



12/2/2014

Ms. Terri Brunson
Arco Recycling, Inc.
520 South Main Street
Suite 2519
Akron, OH 44311

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318188703
Permit Number: P0117868
Permit Type: Initial Installation
County: Cuyahoga

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

Certified Mail

Table with 2 columns: No, and various permit conditions like TOXIC REVIEW, SYNTHETIC MINOR TO AVOID MAJOR NSR, CEMS, MACT/GACT, NSPS, NESHAPS, NETTING, MODELING SUBMITTED, SYNTHETIC MINOR TO AVOID TITLE V, FEDERALLY ENFORCABLE PTIO (FEPTIO), SYNTHETIC MINOR TO AVOID MAJOR GHG.

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

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

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

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

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Erica R. Engel-Ishida, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: CDAQ



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Arco Recycling, Inc.**

Facility ID:	1318188703
Permit Number:	P0117868
Permit Type:	Initial Installation
Issued:	12/2/2014
Effective:	12/2/2014
Expiration:	7/31/2024





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

for  
Arco Recycling, Inc.

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**Final Permit-to-Install and Operate**  
Arco Recycling, Inc.  
**Permit Number:** P0117868  
**Facility ID:** 1318188703  
**Effective Date:** 12/2/2014

## Authorization

Facility ID: 1318188703  
Application Number(s): A0052008  
Permit Number: P0117868  
Permit Description: Initial installation of F003, a construction and demolition debris sorting line. The line consists of screening, conveying, magnetic, hand picking, and sorting of demolition debris. The sorting line is controlled by automatic spray bars and watering at drop points. The sorting line is powered by an exempt 40-hp diesel engine.  
Permit Type: Initial Installation  
Permit Fee: \$200.00  
Issue Date: 12/2/2014  
Effective Date: 12/2/2014  
Expiration Date: 7/31/2024  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Arco Recycling, Inc.  
1705 Noble Road  
East Cleveland, OH 44112

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

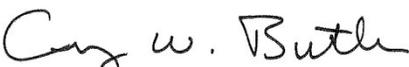
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality  
2nd Floor  
75 Erieview Plaza  
Cleveland, OH 44114  
(216)664-2297

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

  
Craig W. Butler  
Director



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

Arco Recycling, Inc.

**Permit Number:** P0117868

**Facility ID:** 1318188703

**Effective Date:** 12/2/2014

## Authorization (continued)

Permit Number: P0117868

Permit Description: Initial installation of F003, a construction and demolition debris sorting line. The line consists of screening, conveying, magnetic, hand picking, and sorting of demolition debris. The sorting line is controlled by automatic spray bars and watering at drop points. The sorting line is powered by an exempt 40-hp diesel engine.

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

<b>Emissions Unit ID:</b>	<b>F003</b>
Company Equipment ID:	F003
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



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

Arco Recycling, Inc.

**Permit Number:** P0117868

**Facility ID:** 1318188703

**Effective Date:** 12/2/2014

## **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**

Arco Recycling, Inc.

**Permit Number:** P0117868

**Facility ID:** 1318188703

**Effective Date:** 12/2/2014

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



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

Arco Recycling, Inc.

**Permit Number:** P0117868

**Facility ID:** 1318188703

**Effective Date:** 12/2/2014

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**  
Arco Recycling, Inc.  
**Permit Number:** P0117868  
**Facility ID:** 1318188703  
**Effective Date:** 12/2/2014

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



**1. F003, F003**

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

Construction and demolition debris sorting line. The line consists of screening, conveying, magnetic, hand picking, and sorting of demolition debris. The sorting line is controlled by automatic spray bars and watering at drop points.

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

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

a. None.

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

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) As effective 11/30/2001 ORC 3704.03(T)	Workplace practice plan for the control of fugitive dust. See b)(2)a. below. See d)(1) through d)(3) below.
b.	OAC rule 3745-31-05(A)(3)(b) As effective 12/1/2006	See b)(2)b. below.
c.	OAC rule 3745-31-05(F)	See c)(1) below.
d.	OAC rule 3745-17-07(B)	See b)(2)g. below.
e.	OAC rule 3745-17-08(B)	See b)(2)c. through b)(2)f. and d)(1) through d)(3) below.



(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. Permit to Install and Operate P0117868 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. Annual limitation of 2,080 operating hours.

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

c. The material handling operation(s) that are covered by this permit and subject to the following requirements are listed below:

- Hopper (load-in)
Screeners
All transfer and conveyor points
Waste Hopper (unloading into trucks)

d. The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to maintain the following control measures to ensure compliance with the above-mentioned applicable requirements:

Table with 2 columns: Material Handling and Processing Operation, Control Measures. Row 1: Loading and Unloading, Reduced drop height, wet application as necessary\*.



<b>Material Handling and Processing Operation</b>	<b>Control Measures</b>
Screening	Wet application as necessary, spray bars, and/or total enclosures.
Material Transfer and Conveying	Partial and/or total enclosures, wet applications, as necessary*

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

- e. For each material handling operation that is not adequately enclosed, the above-identified 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 above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that the use of the control measure(s) is (are) unnecessary.
  - f. Open-bodied vehicles transporting material likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
  - g. 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).
  - h. The permittee shall post a sign prohibiting the acceptance of any asbestos containing material (ACM). The permittee shall also post and maintain a sign at the facility entrance identifying, at a minimum, the name of the permittee, the hours of operation, and the authorized wastes.
  - i. The permittee shall train all staff at least once a calendar year. The training shall include identification of waste, safety, and proper management and handling of all wastes and materials on-site.
  - j. Incidental wastes processed in this emissions unit shall not exceed a total of five percent (5%) by weight of the overall load.
- c) Operational Restrictions
- (1) This emissions unit shall not be operated more than 2,080-hours per year.
  - (2) The permittee shall process only the following materials in this emissions unit:



- a. yard waste\*;
- b. agricultural wastes\*;
- c. animal waste\*;
- d. processed and/or unprocessed vegetables, fruits, or grains\*; and
- e. non-asbestos (Category I or Category II) containing construction and demolition debris in this emissions unit.

