



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
CUYAHOGA COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 13-04594

Fac ID: 1318006057

DATE: 4/13/2006

WMG, Incorporated
Gordon Jermstad
3915 East 91st Street
Cleveland, OH 44105

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CLAA



**Permit To Install
Terms and Conditions**

**Issue Date: 4/13/2006
Effective Date: 4/13/2006**

FINAL PERMIT TO INSTALL 13-04594

Application Number: 13-04594
Facility ID: 1318006057
Permit Fee: **\$1450**
Name of Facility: WMG, Incorporated
Person to Contact: Gordon Jermstad
Address: 3915 East 91st Street
Cleveland, OH 44105

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4900 Woodland Avenue
Cleveland, Ohio**

Description of proposed emissions unit(s):
Scrap metal shredder, paved roads, and material handling -- P001, F001, F002.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	43.81
PM ₁₀	17.14

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F001 - Paved roadways and parking areas	OAC rule 3745-31-05 (A)(3)	PM, 33.16 TPY PM ₁₀ 6.49 TPY Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. (See A.2.a through A.2.f below.) No visible emissions of fugitive dust except for 1 minute during any 60-minute period.
	OAC rule 3745-17-07 (B)(4)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-17-08 (B), (B)(8), (B)(9)	The control measures specified by this rule are equivalent to the control measures established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a** All paved roadways and parking areas that are covered by this permit are subject to the above mentioned requirements.
- 2.b** 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. The permittee shall treat the paved roadways and parking areas with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c** 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 a paved 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. Implementation of any control measures may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.d** 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.
- 2.e** 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.
- 2.f** 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.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform daily inspections of all the roadways and parking areas.
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 event(s) has (have) ended, except if the next required inspection is within one week.
3. The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality, modify the above mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above mentioned applicable requirements.
4. 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;
 - 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; and
 - e. the annual vehicle miles traveled for paved roadways.

The information required in 4.d shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following

occurrences:

- 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.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

1.a Visible Emission Limit:

There shall be no visible emissions of fugitive dust except for a period of time not to exceed one minute during any sixty-minute observation period for paved roadways and parking areas.

Applicable Compliance Method:

Compliance with the visible emission limitation for the paved roadways and parking areas identified 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," as such Appendix existed on July 1, 1996 and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

1.b Emission Limitation:

PM, 33.16 TPY

Paved roads and parking areas

PM₁₀, 6.49 TPY

Applicable Compliance Method:

The TPY emission limitation shall be based on Paved roads and parking areas calculations using the equation 1 for paved roadways and parking areas taken from U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, section 13.2.1 (1/95) to establish the emission factor in lb/VMT. The calculated emission factors are 11.14 lbs/VMT for PM emissions and 2.17 lbs/VMT for PM₁₀ emissions. This emission factor is multiplied by the

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annual vehicle miles traveled (VMT) and (1-.80) to account for the 80% wet sweeping emission control efficiency then divide by 2000 lbs/ton.

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>		<u>Applicable Rules/Requirements</u>
P001 - 200 TPH Model 98 x 104 Scrap Metal Shredder with electric motor	downstream separation system with 50 miscellaneous drop points	OAC rule 3745-31-05(A)(3)
		OAC rule 3745-17-07 (B)(1)
		OAC rule 3745-17-08 (B)

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OAC rule 3745-31-05(A)(3)

Applicable Emissions
 Limitations/Control Measures

PM/PM₁₀ - 0.51 lb/hour and
 2.23 tons/year emissions

Visible emissions of fugitive dust shall not exceed ten percent opacity, as a six-minute average.

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.a through A.2.d below).

OAC rule 3745-17-07 (B)(1)

The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-17-08 (B)

The control measures specified by this rule are equivalent to the control measures established pursuant to OAC rule 3745-31-05(A)(3).

PM/PM₁₀ - 1.88 lbs/hour and
 8.42 tons/year emissions

Visible emissions of fugitive dust shall not exceed ten percent opacity, as a six-minute average.

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.a through A.2.d below).

