



John R. Kasich, Governor
 Mary Taylor, Lt. Governor
 Craig W. Butler, Director

Certified Mail

10/27/2015

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mr. Wally Dawson
 PSC METALS INC
 3101 VARLEY AVE SW
 CANTON, OH 44706

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1576000113
 Permit Number: P0100933
 Permit Type: Renewal
 County: Stark

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
 77 South High Street, 17th Floor
 Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

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

If you have any questions, please contact Canton City Health Department at (330)489-3385 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: Canton



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
PSC METALS INC**

Facility ID:	1576000113
Permit Number:	P0100933
Permit Type:	Renewal
Issued:	10/27/2015
Effective:	10/27/2015
Expiration:	10/27/2025



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

for
PSC METALS INC

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Final Permit-to-Install and Operate
PSC METALS INC
Permit Number: P0100933
Facility ID: 1576000113
Effective Date: 10/27/2015

Authorization

Facility ID: 1576000113
Application Number(s): A0032682, A0049637
Permit Number: P0100933
Permit Description: PTIO renewal permit for the auto-shredder and torch cutting units.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 10/27/2015
Effective Date: 10/27/2015
Expiration Date: 10/27/2025
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

PSC METALS INC
3101 VARLEY AVE SW
CANTON, OH 44706

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

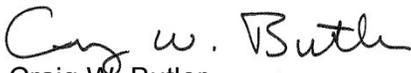
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

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
PSC METALS INC
Permit Number: P0100933
Facility ID: 1576000113
Effective Date: 10/27/2015

Authorization (continued)

Permit Number: P0100933

Permit Description: PTIO renewal permit for the auto-shredder and torch cutting units.

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

Emissions Unit ID:	F004
Company Equipment ID:	Fugitive Dust
Superseded Permit Number:	P0073923
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P901
Company Equipment ID:	P001
Superseded Permit Number:	15-01708
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
PSC METALS INC
Permit Number: P0100933
Facility ID: 1576000113
Effective Date: 10/27/2015

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
PSC METALS INC
Permit Number: P0100933
Facility ID: 1576000113
Effective Date: 10/27/2015

B. Facility-Wide Terms and Conditions



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
PSC METALS INC
Permit Number: P0100933
Facility ID: 1576000113
Effective Date: 10/27/2015

C. Emissions Unit Terms and Conditions

1. F004, Torch Cutting Stations

Operations, Property and/or Equipment Description:

Torch Cutting Stations 2 separate areas both uncontrolled

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 3745-17-07(B)	Visible particulate emissions (PE) of fugitive dust from this emissions unit shall not exceed twenty percent opacity, as a three-minute average.
b.	OAC rule 3745-17-08(B)	The permittee shall utilize reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a.

(2) Additional Terms and Conditions

a. Employing good operating practices to minimize accidental fires. Such practices shall include, but not be limited to, the following items: cutting metal that is clean of any oils(s) or other combustible fluids, the minimization of flame impingement with the ground, and the use of appropriately sized cutting torches.

Implementation of the control measures mentioned above is appropriate and sufficient to satisfy the requirements of OAC 3745-17-08. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c) Operational Restrictions

- (1) The permittee shall have fire extinguishers of the appropriate type located near the torch cutting operations and they shall be employed promptly to extinguish any accidental fires caused by the torch cutting operations.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible 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 reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) 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.

- (3) The permittee shall identify in the annual permit evaluation report when the following occurrences happened during the 12-month reporting period for these emissions units:
 - a. all days during which any visible emissions of fugitive dust were observed from this emissions unit; and
 - b. any corrective actions taken to eliminate the visible emissions.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Visible PE of fugitive dust from this emissions unit shall not exceed twenty percent opacity, as a three-minute average.

Applicable Compliance Method

If required, compliance with the visible PE limitation listed above shall be determined in accordance with OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.

2. P901, Shredder

Operations, Property and/or Equipment Description:

224 tons/hour auto shredder equipped with a water injection control system(water injection system which creates a steam plume) to control fugitive PE with ferrous magnetic material separation and a cyclone w/ZBox hood attached. Model 98/104 manufactured by Wendt.

