

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **16-02380**

A. Source Description

The City Scrap & Salvage Company facility located in Akron, Summit County, OH, is installing two (2) 1650 BHP natural gas-fired internal combustion engines to replace a single 2000 BHP diesel-fired internal combustion engine currently used to drive a scrap metal shredder. The diesel engine will be permanently shutdown and dismantled prior to installation of the two natural gas engines.

B. Facility Emissions and Attainment Status

Unrestricted facility emissions of nitrogen oxides (NO_x) and carbon monoxide (CO) are the only pollutants that have the potential to exceed both moderate nonattainment and Title V major stationary source threshold levels. Summit County is moderate nonattainment for 8-hour ozone.

C. Source Emissions

The only other source that emits NO_x and CO is a de minimis building furnace with a maximum heat input of 182,000 Btu/hour. Therefore, the two natural gas engines represent the facility for emissions of NO_x and CO. The facility has opted for synthetic minor status to stay out of both moderate nonattainment and Title V programs using federally enforceable natural gas fuel usage restrictions of 54.4 million cubic feet per year, based upon a rolling, 12-month basis, limiting potential facility emissions of NO_x and CO each at 99.0 tpy, based upon a rolling, 12-month basis.

D. Conclusion

If there are no deviations from operational procedures, equipment specifications, or any other associated parameters, as stated in the application, that imperil the effectiveness of the synthetic minor strategy, then ensuring no exceedances of the federally enforceable fuel usage limitations for the facility via diligent evaluation, monitoring and record keeping should be sufficient to keep the facility out of both moderate nonattainment and Title V programs.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
SUMMIT COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

Application No: 16-02380

Fac ID: 1677010437

DATE: 11/16/2004

City Scrap and Salvage Co Inc
Randy Katz
611 W Wilbeth Rd
Akron, OH 44314

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

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

CC: USEPA

ARAQMD

Akron Met Area Transportation Study

WV

PA

SUMMIT COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 16-02380 FOR AN AIR CONTAMINANT SOURCE FOR
City Scrap and Salvage Co Inc

On 11/16/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **City Scrap and Salvage Co Inc**, located at **611 W Wilbeth Rd, Akron, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 16-02380:

Two Natural Gas Fired Engines.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Lynn Malcolm, Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308 [(330)375-2480]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 16-02380

Application Number: 16-02380
Facility ID: 1677010437
Permit Fee: **To be entered upon final issuance**
Name of Facility: City Scrap and Salvage Co Inc
Person to Contact: Randy Katz
Address: 611 W Wilbeth Rd
Akron, OH 44314

Location of proposed air contaminant source(s) [emissions unit(s)]:

**611 W Wilbeth Rd
Akron, Ohio**

Description of proposed emissions unit(s):

Two Natural Gas Fired Engines.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. Permit to Install General Terms and Conditions**1. Compliance Requirements**

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

Issued: To be entered upon final issuance

information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

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City Scrap and Salvage Co Inc

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Issued: To be entered upon final issuance

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
NOx	99.0
CO	99.0

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	minimis (per OAC rule 3745-15-05) building furnace rated at 182,000 Btu/hour, is a natural minor source (i.e., unrestricted PTE below Title V major source emissions thresholds) of particulate matter (PM-10), sulfur dioxide (SO ₂), volatile organic compound (VOC), and hazardous air pollutant (HAP) emissions.	<u>Applicable Rules/Requirements</u>
B002 (Engine "A") natural gas-fired stationary large internal combustion engine [Waukesha Model VHPL7042GSI, 4-stroke/rich-burn, 1650 Bhp maximum rated power output, and 12.0 million Btu/hr maximum rated heat input] driving a scrap metal shredder, particulate emissions (PE) and hourly emissions of nitrogen oxides (NO _x) and carbon monoxide (CO) uncontrolled; application includes facility-requested federally enforceable Synthetic Minor Title V (SMTV) fuel usage restrictions to limit the facility's potential to emit (PTE) NO _x and CO below major source emission thresholds.		OAC rule 3745-31-05(A)(3)
		OAC rule 3745-17-11(B)(5)(b)
		OAC rule 3745-21-08(B) OAC rule 3745-21-07(B)
<u>Note:</u> This facility, which consists of B002, B003, F001 (material handling/storage piles), P001 (shredder/separator), and a de		OAC rule 3745-17-07(A)

Emissions Unit ID: B002

OAC rule 3745-23-06(B)

OAC rule 3745-31-05(C)
(to avoid moderate nonattainment
program requirements);
OAC rule 3745-35-07(B)
(to avoid Title V program
requirements)

Applicable Emissions
Limitations/Control Measures

Nitrogen oxides (NOx) shall not exceed 50.0 pounds/hour; and carbon monoxide(CO) shall not exceed 50.0 pounds/hour.