The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The control measures specified by this rule are equivalent to the control measures established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The material handling operations that are covered by this permit and subject to the above mentioned requirements are listed below:

- Shredder/Hammermill
- Separation conveyors
- Fluff separation
- Conveyor to stockpile

2.b The permittee shall employ best available control measures for the above-identified material handling operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measures to ensure compliance:

<u>Material Handling Operation</u>	<u>Control Measure</u>
Shredder/Hammermill	Water injection system
Separation conveyors	Maintain moisture content
Fluff separation	Cyclone "Closed Loop" Separator
System	
Conveyor to stockpile	Maintain moisture content

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.c For each phase of the shredding operation that is not adequately enclosed, the control measure(s) 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 measure(s) is (are) necessary to ensure compliance with the applicable requirement. Any required implementation of the control measure(s) shall continue during the operation of the shredder until further observation confirms that use of the control measure(s) is unnecessary.

2.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 rue 3745-31-05(A)(3).

B. Operational Restrictions

1. The permittee shall remove all mercury switches prior to processing.
2. The permittee shall drain/remove all combustible fluids and batteries prior to processing.

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>Material Handling Operation</u>	<u>Minimum Inspection Frequency</u>
Shredder/Hammermill	Daily
Separation conveyors	Daily
Fluff separation	Daily
Conveyor to stockpile	Daily

2. The above mentioned inspections shall be performed during representative, normal operating conditions.
3. The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality, modify the above mentioned inspection frequencies if operating experience indicated that less frequent inspections would be sufficient to ensure compliance with the applicable requirements.
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 the control measure(s);
 - c. the dates the control measure(s) was (were) implemented; and
 - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in 4.d shall be kept separately for each material handling operation, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

5. The permittee shall document and record the processing of any materials (including whole vehicles) through the hammermill where the following has not been removed:
 - a. any mercury-containing devices; and
 - b. any combustible liquids or battery.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation reports to the Cleveland Division of Air Quality that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency; and
 - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.
 - c. the list of materials that were not removed from the vehicles as required:
 - i. any mercury-containing devices; and
 - ii. any combustible liquid or battery.

These deviation (excursion) reports shall be submitted in accordance with the general terms and conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
Visible emissions of fugitive dust shall not exceed ten percent opacity, as a six-minute average

Applicable Compliance Method:

Compliance with the above visible emission limitation shall be determined using Method 9 of 40 CFR, Part 60, Appendix A.

- b. Emission Limitations:
0.51 lb/hour emissions from the shredding operation

Applicable Compliance Method

Compliance with the hourly PM/PM₁₀ emission limitation shall be determined using the emission factor from a stack test at a similar source, found in the Institute of Scrap Recycling Industries (ISRI) Title V Applicability Workbook, from Table D-10.F. The emission factor from the stack test, is 0.00343 pounds PM/PM₁₀ per ton for shredding (adjusted by ratio for 200 ton/hr). This emission factor shall be multiplied by the maximum process weight rate, in tons/hour and multiplied by (1-.25) to account for the 25% watering emission control efficiency.

- c. Emission Limitation:
2.23 tons/year of PM/PM₁₀

The tons/year limitations were developed by multiplying the pound/hour by 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitation.

- d. Emission Limitation:
1.88 lbs/hour from the downstream separation system

Applicable Compliance Method

Compliance with the hourly PE/PM₁₀ emission limitation shall be determined using the emission factors for Conveyor Transfer Point Emission Factors (Crushed Stone Processing), Table D-9, from the Institute of Scrap Recycling Industries (ISRI) Title V Applicability Workbook. The emission factor from the ISRI workbook, is 0.00048 lb PM/ PM₁₀ per ton for conveyor transfer points for wet operation. This emission factor shall be multiplied by the maximum process weight rate, in tons/hour, for each transfer point and summed.

- e. Emission Limitation:
8.42 tons/year of PM/PM₁₀ from the downstream separation system

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The tons/year limitations were developed by multiplying the pound/hour by 8760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitation.

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F. Miscellaneous Requirements

None.