



2/24/2015

Mr. Christopher Hamm  
Global Scrap Management Inc.  
4340 Batavia Road  
Batavia, OH 45103

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1413000540  
Permit Number: P0118267  
Permit Type: Initial Installation  
County: Clermont

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

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	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

## **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 Southwest Ohio Air Quality Agency at (513)946-7777 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: SWOAQA



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Global Scrap Management Inc.**

Facility ID:	1413000540
Permit Number:	P0118267
Permit Type:	Initial Installation
Issued:	2/24/2015
Effective:	2/24/2015
Expiration:	8/24/2021





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Global Scrap Management Inc.

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit? .....	4
3. What records must I keep under this permit? .....	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	4
6. What happens to this permit if my project is delayed or I do not install or modify my source? .....	5
7. What reports must I submit under this permit? .....	5
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? .....	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....	7
15. What happens if a portion of this permit is determined to be invalid? .....	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions .....	10
1. P003, 1.5 Ton/Hr Sweat Furnace w/ Afterburner.....	11





**Final Permit-to-Install and Operate**  
Global Scrap Management Inc.  
**Permit Number:** P0118267  
**Facility ID:** 1413000540  
**Effective Date:** 2/24/2015

## Authorization

Facility ID: 1413000540  
Application Number(s): A0052535  
Permit Number: P0118267  
Permit Description: Installation of a 1.5 ton/hour Sweat Furnace with an afterburner.  
Permit Type: Initial Installation  
Permit Fee: \$750.00  
Issue Date: 2/24/2015  
Effective Date: 2/24/2015  
Expiration Date: 8/24/2021  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Global Scrap Management Inc.  
4340 Batavia Road  
Batavia, OH 45103

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

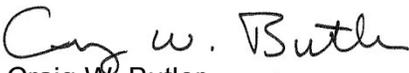
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219  
(513)946-7777

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**  
Global Scrap Management Inc.  
**Permit Number:** P0118267  
**Facility ID:** 1413000540  
**Effective Date:** 2/24/2015

## Authorization (continued)

Permit Number: P0118267

Permit Description: Installation of a 1.5 ton/hour Sweat Furnace with an afterburner.

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>P003</b>
Company Equipment ID:	P003
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Global Scrap Management Inc.  
**Permit Number:** P0118267  
**Facility ID:** 1413000540  
**Effective Date:** 2/24/2015

## **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**  
Global Scrap Management Inc.  
**Permit Number:** P0118267  
**Facility ID:** 1413000540  
**Effective Date:** 2/24/2015

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



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

Global Scrap Management Inc.

**Permit Number:** P0118267

**Facility ID:** 1413000540

**Effective Date:** 2/24/2015

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**  
Global Scrap Management Inc.  
**Permit Number:** P0118267  
**Facility ID:** 1413000540  
**Effective Date:** 2/24/2015

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



**1. P003, 1.5 Ton/Hr Sweat Furnace w/ Afterburner**

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

1.5 Ton/Hr Secondary Aluminum Sweat Furnace w/ Afterburner

- 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. b)(1)e., c)(1), d)(1)-d)(5), e)(1)-e)(2), and f)(1)g.
- 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) June 30, 2008	Install a natural gas fired burner designed to meet 0.10 lb. NOx/mmBtu of heat input to the furnace. Install a natural gas fired burner designed to meet 0.084 lb. CO/mmBtu of heat input to the furnace.  Install a natural gas fired burner designed to meet 0.0006 lb. SO <sub>2</sub> /mmBtu of heat input to the furnace.  Install a natural gas fired burner designed to meet 0.0055 lb. VOC/mmBtu of heat input to the furnace.  Install an afterburner that is designed to reduce PE/PM <sub>10</sub> /PM <sub>2.5</sub> emissions by 85% by weight. See b)(2)a. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under 3745-31-05(A)(3) do not apply to NOx, CO, SO2, VOC, or PE/PM10/PM2.5 emissions from this air contaminant source since the potential to emit is less than 10 tons/year.  See b)(2)b. below.
c.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation/control measure established pursuant to OAC 3745-31-05(A)(3).  See b)(2)c.
d.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
e.	40 CFR Part 63 Subpart RRR National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production  [This emission unit is defined as a New Sweat Furnace at a Secondary Aluminum Production Facility]	0.8 nanograms of dioxin/furan toxicity equivalents (TEQ) per dry standard cubic meter at 11 percent oxygen.  See c)(1), d)(1)-d)(5), e)(1)-e)(2), and f)(1)g.  See Appendix A to Subpart RRR of Part 63—for General Provision (40 CFR 63.1-40 CFR 63.15) Applicability to Subpart RRR.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(b) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The emission limitation established by OAC rule 3745-17-11(B) is 4.22 pounds of PE/hr. Once U.S. EPA approves the June 30, 2008 version of OAC rule 3745-31-05(A)(3)(a)(ii) as part of the State Implementation Plan, this will be the only particulate emission limitation/control measure.