1% opacity from the stack, as a 6-minute average

The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-21-07(B), 3545-31-05(C) and 3745-35-07(B).

0.062 pound of PE per million Btu actual heat input for a stationary large internal combustion engine

See A.2.b below.

The emissions limitations and control requirements specified by these rules are less stringent than the emissions limitations and control requirements established pursuant to OAC rule 3745-31-05(A)(3).

The following annual facility emissions limits are based upon a rolling, 12-month summation of the monthly emissions, per

the federally enforceable fuel usage restrictions of B.2:

99.0 tons/year of NOx; and
99.0 tons/year of CO.

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2. Additional Terms and Conditions

2.a The hourly NOx and CO emissions limitations established pursuant to OAC rule 3745-31-05(A)(3), and the PE limitation from OAC rule 3745-17-11(B)(5)(b) are greater than the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emissions limitations.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

2.b The permittee satisfies the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 and 3745-21-07(B), respectively, by complying with the best available technology requirements of OAC rule 3745-31-05(A)(3).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the 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 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2.c OAC Chapter 3745-18 does not establish an SO2 emissions limitation for this emissions unit because the emissions unit burns only natural gas.

2.d The emissions of NOx and emissions of CO from the facility shall each not exceed 99.0 tons per year, based upon a rolling, 12-month summation of the monthly facility emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the facility emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Facility Emissions of NOx (Tons)</u>	<u>Maximum Allowable Cumulative Facility Emissions of CO (Tons)</u>
1	8.2	8.2
1-2	16.5	16.5
1-3	24.8	24.8

Emissions Unit ID: **B002**

1-4	33.0	33.0
1-5	41.2	41.2
1-6	49.5	49.5
1-7	57.8	57.8
1-8	66.0	66.0
1-9	74.2	74.2
1-10	82.5	82.5
1-11	90.8	90.8
1-12	99.0	99.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility emission limitations for NOx and CO shall each be based upon a rolling, 12-month summation of the monthly facility emissions.

B. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.
2. The maximum annual natural gas usage for the facility shall not exceed 54.4 million cubic feet, based upon a rolling, 12-month summation of the monthly gas usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the natural gas usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Facility Natural Gas Usage (million cubic feet)</u>
1	4.5
1-2	9.1
1-3	13.6
1-4	18.1
1-5	22.7
1-6	27.2
1-7	31.8
1-8	36.3
1-9	40.8
1-10	45.4
1-11	50.0
1-12	54.4

After the first 12 calendar months of operation following the issuance of this permit, compliance

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with the annual facility natural gas usage limitation shall be based upon a rolling, 12-month summation of the monthly facility natural gas usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain monthly records of the following information:
 - a. The facility natural gas usage for each month, in million cubic feet.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly facility natural gas usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative facility natural gas usage for each calendar month.

3. The permittee shall maintain monthly records of the following information:
 - a. The monthly facility emissions (tons) for each of NO_x and CO, based upon a NO_x emission factor and a CO emission factor each equal to 1.82 tons/million cubic feet of natural gas. The NO_x and CO emission factors were developed from manufacturer's engine and emissions data.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit the rolling, 12-month summation of the monthly facility emissions (tons) for each of NO_x and CO.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative facility emissions (tons) for each of NO_x and CO for each calendar month.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day, type and quantity of fuel when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility natural gas usage limitation and, for the first 12 calendar months of

Issued: To be entered upon final issuance

operation following the issuance of this permit, all exceedances of the maximum allowable cumulative facility natural gas usage levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for NO_x and/or CO and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative facility emission levels for NO_x and/or CO. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods using applicable emission factors, as noted:

- a. Emission Limitation: 1% opacity, as a 6-minute average

Applicable Compliance Method: If required, compliance shall be determined by visible particulate emissions evaluations performed using the procedures specified in USEPA Method 9.