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. d)(7), d)(8) and d)(9).

(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)	<p>Particulate Emissions (PE) from the cyclone stack shall not exceed 0.10 grains (gr)/dry standard cubic foot (dscf), 7.88 lbs/hr and 15.8 tons per year (TPY)</p> <p>Mercury (Hg) emissions shall not exceed 0.020 TPY</p> <p>Visible particulate emissions from the cyclone stack shall not exceed 5% opacity, as a six minute average</p> <p>Best Available Control Measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [See b)(2)a. through b)(2)c. below].</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(B)	Visible PE of fugitive dust from this emissions unit shall not exceed twenty percent opacity, as a three-minute average.
c.	OAC rule 3745-17-08(B)	The control measure requirements specified by this rule are less stringent than the control measure requirements specified by OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	The emissions limitation specified by the rule is less stringent than the emission limitation specified by OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(B)	The emissions limitation specified by the rule is less stringent than the emission limitation specified by OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control measures to minimize or eliminate visible emissions of fugitive dust. Such practices shall include, but not be limited to:
 - i. the use of the cyclone for product recovery;
 - ii. enclosures of hammers with metal casings;
 - iii. use of chemical, water, or other dust suppressant for the storage piles; and
 - iv. partial enclosure of material piles located under the cyclone system material drop off points.
- b. For each material handling operation that is not adequately enclosed, the above identified control measures shall be implemented if the permittee determines as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during operation of the material handling operations until further observation confirms that the use of the control measures is unnecessary.
- c. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) Water sprays shall be operated at points necessary to ensure compliance with the visible emission limitations specified above.
- (2) The Smart Water Injection System, the ferrous magnetic material separation, the Z-Box inertial separation device and the cyclone shall be operated when the auto shredder is in operation.
- (3) The permittee shall not process any materials (including vehicles) through the shredder where the following has not been removed:
 - a. readily accessible mercury-containing devices located in the trunk and the hood of whole vehicles; and
 - b. all combustible liquids and batteries.
- (4) The permittee committed to incorporate pre-legislative controls through a mercury-containing convenience light switch removal program. The mercury-containing convenience light switch removal program shall be implemented whereby the permittee will remove readily accessible mercury-containing convenience light switches from whole cars delivered to the facility.
- (5) The maximum operating hours for this emissions unit when processing automobiles and white goods shall not exceed 4,000 operating hours per year. The restriction for processing automobiles is not for the purpose of limiting potential to emit (PTE) but for minimizing the release of Hg annually.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily inspections, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from this emissions unit. 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 conditions.
- (2) The permittee may, upon receipt of written approval from the Canton City Health, modify the above-mentioned inspection frequencies if operating experience indicated that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (3) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and

- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

- (4) 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 cyclone stack. The presence or absence of any visible particulate emissions from the cyclone stack shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective action taken to eliminate the visible emissions.
- (5) The permittee shall maintain monthly records of the hours of operation for this emissions unit, in hours per month and total hours, to date, for the calendar year.
- (6) 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. readily accessible mercury-containing devise located in the trunk and hood of the whole vehicle; and
 - b. all combustible liquids and batteries.
- (7) The original permit-to-install and operate (PTIO), 15-01708 issued 6/12/2008, for this emissions unit, P901, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Mercury

TLV (mg/m3): 25

Maximum Hourly Emission Rate (lbs/hr): 0.0102405

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.2

MAGLC (ug/m3): 0.2

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install (or permit-to-install-and-operate PTIO) will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install (or PTIO) prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- d. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - e. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - f. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- (8) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can

affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final **PTIO** prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (9) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) 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.
- (3) The permittee shall identify in the annual permit evaluation report when the following occurrences happened during the 12-month reporting period for this emissions unit:
 - 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.

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:

Visible particulate emissions from the cyclone stack shall not exceed 5% opacity, as a six minute average.