c) Operational Restrictions

- (1) As specified in 40 CFR 63.1505(f), the permittee shall operate and maintain an afterburner with a design residence time of 0.8 second or greater and an operating temperature of 1600 °F or greater and operate the afterburner in accordance with the operation, maintenance and monitoring (OM&M) plan.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall prepare and implement, a written operation, maintenance, and monitoring (OM&M) plan. The permittee shall submit the OM&M plan to the Southwest Ohio Air Pollution Control Agency within 90 days after a successful initial performance test under 40 CFR 63.1511(b), or within 90 days after the compliance date established by 40 CFR 63.1501(b) if no initial performance test is required. The plan shall be accompanied by a written certification by the permittee that the OM&M plan satisfies all requirements of 40 CFR 63.1510(b) and is otherwise consistent with the requirements of 40 CFR 63.1510(b). The permittee shall comply with all of the provisions of the OM&M plan as submitted to the Southwest Ohio Air Pollution Control Agency, unless and until the plan is revised in accordance with the following procedures. If the Southwest Ohio Air Pollution Control Agency determines at any time after receipt of the OM&M plan that any revisions of the plan are necessary to satisfy the requirements of 40 CFR 63.1510(b) or this subpart (40 CFR Part 63 Subpart RRR), the permittee shall promptly make all necessary revisions and resubmit the revised plan. If the permittee determines that any other revisions of the OM&M plan are necessary, such revisions will not become effective until the permittee submits a description of the changes and a revised plan incorporating them to the permitting authority. Each plan shall contain the information specified in 40 CFR 63.1510(b)(1)-(b)(8).
- (2) The permittee must develop a written plan Startup, shutdown, and malfunction plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:
  - a. Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
  - b. Corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
- (3) The permittee must install, calibrate, maintain, and operate a device to continuously monitor and record the operating temperature of the afterburner consistent with the requirements for continuous monitoring systems in 40 CFR Part 63 Subpart A.



- a. The temperature monitoring device must meet each of these performance and equipment specifications:
  - i. The temperature monitoring device must be installed at the exit of the combustion zone of each afterburner;
  - ii. The monitoring system must record the temperature in 15-minute block averages and determine and record the average temperature for each 3-hour block period;
  - iii. The recorder response range must include zero and 1.5 times the average temperature established according to the requirements in 40 CFR63.1512(m); and
  - iv. The reference method must be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference, subject to approval by the Administrator.
  
- (4) The permittee must conduct an inspection of each afterburner at least once a year and record the results. At a minimum, an inspection must include:
  - a. Inspection of all burners, pilot assemblies, and pilot sensing devices for proper operation and clean pilot sensor;
  - b. Inspection for proper adjustment of combustion air;
  - c. Inspection of internal structures (e.g., baffles) to ensure structural integrity;
  - d. Inspection of dampers, fans, and blowers for proper operation;
  - e. Inspection for proper sealing;
  - f. Inspection of motors for proper operation;
  - g. Inspection of combustion chamber refractory lining and clean and replace lining as necessary;
  - h. Inspection of afterburner shell for corrosion and/or hot spots;
  - i. Documentation, for the burn cycle that follows the inspection, that the afterburner is operating properly and any necessary adjustments have been made;
  - j. Verification that the equipment is maintained in good operating condition; and
  - k. Following an equipment inspection, all necessary repairs must be completed in accordance with the requirements of the OM&M plan.
  
