

Facility ID: 1677010437 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

[Go to Part II for Emissions Unit B001](#)

[Go to Part II for Emissions Unit F001](#)

[Go to Part II for Emissions Unit P001](#)

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1677010437 Emissions Unit ID: B001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>      |
|---|--------------------------------------|---|
| 2000 Hp diesel engine for powering the hammermill | OAC rule 3745-35-07                  | 74.9 tpy of NOx emissions as a rolling, 12-month summation    |
|   | OAC rule 3745-17-11(B)(5)            | 0.310 pound of particulates per million Btu actual heat input |
|   | OAC rule 3745-17-07                  | 20% opacity as a 6-minute average, except as provided by rule |
|   | OAC rule 3745-18-06(G)               | 0.5 pound of SO2 per million Btu actual heat input            |

**2. Additional Terms and Conditions**

- (a) None

**B. Operational Restrictions**

1. The permittee has agreed to accept limitations on diesel fuel consumption to keep the facility NOx emissions below 100 tons per year. The fuel consumption restrictions are for emissions unit B001 at this facility. The maximum annual diesel fuel usage for this emissions unit shall not exceed 84,000 gallons, based upon a rolling, 12-month summation.

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

Month(s) Maximum Allowable Cumulative Fuel Usage (gallons)

- 1 7,000
- 1-2 14,000
- 1-3 21,000
- 1-4 28,000
- 1-5 35,000
- 1-6 42,000
- 1-7 49,000
- 1-8 56,000
- 1-9 63,000
- 1-10 70,000
- 1-11 77,000
- 1-12 84,000

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

2. The quality of the oil burned in this emissions unit shall have a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.50 pound of sulfur dioxide per million Btu of actual heat input.

Compliance with the above-mentioned specification shall be determined by using the weighted average of the analytical results provided by the permittee or oil supplier for all shipments of oil during each calendar month.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain monthly records of the following information:
  - a. the fuel usage for each month; and
  - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the fuel usage.

Also, during the first 12 calendar months of operation after the issuance of this permit, the permittee shall record the cumulative fuel usage for each calendar month.
2. The permittee shall maintain as a record, on a monthly basis, copies of the oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) of each shipment of oil. The following information shall also be included with the copies of the oil supplier's analyses:
  - a. the total quantity of oil received in each shipment (gallons);
  - b. the weighted\* average sulfur dioxide emission rate (pounds of SO<sub>2</sub> per million Btu) for the oil received during each calendar month; and
  - c. the weighted\* average heat content (Btu/gallon) of the oil received during each calendar month.

\*In proportion to the quantity of oil received in each shipment during the calendar month.
3. The permittee shall require the oil supplier to collect a representative grab sample for each shipment of oil that is received by the supplier for delivery to the permittee and eventually burned in this emissions unit. The permittee shall require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month fuel usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative fuel usage levels.
2. The permittee shall submit deviation (excursion) reports which identify any monthly record that documents an exceedance of the SO<sub>2</sub> emission limit of 0.50 pound of sulfur dioxide per million Btu, along with the cause of the exceedance and an explanation of any corrective actions taken to prevent future exceedances.
3. These deviation reports shall be submitted in accordance with the requirements specified in Part 1 - General Term and Condition 3 of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 and the operational restrictions in section B of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3)

Operational Restriction:

The maximum annual fuel usage limit shall not exceed 84,000 gallons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1 above.

Emission Limitation:

74.9 tpy of NO<sub>x</sub> as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the NO<sub>x</sub> limitation will be demonstrated by using the AP-42 NO<sub>x</sub> emission factor of 4.41 pounds per mmBtu of actual fuel input. This emission factor was obtained from AP-42, 5th edition, Chapter 3, Table 3.3-2.

Multiply the NO<sub>x</sub> emission factor of 4.41 pounds per mmBtu by the heat content of the total amount of diesel fuel burned in each calendar month, divide by 2000 pounds per ton to determine the NO<sub>x</sub> emission rate in tons per month, and then add this value to the previous 11-month total for NO<sub>x</sub> emissions.

Emission Limitation:

0.310 pound of particulates per million Btu of actual heat input

Applicable Compliance Method:

Compliance with the particulates limitation will be demonstrated by using the AP-42 emission factor of 0.1 pound of particulates per million Btu of actual heat input.

The particulates emission factor was obtained from AP-42, 5th edition, Chapter 3, Table 3.4-2.

Since the units of the emission factor are already in the same units as the allowable emissions limit, no calculations are required to determine compliance.

Emission Limitation:

0.5 pound of SO2 per million Btu actual heat input

Applicable Compliance Method:

Compliance with the SO2 limitation will be demonstrated by using the AP-42 emission factor of 0.29 pound of sulfur dioxide per million Btu of actual heat input.

The sulfur dioxide emission factor was obtained from AP-42, 5th edition, Chapter 3, Table 3.3-2.

Since the units of the emission factor are already in the same units as the allowable emissions limit, no calculations are required to determine compliance.

