



State of Ohio Environmental Protection Agency

P003
Foot

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Mahoning County
Application No: 02-1497

CERTIFIED MAIL

September 10, 1997

ADD IRON CORPORATION
DONALD GORDON
4 RESERVOIR CIRCLE SUITE 105
BALTIMORE, MD 21208

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 with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's 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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
NORTHEAST DISTRICT OFFICE, DAPC

RECEIVED

SEP 16 1997

OHIO EPA NEDO

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director



Permit to Install Terms and Conditions

Application No. 02-1497
APS Premise No. 0250000948
Permit Fee: \$800.00

Name of Facility: ADD IRON CORPORATION

Person to Contact: DONALD GORDON

Address: 4 RESERVOIR CIRCLE SUITE 105
BALTIMORE, MD 21208

Location of proposed source(s): 730 MILEY ROAD
BEAVER TOWNSHIP, OHIO

Description of proposed source(s):
FERROUS SULFATE PROCESSING, MATERIAL HANDLING, ROADWAYS AND
PARKING AREAS.

Date of Issuance: September 10, 1997

Effective Date: September 10, 1997

The above named entity is hereby granted a permit to install for the above described source(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 source(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 source(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

RECEIVED
SEP 16 1997
OHIO EPA NEDO

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 and regulations.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for ADD IRON CORPORATION located in Mahoning County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P003	Modification to ferrous sulfate material handling ops.	Use of a fabric filter enclosed on a hooded process units and material handling; Visible emissions shall not exceed 5% opacity on a 6-minute average	3745-31-05 3745-17-07 3745-17-11	PM: 0.02 gr/dscf, 1.37 lbs/hr, visible emissions shall not exceed 5% opacity on a 6 minute average.
F001	Roadways and parking areas	Visible emissions from paved roadways and parking areas are not to exceed 1 minute during any 60-minute period; the roadways and parking areas shall be swept on an as needed basis.	3745-31-05 3745-17-07 3745-17-08	PM: 4.1 TPY visible emissions from paved roadways and parking areas are not to exceed 1 minute during any 60-minute period.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	6.0 (P003)
PM	<u>4.1 (F001)</u>
Total PM=10.1 (P003 & F001)	

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to OEPA Northeast District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 44087.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Northeast District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 44087.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Introduction

These additional terms and conditions are written specifically for emissions unit P003 and F001. The PTI for emissions unit P003 is a modification to a current PTI (02-4204) for the materials handling operations.

B. Operational Restrictions

- ✓ 1. The pressure drop across the baghouse shall be maintained within the range of 2.0-7.0 inches of water while the emissions unit is in operation.
- ✓ 2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
- ✓ 3. The product screener, elevators, screw conveyors, belt conveyors, product storage bins, bagging station, bulk load out stations and all other material handling operations (P003) shall be adequately enclosed and hooded to minimize or eliminate visible particulate emissions of fugitive dust.
- ✓ 4. The air pollution control systems shall be operated with sufficient volumetric flow rate to minimize or eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.
- ✓ 5. The permittee shall sweep the paved roadways and parking areas to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic. The following equipment shall be used to sweep the roadways and parking areas: manual broom sweeping. The paved surfaces shall be swept, on an as needed basis. The permittee shall not be required to sweep during wet conditions when there is sufficient moisture to prevent visible emissions of fugitive dust.

✓ Any material carried off of the permittee's property and deposited onto public streets by vehicular traffic or by erosion by water, etc., shall be promptly removed and disposed of properly to minimize or prevent resuspension.

✓ A maximum speed limit of 10 miles per hour shall be posted and enforced on the property.

✓ Open bodied vehicles transporting materials likely to become airborne shall be covered at all times.

6. This plant shall be used to process ferrous sulfate. Prior to processing any other materials, Add-Iron Corp. shall notify the Ohio EPA in writing. Processing of other material(s) may require an additional Ohio EPA permit to install.

C. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

D. Emissions Limits

1. The emissions of particulate matter from the fabric filter No. 3 controlling the material handling equipment (P003) shall not exceed 0.02 grain per dry standard cubic foot of exhaust gases and 1.37 pounds per hour.

2. The opacity of particulate matter from the material handling fabric filter shall not exceed 5 percent on a six minute average.

3. There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed 1 minute during any 60-minute observation period.

E. Recordkeeping

1. The permittee shall maintain records which include the following information for the paved roadways and parking areas:

a. the date the paved surfaces were swept;

b. the portions of the paved surfaces that were swept; and,

c. the name of the equipment operator responsible for the sweeping.