- (5) The permittee shall inspect the capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements in 40 CFR63.1506(c) and record the results of each inspection.



- (6) 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 stack 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. Whether the emissions are representative of normal operations;
  - c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. The total duration of any visible emissions incident; and
  - e. Any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit a notification of compliance status report within 90 days after conducting the initial performance test required by §63.1511(b), or within 90 days after the compliance date established by §63.1501(b) if no initial performance test is required. The notification must be signed by the responsible official who must certify its accuracy. A complete notification of compliance status report must include the information specified in paragraphs 40 CFR 63.1515(b)(1) through (b)(10).
- (2) The permittee shall submit semiannual Excess emissions/summary report reports according to the requirements in 40 CFR 63.10(e)(3). Except, the permittee must submit the semiannual reports within 60 days after the end of each 6-month period instead of within 30 days after the calendar half as specified in 40 CFR 63.10(e)(3)(v). When no deviations of parameters have occurred, the permittee shall submit a report stating that no excess emissions occurred during the reporting period. The report, at a minimum should include the applicable requirements specified in 40 CFR 63.1516(b)(1)-(b)(3).
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Southwest Ohio Air Pollution Control 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.



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:

4.22 lb./hr. of particulate emissions (PE)

Applicable Compliance Method:

Compliance may be demonstrated by adding PE from the furnace and the burner. First, multiply the rated capacity of the emission unit (1.5 ton/hr.) by the AP-42 emission factor of 14.5 lb./ton (AP-42 Table 12.8-2, (October 1986)). The result is multiplied by a control efficiency 85%. Second, multiply the rated capacity of the burner (3 mmBtu/hr.) by the AP-42 emission factor of 0.00745 lb./mmBtu (AP-42 Table 1.4-2 (July 1998)). Then, add the two results together.

If required, the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: 40 CFR Part 60, Appendix A, Methods 1-5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

0.084 lb. CO/mmBtu of heat input

Applicable Compliance Method:

Compliance may be demonstrated by AP-42 emission factor of 0.084 lb./mmBtu of Natural Gas combusted (AP-42 Table 1.4-1 (July 1998)).

If required, the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: 40 CFR Part 60, Appendix A, Methods 1-4, and Method 10. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

c. Emission Limitation:

0.0006 lb. SO<sub>2</sub>/mmBtu of heat input

Applicable Compliance Method:

Compliance may be demonstrated by AP-42 emission factor of 0.0006 lb./mmBtu of Natural Gas combusted (AP-42 Table 1.4-2 (July 1998)).

If required, the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: 40 CFR Part 60, Appendix A, Methods 1-4, and Method 6. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.



d. Emission Limitation:

0.10 lb. NO<sub>x</sub>/mmBtu of heat input.

Applicable Compliance Method:

Compliance may be demonstrated by AP-42 emission factor of 0.1 lb./mmBtu of Natural Gas combusted (AP-42 Table 1.4-1 (July 1998)).

If required, the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: 40 CFR Part 60, Appendix A, Methods 1-4, and Method 7. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

e. Emission Limitation:

0.0055 lb. VOC/mmBtu of heat input.

Applicable Compliance Method:

Compliance may be demonstrated by AP-42 emission factor of 0.0055 lb./mmBtu of Natural Gas combusted (AP-42 Table 1.4-2 (July 1998)).

If required, the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: 40 CFR Part 60, Appendix A, Methods 1-4, and Method 24. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

f. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g. Emission Limitation:

0.8 nanograms TEQ per dry standard cubic meter at 11 percent oxygen of dioxin/furan emissions

Applicable Compliance Method:

Compliance with the emission limitation shall be assumed provided the operating temperature of the afterburner of 1600°F or greater is maintained and the afterburner is designed with a residence time of 0.8 second or greater.



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

Global Scrap Management Inc.

**Permit Number:** P0118267

**Facility ID:** 1413000540

**Effective Date:** 2/24/2015

h. Emission Limitation:

Install an afterburner that is designed to reduce PE/PM10/PM2.5 emissions by 85% by weight.

Applicable Compliance Method:

Based on the company supplied design estimate as supplied in the PTIO application P0118267 received December 18, 2014.

g) Miscellaneous Requirements

(1) None.