**F. Miscellaneous Requirements**

1. The following terms and conditions constitute the federally enforceable portions of this permit, pursuant to OAC rule 3745-35-07: A, B, C, D, E, and F.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1677010437 Emissions Unit ID: F001 Issuance type: Final State Permit To Operate**

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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> |
|--|--------------------------------------|--|
| material storage piles and material handling equipment | OAC rule 3745-17-07(B)               | See A.2.a. below.  |
|  | OAC rule 3745-17-08                  | See A.2.b. below.  |

**2. Additional Terms and Conditions**

- (a) There shall be no visible emissions from any material storage pile except for a period of time not to exceed 13 minutes during any 60-minute observation period.  
 The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust as described in sections A.2.c, A.2.d and A.2.e.  
 Watering shall be conducted in such a manner as to avoid the pooling of liquids and runoff.  
 The permittee shall employ reasonably available control measures for wind erosion and for all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to use water spray to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.  
 The above-mentioned control measure shall be employed for wind erosion and for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure is necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure shall continue during any such operation until further observation confirms that use of the measure is unnecessary.

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at

each storage pile in accordance with the following frequencies:

Storage Pile Identification Minimum Load-in Inspection Frequency

upper yard weekly

lower yard weekly

2. Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

Storage Pile Identification Minimum Load-out Inspection Frequency

upper yard weekly

lower yard weekly

3. Except as otherwise provided in this section, the permittee shall perform inspections of wind erosion for each storage pile in accordance with the following frequencies:

Storage Pile Identification Minimum Inspection Frequency

upper yard weekly

lower yard weekly

4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

5. The purpose of the inspections is to determine the need for implementing the control measure specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

6. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

7. 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 measure;

c. the dates the control measure was implemented; and

d. on a calendar quarter basis, the total number of days the control measure was implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure.

The information required in C.7.d shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

**D. Reporting Requirements**

1. The permittee shall submit deviation reports that identify any of the following occurrences:

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.

2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitation in section A.2 of these terms and conditions shall be determined in accordance with the following method:  
Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3)

**F. Miscellaneous Requirements**

1. The following terms and conditions constitute the federally enforceable portions of this permit, pursuant to OAC rule 3745-35-07: A, B, C, D, E, and F.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1677010437 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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> |
|--|--------------------------------------|--|
| shredder/hammermill with two magnetic separators, and a water spray chamber to control fugitive dust | OAC rule 3745-31-05 (PTI 16-660)     | 12 lbs/hr of particulates                                |
|  | OAC rule 3745-17-07(B)               | See A.2.a below.   |
|  | OAC rule 3745-17-08                  | See A.2.b below.   |

**2. Additional Terms and Conditions**

- (a) Visible particulate emissions from any material handling operation shall not exceed 20% opacity as a 3-minute average. The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

Material Handling Operation(s) Control Measure(s)

hammermill/shredder water spray/Dust Buster Foam

separators water spray

material conveyors/transfer points use of sufficient water spray in the shredder/separator

Nothing in this section shall prohibit the permittee from employing other control measures to ensure compliance. For each material handling operation that is not adequately enclosed, the control measure identified above shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure is necessary to ensure compliance with the applicable emission limitation. Any required implementation of the control measure shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure is unnecessary. Implementation of the above-mentioned control measure in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

**B. Operational Restrictions**

1. The permittee shall ensure that the gas tanks and batteries have been removed from all vehicles prior to being put into the hammermill/shredder.
2. When using water spray, the water flow rate shall be continuous and sufficient to minimize or eliminate emissions of fugitive dust.

**C. Monitoring and/or Record Keeping Requirements**

1. Except as otherwise provided in this section, for material handling and processing operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

Material Handling Operation(s) Minimum Inspection Frequency

shredder/hammermill daily when in operation

magnetic separators daily when in operation

conveyors/transfer points daily when in operation

2. The above-mentioned inspections shall be performed during a time which is representative of normal operating conditions.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
  - c. the dates the control measure(s) was (were) implemented; and
  - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in C.4.d shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

**D. Reporting Requirements**

1. The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency; and
  - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
12 lbs/hr of particulates  
Applicable Compliance Method:  
Compliance with the particulate limitation shall be demonstrated by using the emission factor of 1.4773 pounds of particulates per hour of operation for the shredder and 0.7552 pound per hour for each separator. The total emissions from the shredder and separators is 2.99 pounds of particulates per hour.  
The particulate emission factors were obtained by taking the average of nine PM emissions test conducted by The Insitute of Scrap Recycling Industries (ISRI) on similar schredders and separators.  
Since the units of the emission factors are already in the same units as the allowable emissions limit, no calculations are required to determine compliance.  
Emission Limitation:  
20% opacity as a 3-minute average  
Applicable Compliance Method:  
Compliance with the visible emission limitation for the material handling operation(s) identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

**F. Miscellaneous Requirements**

1. The following terms and conditions constitute the federally enforceable portions of this permit, pursuant to OAC rule 3745-35-07: A, B, C, D, E, and F.