Applicable Compliance Method:

If required, compliance with the limitation for visible emissions from the cyclone stack shall be determined through visible emissions observations performed in accordance Method 9 of 40 CFR Part 60, Appendix A.
 - b. Emission Limitation:

PE from the cyclone stack shall not exceed 7.88 lb/hr.

Applicable Compliance Method:

The hourly limitation was determined by the following method:

The maximum amount of trash material processed will be 31.27 gross tons per hour (25% of material exiting the shredder and entering the separation equipment).

The ferro-magnetic separation has a 95% control efficiency for trash removal. The Z-Box inertial separator has a 90% control efficiency for trash removal. The cyclone has a 99% control efficiency for trash removal.

The blower that draws air through the cyclone has a 60,000 CFM capacity. The air flow from the cyclone is split and 25% of the air flow goes out the stack and 75% of the air flow is recycled through the Z-Box and cyclone. Based on emissions testing at other similar PSC Metals, Inc. auto shredders with a cyclone and recycle, the quantity of the emissions escaping through the stack is proportional to the air flow recycle percentage.

The hourly particulate emissions from the stack in pound per hour, E, shall be calculated as follows.

$$E = 31.27 \text{ gr tons/hr} \times 0.05 \text{ (magnet)} \times 0.90 \text{ (Z-Box)} \times 0.01 \text{ (cyclone)} \times 0.25 \text{ (air flow recycle)} \times 2,240 \text{ lb/gr ton}$$

$$E = 7.88 \text{ lb PE/hr}$$

If required, compliance with the hourly limitation shall be demonstrated in accordance with Methods 1 – 5 of 40 CFR Part 60, Appendix A.

c. Emission Limitation:

PE from the cyclone stack shall not exceed 0.10 gr/dscf.

Applicable Compliance Method:

The gr/dscf limitation was determined by the following method:

$$7.88 \text{ lb/hr} \times 7,000 \text{ gr/lb} \times \text{hr}/60 \text{ min} \times 1/0.25(60,000 \text{ cfm}) = 0.067 \text{ gr/dscf} \sim 0.10 \text{ gr/dscf}$$

If required, compliance with the gr/dscf limitation shall be demonstrated in accordance with Methods 1 – 5 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

PE from the cyclone stack shall not exceed 15.8 TPY.

Applicable Compliance Method:

The annual limitation* was determined by multiplying the hourly rate of 7.88 lbs PE/hr by 4,000 hours and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

$$*7.88 \text{ lb PE/hr} \times 4,000 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lb} = 15.8 \text{ tons PE/yr}$$

e. Emission Limitation:

Hg emissions shall not exceed 0.020 TPY

Applicable Compliance Method:

The annual limitation is based on an emission rate of 0.01 lb Hg per hour* which was derived from the Maximum Allowable Ground Level Concentration (MAGLC) for mercury as determined by Ohio EPA's Air Toxics Policy. The annual emission limitation is based on the hourly emission rate being multiplied by a maximum annual operating schedule of 4,000 hours and divided by a conversion factor of 1 ton per 2000 pounds. Therefore, provided compliance is shown with the annual operating restriction of 4,000 hours for the processing of cars and white goods and with the requirements of this permit to remove mercury-containing devices (see section c)(4)), compliance with the ton-per-year Hg limitation for this emissions unit shall also be demonstrated.

*The emission rate of 0.01 lb Hg per hour** represents 58 mercury switches per 100 automobiles at 1 gram Hg per switch with 10% of the total mercury being emitted from the shredder. **Based on 100 cars/hr = 100 Tons/hr Feed Rate
 $4,000 \text{ hrs} \times 0.01 \text{ lb Hg/hr} \times 1 \text{ ton}/2000 \text{ lb} = 0.02 \text{ ton Hg/yr}$

f. Emission Limitation:

Visible PE of fugitive dust from this emissions unit shall not exceed twenty percent opacity, as a three-minute average.

Applicable Compliance Method

If required, compliance with the visible PE limitation listed above shall be determined in accordance with OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

(1) None.