



12/13/2013

Certified Mail

MICHAEL CONNOLLY
Tube City IMS - Mansfield
1155 BUSINESS CTR DR., STE 200
HORSHAM, PA 19044-3454

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: 0370010294
Permit Number: P0115794
Permit Type: Renewal
County: Richland

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/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 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, Northwest District Office at (419)352-8461 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-NWDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Tube City IMS - Mansfield**

Facility ID:	0370010294
Permit Number:	P0115794
Permit Type:	Renewal
Issued:	12/13/2013
Effective:	12/13/2013
Expiration:	12/13/2023



Division of Air Pollution Control
Permit-to-Install and Operate
for
Tube City IMS - Mansfield

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Final Permit-to-Install and Operate
Tube City IMS - Mansfield
Permit Number: P0115794
Facility ID: 0370010294
Effective Date: 12/13/2013

Authorization

Facility ID: 0370010294
Application Number(s): A0049335
Permit Number: P0115794
Permit Description: This is a renewal PTIO application for various scrap yard operations including paved and unpaved roadways (F001), storage piles (F002), load-in charging cells (F003-F005) and lime receiving and handling operations (P901).
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 12/13/2013
Effective Date: 12/13/2013
Expiration Date: 12/13/2023
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

Tube City IMS - Mansfield
1344 BOWMAN STREET
MANSFIELD, OH 44903

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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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: P0115794
Permit Description: This is a renewal PTIO application for various scrap yard operations including paved and unpaved roadways (F001), storage piles (F002), load-in charging cells (F003-F005) and lime receiving and handling operations (P901).

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

- | | |
|-----------------------------------|----------------|
| Emissions Unit ID: | F001 |
| Company Equipment ID: | F001 |
| Superseded Permit Number: | 03-1416 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | F002 |
| Company Equipment ID: | F002 |
| Superseded Permit Number: | 03-13959 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P901 |
| Company Equipment ID: | P901 |
| Superseded Permit Number: | 03-16297 |
| General Permit Category and Type: | Not Applicable |

Group Name: load charging cells

Emissions Unit ID:	F003
Company Equipment ID:	F003
Superseded Permit Number:	03-13959
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F004
Company Equipment ID:	F004
Superseded Permit Number:	03-13959
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F005
Company Equipment ID:	F005
Superseded Permit Number:	03-13959
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Tube City IMS - Mansfield
Permit Number: P0115794
Facility ID: 0370010294
Effective Date: 12/13/2013

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
Tube City IMS - Mansfield
Permit Number: P0115794
Facility ID: 0370010294
Effective Date: 12/13/2013

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

Tube City IMS - Mansfield

Permit Number: P0115794

Facility ID: 0370010294

Effective Date: 12/13/2013

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
Tube City IMS - Mansfield
Permit Number: P0115794
Facility ID: 0370010294
Effective Date: 12/13/2013

C. Emissions Unit Terms and Conditions



1. F001, F001

Operations, Property and/or Equipment Description:

Paved and Unpaved Roadways

- 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)	42.01 tons fugitive particulate emissions (PE)/year <u>Paved Roadways and Parking Areas</u> No visible fugitive particulate emissions (PE) except for a period of time not to exceed one minute during any 60-minute observation period See b)(2)a. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [See b)(2)c. and b)(2)e. through b)(2)i.] <u>Unpaved Roadways and Parking Areas</u> No visible fugitive PE except for a period of time not to exceed three-minutes



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		during any 60-minute observation period See b)(2)b. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [See b)(2)d. through b)(2)i.]
b.	OAC rule 3745-17-07(B)(1)	See b)(2)j.
c.	OAC rule 3745-17-08(B)(1)	See b)(2)j.

(2) Additional Terms and Conditions

- a. The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:
 - paved roadways: all paved road segments
 - paved parking areas: all paved parking areas.
- b. The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:
 - unpaved roadways: all unpaved road segments
 - unpaved parking areas: all unpaved parking areas.
- c. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the paved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the unpaved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of



this permit. Implementation of the control measures shall not be necessary for paved and unpaved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

- f. Any unpaved roadway or parking area, which during the term of this permit is paved or takes on the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- g. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- h. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- i. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
- j. The emissions limitations and control measures specified by OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B) are less stringent than the emissions limitations and control measure requirements established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all	once per day of operation



unpaved roadways and parking areas minimum inspection frequency

all

once per day of operation

- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such events have ended, except if the next required inspection is within one week.
- (3) The permittee shall maintain records of the following information:
- a. The date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. The dates the control measures were implemented; and
 - d. On a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(3)d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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 additionally identify the following information in the annual PER in accordance with the monitoring requirements in term number d)(3) above:
- a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and