- b. Emission Limitation: 0.062 pound of PE per million Btu actual heat input

Applicable Compliance Method:

The permittee may use the AP-42, 7/00, Table 3.2-3 emission factor of 0.00950 pound of particulates (filterable) per million Btu of actual heat input to demonstrate compliance. This assumes all particulates emitted are of aerodynamic diameter of 10 micrometers or under.

If required, compliance shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 5 and the methods and procedures specified in OAC rule 3745-17-03(B)(10).

- c. Emission Limitation: 50.0 pounds/hour NO_x

Applicable Compliance Method: The permittee may demonstrate compliance with the above limitations based upon the following calculations of the potential to emit:

$$H = PN(1 \text{ pound}/453.6 \text{ grams}) = 43.7 \text{ pounds/hour of NO}_x$$

City Scrap and Salvage Co Inc
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Facility ID: 1677010437

Emissions Unit ID: **B002**

where:

H = hourly potential to emit;

P = 1650 BHP [internal combustion engine maximum rated output power]; and

N = 12.0 GRAMS/BHP-HR [manufacturer's NOx emission factor].

If required, compliance with the hourly NOx emissions limit shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 7E.

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- d. Emission Limitation: 50.0 pounds/hour CO

Applicable Compliance Method: The permittee may demonstrate compliance with the above limitations based upon the following calculations of the potential to emit:

$$H = PC(1 \text{ pound}/453.6 \text{ grams}) = 43.7 \text{ pounds/hour of CO}$$

where:

H = hourly potential to emit;

P = 1650 BHP [internal combustion engine maximum rated output power]; and

C = 12.0 GRAMS/BHP-HR [manufacturer's CO emission factor].

If required, compliance with the hourly CO emissions limit shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 10.

- e. Emission Limitations: 99.0 tons/year of NO_x and 99.0 tons/year of CO based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of sections C.2 and C.3 above.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The permittee shall not operate this emissions unit until B001 (existing 2000 BHP diesel engine) is permanently shutdown and disabled with fuel line removed. The permittee shall furnish the Agency written confirmation of the permanent shutdown and disable date. Under no circumstances shall B002 and/or B003 operate while B001 operates.
3. Except for F.1 of these special terms and conditions, all of the terms and conditions of this permit are federally enforceable, pursuant to both OAC rules 3745-31-05(C) and 3745-35-07(B).

Emissions Unit ID: **B003**

program requirements);
OAC rule 3745-35-07(B)
(to avoid Title V program
requirements)

Applicable Emissions
Limitations/Control Measures

Nitrogen oxides (NOx) shall
not exceed 50.0 pounds/hour;
and carbon monoxide (CO)
shall not exceed 50.0
pounds/hour.

1% opacity from the stack, as
a 6-minute average

The requirements of OAC rule
3745-31-05(A)(3) also include
compliance with the
requirements of OAC rules
3745-21-08(B),
3745-21-07(B), and
3745-35-07(B).

0.062 pound of PE per million
Btu actual heat input for a
stationary large internal
combustion engine

See A.2.b below.

The emissions limitations and
control requirements specified
by these rules are less stringent
than the emissions limitations
and control requirements
established pursuant to OAC
rule 3745-31-05(A)(3).

The following annual facility
emissions limits are based
upon a rolling, 12-month
summation of the monthly

emissions, per the federally enforceable
fuel usage restrictions of B.2:

99.0 tons/year of NOx; and
99.0 tons/year of CO.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The hourly NO_x and CO emissions limitations established pursuant to OAC rule 3745-31-05(A)(3), and the PE limitation from OAC rule 3745-17-11(B)(5)(b) are greater than the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emissions limitations.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- 2.b** The permittee satisfies the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 and 3745-21-07(B), respectively, by complying with the best available technology requirements of OAC rule 3745-31-05(A)(3).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the 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 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.c** OAC Chapter 3745-18 does not establish an SO₂ emissions limitation for this emissions unit because the emissions unit burns only natural gas.

- 2.d** The emissions of NO_x and emissions of CO from the facility shall each not exceed 99.0 tons per year, based upon a rolling, 12-month summation of the monthly facility emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the facility emission levels specified in the following table:

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 PTI Application: 16-02280
 Issued

Facility ID: 1677010437

Emissions Unit ID: B003

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Facility Emissions of NOx (Tons)</u>	<u>Maximum Allowable Cumulative Facility Emissions of CO (Tons)</u>
1	8.2	8.2
1-2	16.5	16.5
1-3	24.8	24.8
1-4	33.0	33.0
1-5	41.2	41.2
1-6	49.5	49.5
1-7	57.8	57.8
1-8	66.0	66.0
1-9	74.2	74.2
1-10	82.5	82.5
1-11	90.8	90.8
1-12	99.0	99.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility emission limitations for NOx and CO shall each be based upon a rolling, 12-month summation of the monthly facility emissions.

B. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.
2. The maximum annual natural gas usage for the facility shall not exceed 54.4 million cubic feet, based upon a rolling, 12-month summation of the monthly gas usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the natural gas usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Facility Natural Gas Usage (million cubic feet)</u>
1	4.5
1-2	9.1
1-3	13.6
1-4	18.1
1-5	22.7

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1-6	27.2
1-7	31.8
1-8	36.3
1-9	40.8
1-10	45.4
1-11	50.0
1-12	54.4

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility natural gas usage limitation shall be based upon a rolling, 12-month summation of the monthly facility natural gas usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain monthly records of the following information:
 - a. The facility natural gas usage for each month, in million cubic feet.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly facility natural gas usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative facility natural gas usage for each calendar month.

3. The permittee shall maintain monthly records of the following information:
 - a. The monthly facility emissions (tons) for each of NO_x and CO, based upon a NO_x emission factor and a CO emission factor each equal to 1.82 tons/million cubic feet of natural gas. The NO_x and CO emission factors were developed from manufacturer's engine and emissions data.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit the rolling, 12-month summation of the monthly facility emissions (tons) for each of NO_x and CO.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative facility emissions (tons) for each of NO_x and CO for each calendar month.

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D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day, type and quantity of fuel when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility natural gas usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative facility natural gas usage levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for NO_x and/or CO and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative facility emission levels for NO_x and/or CO. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods using applicable emission factors, as noted:
 - a. Emission Limitation: 1% opacity, as a 6-minute average

Applicable Compliance Method: If required, compliance shall be determined by visible particulate emissions evaluations performed using the procedures specified in USEPA Method 9.
 - b. Emission Limitation: 0.062 pound of PE per million Btu actual heat input

Applicable Compliance Method:

The permittee may use the AP-42, 7/00, Table 3.2-3 emission factor of 0.00950 pound of particulates (filterable) per million Btu of actual heat input to demonstrate compliance. This assumes all particulates emitted are of aerodynamic diameter of 10 micrometers or under.

If required, compliance shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 5 and the methods and procedures specified in OAC

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rule 3745-17-03(B)(10).

- c. Emission Limitation: 50.0 pounds/hour NO_x

Applicable Compliance Method: The permittee may demonstrate compliance with the above limitations based upon the following calculations of the potential to emit:

$$H = PN(1 \text{ pound}/453.6 \text{ grams}) = 43.7 \text{ pounds/hour of NO}_x$$

where:

H = hourly potential to emit;

P = 1650 BHP [internal combustion engine maximum rated output power]; and

N = 12.0 GRAMS/BHP-HR [manufacturer's NO_x emission factor].

If required, compliance with the hourly NO_x emissions limit shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 7E.

- d. Emission Limitation: 50.0 pounds/hour CO

Applicable Compliance Method: The permittee may demonstrate compliance with the above limitations based upon the following calculations of the potential to emit:

$$H = PC(1 \text{ pound}/453.6 \text{ grams}) = 43.7 \text{ pounds/hour of CO}$$

where:

H = hourly potential to emit;

P = 1650 BHP [internal combustion engine maximum rated output power]; and

C = 12.0 GRAMS/BHP-HR [manufacturer's CO emission factor].

If required, compliance with the hourly CO emissions limit shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 10.

- e. Emission Limitations: 99.0 tons/year of NO_x and 99.0 tons/year of CO based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of sections C.2 and C.3 above.

F. Miscellaneous Requirements

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1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The permittee shall not operate this emissions unit until B001 (existing 2000 BHP diesel engine) is permanently shutdown and disabled with fuel line removed. The permittee shall furnish the Agency written confirmation of the permanent shutdown and disable date. Under no circumstances shall B002 and/or B003 operate while B001 operates.
3. Except for F.1 of these special terms and conditions, all of the terms and conditions of this permit are federally enforceable, pursuant to both OAC rules 3745-31-05(C) and 3745-35-07(B).