\*Feedstock types A, B, C, D, and D1 for composting facilities from OAC rule 3745-27-40.

- (3) The facility shall not accept for processing any regulated Asbestos-Containing Material (ACM) as defined in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asbestos, 40 CFR Part 61, Subpart M, Section 141 and OAC rule 3745-20, or any subsequent revisions to either rule. Regulated asbestos-containing material is defined to include:
  - a. friable asbestos material;
  - b. Category I non-friable ACM that will or has become friable;
  - c. Category I non-friable ACM that will be or has been subjected to sanding, grinding, cutting or abrading; and
  - d. Category II non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading.
- (4) Upon identification of any ACM, the permittee shall immediately transport the ACM to a landfill that is permitted to accept ACM.
- (5) The permittee shall not accept the following materials for processing in this emissions unit:
  - a. material from any source other than residential and/or former residential sources unless the material has been sampled and tested for asbestos;
  - b. any rolled or commercial roofing materials;
  - c. any asphalt siding shingle wastes;
  - d. any hazardous or special wastes; or
  - e. other construction and demolition waste other than that which may be incidentally associated with post-consumer asphalt roofing shingle waste from residential sources (i.e. tarpaper, wood, metal, nails, etc.).

d) **Monitoring and/or Recordkeeping Requirements**

- (1) **Work Practice Plan**



The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the material handling operation. This work practice plan shall include, at a minimum, the following elements:

- a. An identification of each piece of material handling equipment for which the work practice plan applies;
- b. A determination of the frequency that each piece of material handling equipment will be inspected to determine if additional control measures are needed;
- c. The identification of the record keeping form and/or record that will be used to track the inspections and treatment each portion of the material handling operation. This form/record should include, at a minimum, the following elements:
  - i. piece of equipment inspected;
  - ii. date inspected;
  - iii. name of the employee who either did the inspection or who can verify that the inspection was completed;
  - iv. results of the inspection (needs treated or does not need treated);
  - v. a description of why no treatment was needed;
  - vi. date treated;
  - vii. name of the employee who either treated the material handling operation or who can verify that the treatment occurred; and
  - viii. the treatment method used to reduce the emissions.
- d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the appropriate District Office or local air agency (DO/Laa) for review and approval. The permittee can begin using the revised Work Practice Plan once the appropriate DO/Laa has approved its use.

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each storage pile at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary if the material handling operation 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) Work Practice Plan Record Keeping

The permittee shall maintain records of the following information:

- a. The records required to be collected under the Work Practice Plan, and
- b. The date and reason any element of the Work Practice Plan was not implemented.

The permittee shall maintain these records in accordance to the Standard Terms and Conditions of Part I of this permit.

(4) The permittee shall maintain monthly records of the hours of operation of this emissions unit.

(5) The permittee shall maintain a record of each instance any material other than those permitted in c)(2) was processed.

(6) Prior to processing any materials, the permittee shall inspect all materials being accepted in order to determine whether or not ACM is present. If ACM is identified, the permittee shall record the following information:

- a. date of delivery of the asbestos-containing materials;
- b. physical description of the asbestos-containing materials;
- c. the amount of the asbestos-containing materials; and
- d. the name and location of the landfill used to dispose of the asbestos-containing materials.

(7) All personnel inspecting loads of incoming material shall be trained in the identification of ACM.

(8) The permittee shall develop and implement an ACM sampling plan and shall sample at a frequency adequate to safeguard against accidental processing of ACM. This plan shall be submitted for approval to the Cleveland Division of Air Quality (Cleveland DAQ) within 60 days of final issuance of this PTIO. Based on a history of sampling, the program may be modified at the request of the Cleveland DAQ or the company and can only be implemented following the Cleveland DAQ's approval.

(9) Loads that are suspected of containing ACM should be set aside and sampled in accordance with ASTM Standards for asbestos prior to processing. If any asbestos is identified, then that load shall not be processed and shall be sent to an asbestos-approved landfill.



All samples shall be analyzed using Polarized Light Microscopy (PLM), EPA Test Method 600/R-93-116, OSHA testing method number ID-101, or an equivalent test method approved by Ohio EPA.

The permittee shall receive the analytical test results identifying whether asbestos is present in the post-consumer pre-processed load prior to processing the sampled load.

The permittee shall reject all loads that test positive for asbestos. The permittee may, however, retest such loads to verify the test result prior to rejection. Rejected loads shall be disposed of at a permitted asbestos waste facility.

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 PER in accordance with the monitoring requirements for inspections in d) above:
  - 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 implemented as a result of an inspection, was not implemented;
  - c. any exceedance of the annual hourly operating limitation of 2,080 hours;
  - d. each date during which asbestos-containing materials were identified via visual inspection and sampling analysis as identified above;
  - e. the type of each asbestos-containing material identified;
  - f. the quantity of the asbestos-containing material; and
  - g. the name and the location of the landfill used to dispose of the asbestos-containing material.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. None.



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

Arco Recycling, Inc.

**Permit Number:** P0117868

**Facility ID:** 1318188703

**Effective Date:** 12/2/2014

g) Miscellaneous Requirements

- (1) The emissions from F003 have been determined to be fugitive in nature. BAT was based on the requirement for Arco Recycling to develop a workplace practice plan for the control and/or elimination of fugitive dust while this emissions unit is in operation.