- b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or instance(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that all inspections were performed by the required frequency, and control measure(s) were properly 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. Emission Limitation:

42.01 tons fugitive PE/year

Applicable Compliance Method:

Compliance with the fugitive PE emission limitation shall be determined by using the emission factor equation in Section 13.2.1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 1/11) for paved roadways and the emission factor equation in Section 13.2.2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for unpaved roadways. Should further updates in AP-42 occur, the most current equations for unpaved and paved roadways shall be used. These emission limitations were based on a maximum of 13,352 vehicle miles traveled per year on paved roadways and a maximum of 27,212 vehicle miles traveled per year on unpaved roadways, then applying a 50% control efficiency for paved roadways and a 70% control efficiency for unpaved roadways and dividing by 2000 lbs/ton.

Therefore, provided compliance is shown with the requirement of this permit to apply best available control measures, compliance with the annual limitations shall also be demonstrated.

- b. Emission Limitation:

No visible fugitive PE except for a period of time not to exceed one minute during any 60-minute observation period for paved roadways and parking areas

Applicable Compliance Method:

Compliance with the visible fugitive PE emission limitation specified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.



c. Emission Limitation:

No visible fugitive PE except for a period of time not to exceed three minutes during any 60-minute observation period for unpaved roadways and parking areas

Applicable Compliance Method:

Compliance with the visible fugitive PE emission limitation specified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) None.



2. F002, F002

Operations, Property and/or Equipment Description:

Storage Piles

- 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)	3.49 tons fugitive particulate emissions (PE)/year No visible PE from load-in or load-out except for a period of time not to exceed thirteen minutes during any 60-minute observation period No visible PE from wind erosion except for a period of time not to exceed thirteen minutes during any 60-minute observation period Best available control measures that are sufficient enough to minimize or eliminate visible emissions of fugitive dust [see b)(2)b. through b)(2)e.]
b.	OAC rule 3745-17-07(B)	See b)(2)f.
c.	OAC rule 3745-17-08(B)	See b)(2)f.



(2) Additional Terms and Conditions

- a. The storage piles that are covered by this permit and subject to the above-mentioned requirements are listed below:

storage pile identification:

all storage piles

- b. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles and for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee maintains that the materials have inherent characteristics that result in an amount of fugitive particulate emissions which comply with all applicable requirements without applying control. If at any time fugitive particulate emissions generated do not meet the above applicable requirements, the permittee shall employ reasonably available control measures to ensure compliance.

The operator shall avoid dragging any front-end loader bucket along the ground. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- c. Reasonably available control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- d. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05(A)(3)(a).
- f. The emissions limitations and control measures specified by these rules are less stringent than the emissions limitations and control measure requirements established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

storage pile identification: minimum load-in inspection frequency:

all storage piles weekly

- (2) Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

storage pile identification: minimum load-out inspection frequency:

all storage piles weekly

- (3) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

storage pile identification: minimum wind erosion inspection frequency:

all storage piles weekly

- (4) No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

- (5) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

- (6) The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days



where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in d)(6)d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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 additionally identify the following information in the annual PER in accordance with the monitoring requirements in term number d)(6) above:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or instance(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that all inspections were performed by the required frequency, and control measure(s) were properly 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. Emission Limitation:
3.49 tons fugitive PE/year
Applicable Compliance Method:
The emission rate was determined as follows:
 - i. Load-in – The PE emission limitation was established by multiplying the maximum load-in rate of 1,400,000 tons per year by the calculated



emission factor from AP-42 section 13.2.4 (11/06) [0.0034 lb/ton], dividing by 2000 lbs/ton. (2.40 tons PE/yr)

- ii. Load-out – The PE emission limitation was established by multiplying the maximum load-out rate of 530,000 tons per year (balance of materials is accounted for in load charging cells) by the calculated emission factor from AP-42 section 13.2.4 (11/06) [0.0034 lb/ton], dividing by 2000 lbs/ton. (0.91 tons PE/yr)
- iii. Wind Erosion – The PE emission limitation was established by multiplying the maximum acres of 0.64 by the appropriate emission factor from AP-42 section 13.2.4 (11/06) [1.53 lb PE/day/acre], by a maximum operating schedule of 365 days per year, and dividing by 2000 lbs/ton. (0.18 ton PE/yr)

Therefore, provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the annual emission limitations shall also be demonstrated.

b. Emission Limitation:

No visible PE from load-in or load-out except for a period of time not to exceed thirteen minutes during any 60-minute observation period

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

c. Emission Limitation:

No visible PE from wind erosion except for a period of time not to exceed thirteen minutes during any 60-minute observation period

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) None.



