torch and Sheer Cutting Operations**

**Operations, Property and/or Equipment Description:**

Torch cutting operations and shear cutting operations

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. None.

(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 3745-31-03(A)(3), as effective 11/30/01       | 0.042 tons/month averaged over a 12 month rolling period of fugitive particulate matter of 10 microns or less (PM10)<br>See b)(2)b. |
| b. | OAC rule 3745-31-05(A)(3)(a)(ii) as effective 12/01/06 | See b)(2)c.   |

(1) Additional Terms and Conditions

a. The permittee shall employ best available control practices when cutting torches are being used to minimize resulting visible particulate emissions. Such practices shall include, but not be limited to, the following items: cutting metal that is clean of any oil(s) or other combustible fluids, the minimization of flame impingement with the ground, and the use of the appropriately sized cutting torch(es).

Should current work practices prove insufficient for controlling fugitive particulate emissions, Ohio EPA may require additional work practices to be employed.



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, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. 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 revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

c. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the fugitive particulate matter of 10 microns or less (PM10) from this emissions unit since the "controlled" potential to emit is less than ten tons per year.

c) Operational Restrictions

- (1) The permittee is prohibited from using oxygen lances.
- (2) The permittee shall have fire extinguishers of the appropriate type located near any cutting station(s) and they shall be employed promptly to extinguish any accidental fires caused by cutting operations.
- (3) In accordance with OAC rule 3745-19-03, any open burning of solid waste at this facility/location is prohibited. Any accidental fires that may be caused by the torch cutting operations shall be reported.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain a daily log of the metal cutting operations including the number of operational cutting stations, the amount (in tons) and type of metal cut and the number of hours each station operated per day at this facility.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from this emissions unit. The presence or absence of any visible fugitive 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 location and 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 emissions 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.

- (3) The permittee may, upon receipt of written approval from Ohio EPA's Northeast District Office, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) The permittee shall report any and all accidental fires that may be caused by the torch cutting operations at this facility. A written report shall be submitted to the Ohio EPA, Northeast District Office and the Mahoning-Trumbull Air Pollution Control Agency no later than 15 days following the incident.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:
  - a. all days during which any visible emissions of fugitive dust were observed from this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible emissions;
  - c. any time an oxygen lance is used.



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. Emission Limitation

0.042 tons/month averaged over a 12 month rolling period of fugitive particulate matter of 10 microns or less (PM10)

Applicable Compliance Method

Compliance with the above hourly particulate emission limitation shall be determined using the following equation, based on the emission factor for uncontrolled metal scarfing in AP-42, "Compilation of Air Pollutant Emission Factors", Section 12.5.1 (Mini-mills), Fifth Edition, dated 4/09, Table 12.5.1-1:

$$E = [(0.032 \text{ lb/ton metal processed}) \times (\text{tons metal processed/day})] / (\text{operating hours/day})$$

Where:

E = particulate emission rate (in lbs/hr);

Tons metal processed/day = the amount of metal processed with the cutting torches per day, as recorded in d)(1);

Operating hours/day = the number of hours the torches were operated per day, as recorded in d)(1).

Compliance with the above annual particulate emission limitation shall be determined by multiplying the hourly allowable emission rate by 8,760 hours and dividing by 2,000 lbs/ton.

g) Miscellaneous Requirements

- (1) The permittee shall submit the appropriate permit-to-install and operate application to the Ohio EPA, prior to the installation of any additional torch cutting stations at this facility.