



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
MONTGOMERY COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 08-4001

DATE: November 10, 1999

Metal Shredders, Inc.
Etheridge Wilson
PO Box 244
West Carrollton, OH 45449

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: USEPA
REGIONAL AIR POLLUTION CONTROL AGENCY



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: November 10, 1999

FINAL PERMIT TO INSTALL 08-4001

Application Number: 08-4001
APS Premise Number: 0857190584
Permit Fee: **\$2000**
Name of Facility: Metal Shredders, Inc.
Person to Contact: Etheridge Wilson
Address: PO Box 244
West Carrollton, OH 45449

Location of proposed air contaminant source(s) [emissions unit(s)]:
5101 Farmersville-West Carrollton Road
Jefferson Township, Ohio

Description of proposed emissions unit(s):
90 TPH AUTOMOBILE SHREDDER, Z-BOX SEPARATOR.

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

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Facility ID: **0857190584**

Part I - GENERAL TERMS AND CONDITIONS

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 Related to Monitoring and Recordkeeping 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

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representative of the Director, upon receipt of a written request and within a reasonable time, any 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

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Environmental Protection Agency if the proposed sources are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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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>
Particulates	12.1

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

A. Applicable Emissions Limitations and/or Control Requirements

- 1. 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>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
90 TPH Automobile Shredder	OAC rule 3745-31-05(A)(3)	2.8 lbs/hr and 5.38 TPY Particulate Emissions. Visible emissions of fugitive dust shall not exceed 5% opacity, as a 3-minute average.
	OAC rule 3745-17-07(B)	Less stringent than the opacity limitation defined above.
	OAC rule 3745-17-11	Less stringent than the mass emissions limitation required above.

2. Additional Terms and Conditions

- 2.a The 2.8 lbs/hr particulate emissions was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b This facility shall initiate an inspection and maintenance program designed to help ensure the control equipment is operating in accordance with the manufacturer's specifications. Such an I and M program shall outline the steps taken and/or the specific items checked on a routine basis to ensure proper operation of the control equipment adjoining this emissions unit.
- 2.c This facility shall initiate the in-house scrap acceptance policy, as submitted on September 1, 1999, to minimize or eliminate the potential for processing the following materials:

- i. batteries or any other lead containing materials;
- ii. transformers or capacitors containing polychlorinated biphenyls;
- iii. hazardous chemicals, paint thinners, or solvents;
- iv. fuel tanks except vehicle fuel tanks which remain on the vehicle body and have been slit, or vehicle fuel tanks which have been removed, punctured, and drained prior to processing;
- v. appliances containing refrigerants; and,
- vi. apparatus containing radioactive material.

B. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 3,840.
2. The Water Injection System flow rate shall be continuously maintained at a value of not less than 3 gallons per ton processed at all times while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the operating hours for this emissions unit.
2. The permittee shall properly install, operate and maintain equipment to continuously monitor the Water Injection System flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The Water Injection System flow rate, in gallons per ton processed, on a once per shift basis.
- b. The operating times for the control device, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit annual reports which identify any exceedances of the annual operating hours limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

2. The permittee shall also submit quarterly deviation (excursion) reports that identify all periods of time during which the Water Injection System flow rate was not maintained at or above 3 gallons per ton processed during the operation of the automobile shredder. These reports shall be submitted in accordance with Part I - General Term and Condition 2.

E. Testing Requirements

Compliance with the emission limitation in section A.1. of these terms and conditions shall be determined in accordance with the following method:

1. Emissions Limitation:

2.8 pounds of particulate emissions per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the representative emission factor 0.0315 lb particulate emissions per ton processed (from AP-42, 5th Edition, Chapter 11.19.2 for Crushed Stone Processing, Table 11.19.2-2 for Fine Crushing) by the maximum process throughput rate of 90 tons per hour.

2. Emission Limitation:

5.38 tons of particulate emissions per year.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum hourly emission rate, 2.8 lbs/hr, by the maximum annual operating hours, 3,840, and then convert pounds to tons, by dividing the result by 2000 lbs/ton.

3. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 5% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(3) using methods and procedures specified in USEPA Reference Method 9.

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Emissions Unit ID: **P901**

F. Miscellaneous Requirements

This is a modification of PTI 08-2501, and represents a change in the hours of operation limitation and the air pollution control equipment from a wet cyclonic scrubber to a Water Injection System. This modification reduces emissions of pounds per hour (from 9.26 to 2.8) and tons per year (from 8.89 to 5.38) for particulates.

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Emissions Unit ID: **P902****PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]****A. Applicable Emissions Limitations and/or Control Requirements**

1. 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>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
"Z" - Box Separator	OAC rule 3745-31-05(A)(3)	0.03 gr/dscf of exhaust gases from the splitter valve outlet; 3.5 lbs/hr and 6.72 TPY Particulate Emissions.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 5% opacity, except for any one 6-minute average in any 60 minutes not to exceed 10% opacity.
	OAC rule 3745-17-11	Less stringent than the opacity limitation required above.
		Less stringent than the mass emission limitation required above.

2. Additional Terms and Conditions

- 2.a** The 3.5 lbs/hr particulate emissions was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b** This emissions unit shall be equipped with hoods, fans, and other equipment to

ensure the particulate collection efficiency is sufficient to minimize or eliminate visible emissions of fugitive dust at the point of capture. Visible particulate emissions of fugitive dust at the point of capture shall not exceed 5% opacity at any time.

- 2.c** This facility shall initiate an inspection and maintenance program designed to help ensure the control equipment is operating in accordance with the manufacturer's specifications. Such an I and M program shall outline the steps taken and/or the specific items checked on a routine basis to ensure proper operation of the control equipment adjoining this emissions unit.

B. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 3,840.
2. The pressure drop across the cyclone shall be maintained within the range of 5.0 to 10.0 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the operating hours for this emissions unit.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the cyclone while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the cyclone on a once per shift basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which identify any exceedances of the annual operating hours limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
2. The permittee shall also submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted in accordance with Part I - General Term and Condition 2.

E. Testing Requirements

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Emissions Unit ID: **P902**

Compliance with the emission limitation in section A.1. of these terms and conditions shall be determined in accordance with the following method:

1. Emission Limitation -

0.03 gr/dscf of exhaust gases from the splitter valve outlet

Applicable Compliance Method -

If required, compliance with this mass emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

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2. Emission Limitation -

3.5 pounds of particulate emissions per hour

Applicable Compliance Method -

Compliance shall be determined by multiplying the allowable mass emission rate of 0.03 gr/dscf by the maximum flow rate of 13,742 cfm. Then convert the result, 330 gr/min, to pounds per hour by multiplying the result by 60 minutes per hour and dividing the result by 7000 grains per pound.

3. Emission Limitation -

5.43 tons of particulate emissions per year

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly emission rate, 3.5 lbs/hr, by the maximum annual operating hours, 3,840, and then convert pounds to tons, by dividing the result by 2000 lbs/ton.

4. Emission Limitation -

Visible particulate emissions shall not exceed 5% opacity, except for any one 6-minute average in any 60 minutes not to exceed 10% opacity.

Applicable Compliance Method -

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

F. Miscellaneous Requirements

This is a modification of PTI 08-2501, and represents an emission increase in pounds per hour (from 2.83 to 3.5) and tons per year (2.72 to 6.72) for particulates.