3. P901, P901

Operations, Property and/or Equipment Description:

Lime Receiving, Handling, including Dolomitic Lime: Storage Building (with Baghouse), Bucket Charge Building (with Baghouse), Dol. Lime Silo (with Baghouse), with Conveyors

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)	See b)(2)a. <u>Lime Receiving/Storage Building Stack</u> 0.01 grain/dry standard cubic foot particulate emissions (gr PE/dscf), 4.8 tons PE/year Visible PE shall not exceed 0% opacity as a six-minute average from lime receiving/storage building stack <u>Charge Bucket Building Stack</u> 0.01 gr PE/dscf, 22.5 tons PE/year Visible PE shall not exceed 0% opacity as a six-minute average from charge bucket building stack



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<u>Lime Storage Silo Stack</u> 0.01 gr PE/dscf, 0.2 ton PE/year Visible PE shall not exceed 0% opacity as a six-minute average from lime storage silo stack <u>Fugitive Emissions</u> 3.4 tons PE/year
b.	OAC rule 3745-17-07(B)	Visible fugitive particulate emissions from the lime receiving/storage building and the charge bucket building shall not exceed 20% opacity as a 3 minute average
c.	OAC rule 3745-17-08(B)	See b)(2)b.
d.	OAC rule 3745-17-07(A)	See b)(2)c.
e.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

- a. "Best Available Technology" (BAT) control requirements for this emissions unit has been determined to be the following:
 - i. Use of baghouse for PE control on the lime receiving/storage building with a maximum outlet concentration of 0.01 gr PE/dscf of exhaust gas;
 - ii. Use of baghouse for PE control on the bucket charge building with a maximum outlet concentration of 0.01 gr PE/dscf of exhaust gas;
 - iii. Use of baghouse for PE control on the lime storage silo with an outlet concentration of 0.01 gr PE/dscf of exhaust gas;
 - iv. Use of enclosure vented to baghouse (lime receiving/storage building baghouse) for lime conveyor [see b)(2)a.i. for baghouse requirements];
 - v. The following particulate emission operations shall be contained within building enclosures:
 - (a) lime unloading
 - (b) lime transfer to grizzly feeder
 - (c) enclosed conveyor drop-out to charge bucket.
- b. The requirements of this rule are equivalent to or less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).



- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks 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. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
 - (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive emissions from the egress points (i.e. building windows, doors, roof monitors, etc.) 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 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 emission incident; and,
 - e. any corrective actions taken to eliminate the abnormal visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(2)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission 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.



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 PER in accordance with the monitoring requirements in d)(1) and d)(2) above:
 - a. all days during which any visible particulate emissions were observed from the stacks serving this emissions unit;
 - b. any corrective actions taken to eliminate the visible stack particulate emissions;
 - c. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - d. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

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:
0.01 gr PE/dscf, 4.8 tons PE/year from the lime receiving/storage building stack

Applicable Compliance Method:

The gr/dscf limitation was established in accordance with the baghouse manufacturer's guaranteed outlet concentration. If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

The annual emission limitation was established by the multiplying the maximum outlet concentration of 0.01 gr/dscf, a maximum baghouse air flow of 12,772 dscfm, a conversion factor of 60 minutes/hr, a conversion factor of 1.0 lbs PE/7000 grains, a maximum operating schedule of 8760 hrs/yr, and a conversion factor of 2000 lbs/ton. Therefore provided compliance is shown with the gr/dscf limitation, compliance with the annual limitation shall also be demonstrated.
 - b. Emission Limitation:
0.01 gr PE/dscf, 22.5 tons PE/year from the charge bucket building stack



Applicable Compliance Method:

The gr/dscf limitation was established in accordance with the baghouse manufacturer's guaranteed outlet concentration. If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

The annual emission limitation was established by the multiplying the maximum outlet concentration of 0.01 gr/dscf, a maximum baghouse air flow of 60,000 dscfm, a conversion factor of 60 minutes/hr, a conversion factor of 1.0 lbs PE/7000 grains, a maximum operating schedule of 8760 hrs/yr, and a conversion factor of 2000 lbs/ton. Therefore provided compliance is shown with the gr/dscf limitation, compliance with the annual limitation shall also be demonstrated.

c. Emission Limitation:

0.01 gr PE/dscf, 0.2 ton PE/year from the lime storage silo stack

Applicable Compliance Method:

The gr/dscf limitation was established in accordance with the baghouse manufacturer's guaranteed outlet concentration. If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

The annual emission limitation was established by the multiplying the maximum outlet concentration of 0.01 gr/dscf, a maximum baghouse air flow of 624 dscfm, a conversion factor of 60 minutes/hr, a conversion factor of 1.0 lbs PE/7000 grains, a maximum operating schedule of 8760 hrs/yr, and a conversion factor of 2000 lbs/ton. Therefore provided compliance is shown with the gr/dscf limitation, compliance with the annual limitation shall also be demonstrated.

d. Emission Limitation:

3.4 tons fugitive PE/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation by employing the following table for calculating fugitive emissions:

Emission Point	Equipment Type	Capacity (tons/hour)	Emission Factor*	Capture Efficiencies
lime unloading into building	transfer point	2.4	1.5 lbs/ton (uncontrolled)	partial enclosure—60% Baghouse— 80%
lime transfer to grizzly feeder	transfer point	2.4	2.2 lbs/ton (uncontrolled)	partial enclosure—60%



Emission Point	Equipment Type	Capacity (tons/hour)	Emission Factor*	Capture Efficiencies
				Baghouse– 80%
grizzly feeder to enclosed conveyor	transfer point	2.4	0.022 lbs/ton (controlled)	accounted for in the emission factor
lime transfer to enclosed conveyor	transfer point	1.2	0.022 lbs/ton (controlled)	accounted for in the emission factor

*The emission factors used are from AP-42 Table 11.17-4 (February 1998)

e. Emission Limitation:

Visible PE shall not exceed 0%opacity as a six-minute average from lime receiving/storage building stack

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

f. Emission Limitation:

Visible PE shall not exceed 0%opacity as a six-minute average from charge bucket building stack

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

g. Emission Limitation:

Visible PE shall not exceed 0%opacity as a six-minute average from lime storage silo stack

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with Method 9 of 40 CFR, Part 60, Appendix A.



Final Permit-to-Install and Operate

Tube City IMS - Mansfield

Permit Number: P0115794

Facility ID: 0370010294

Effective Date: 12/13/2013

h. Emission Limitation:

Visible fugitive particulate emissions from the limereceiving/storage building andthecharge bucket building shall notexceed 20% opacity as a 3 minuteaverage

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with OAC rule 3745-17-03(B).

g) Miscellaneous Requirements

(1) None.



4. Emissions Unit Group -load charging cells: F003,F004,F005,

EU ID	Operations, Property and/or Equipment Description
F003	Load Charging Cell No 1.
F004	Load Charging Cell No 2.
F005	Load Charging Cell No 5.

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)	7.02 tons fugitive particulate emissions (PE)/year, from each emissions unit individually. See b)(2)e.
b.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed 20% opacity, as a three-minute average.
c.	OAC rule 3745-17-08(B)	Reasonable available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [see b)(2)b. and b)(2)c.]



(2) Additional Terms and Conditions

- a. The material handling operations that are covered by this permit and subject to the above-mentioned requirements are listed below are loading of steel and ferro alloy materials into a charging bucket and charge pot via an alloy handling system and crane.
- b. The permittee shall employ reasonably available control measures for the above-identified material handling operation for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee maintains that the materials have inherent characteristics that result in an amount of fugitive particulate emissions which comply with all applicable requirements without applying control. If at any time fugitive particulate emissions generated do not meet the above applicable requirements, the permittee shall employ reasonably available control measures to ensure compliance.
- c. 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 are unnecessary.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B).
- e. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-08(B) and OAC rule 3745-17-08(B).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) 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 Operations</u>	<u>Minimum Inspection Frequency</u>
load-out system to charge pots	weekly
transfer system to charge buckets	weekly



- (2) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for material handling operations. The inspections shall be performed during representative, normal material handling operation conditions.
- (3) 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 the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented.

The information in d)(3)d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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 additionally identify the following information in the annual PER in accordance with the monitoring requirements in term number d)(3) above:
 - a. each day during which an inspection of the material processing and handling operations was not performed by the required frequency; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or instance(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that all inspections were performed by the required frequency, and control measure(s) were properly 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. Emission Limitation:

7.02 tons fugitive PE/year

Applicable Compliance Method:

The emission rate was determined as follows:

- i. Load-out to charge bucket – The PE emission limitation was established by multiplying the maximum load-in rate of 1,400,000 tons per year by the calculated emission factor from AP-42 section 13.2.4 (11/06) [0.0034 lb/ton], dividing by 2000 lbs/ton. (1.42 tons PE/yr)
- ii. Transfer to charge bucket – The PE emission limitation was established by multiplying the maximum load-out rate of 860,000 tons per year by the calculated emission factor from AP-42 section 13.2.4 (11/06) [0.0260lb/ton] multiplied by 0.5 (as 50% of the material handled accounts for these emissions), dividing by 2000 lbs/ton. (5.59 tons PE/yr)

Therefore, provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the annual emission limitations shall also be demonstrated.

b. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20% opacity, as a three-minute average

Applicable Compliance Method:

If required, compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.