

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 B002](#)
- [Go to Part II for Emissions Unit B003](#)
- [Go to Part II for Emissions Unit F001](#)
- [Go to Part II for Emissions Unit P001](#)

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Facility ID: 1677010437 Emissions Unit ID: B002 Issuance type: Final State Permit To Operate

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**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>
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 (NOx) 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) NOx and CO below major source emission thresholds.	OAC rule 3745-31-05(A)(3) PTI # 16-02380	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).
	OAC rule 3745-17-11(B)(5)(b)	0.062 pound of PE per million Btu actual heat input for a stationary large internal combustion engine See A.2.b below.
	OAC rule 3745-21-08(B) OAC rule 3745-21-07(B) OAC rule 3745-17-07(A) OAC rule 3745-23-06(B)	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).
	OAC rule 3745-31-05(C) (to avoid moderate nonattainment program requirements); OAC rule 3745-35-07(B) (to avoid Title V program requirements)	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.

**2. Additional Terms and Conditions**

- (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.  
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.

OAC Chapter 3745-18 does not establish an SO<sub>2</sub> emissions limitation for this emissions unit because the emissions unit burns only natural gas.

The emissions of NO<sub>x</sub> 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.

Compliance with the annual facility emission limitations for NO<sub>x</sub> 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.

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 Record Keeping 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. The rolling, 12-month summation of the monthly facility natural gas usage figures.
3. The permittee shall maintain monthly records of the following information:
  - a. The monthly facility emissions (tons) for NO<sub>x</sub> and CO, based upon a NO<sub>x</sub> emission factor and a CO emission factor each equal to 1.82 tons/million cubic feet of natural gas.
  - b. The rolling, 12-month summation of the monthly facility emissions (tons) for each of NO<sub>x</sub> and CO.

**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. 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<sub>x</sub> 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:  
Emission Limitation: 1% opacity of visible particulate emission, 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.

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).

Emission Limitation: 50.0 pounds/hour NO<sub>x</sub>

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 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.  
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.  
Emission Limitations: 99.0 tons/year of NOx 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. 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).
3. Note: This facility, which consists of B002, B003, F001 (material handling/storage piles), P001 (shredder/separator), and a de 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 (SO2), volatile organic compound (VOC), and hazardous air pollutant (HAP) emissions.

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Facility ID: 1677010437 Emissions Unit ID: B003 Issuance type: Final State Permit To Operate

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**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>
B003 (Engine "B") 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	OAC rule 3745-31-05(A)(3) PTI # 16-02380	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

(NOx) 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) NOx and CO below major source emission thresholds.

rules 3745-21-08(B), 3745-21-07(B), 3545-31-05(C) and 3745-35-07(B).

OAC rule 3745-17-11(B)(5)(b)

0.062 pound of PE per million Btu actual heat input for a stationary large internal combustion engine  
See A.2.b below.

OAC rule 3745-21-08(B)

OAC rule 3745-21-07(B)

OAC rule 3745-17-07(A)

OAC rule 3745-23-06(B)

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).

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

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.

**2. Additional Terms and Conditions**

- (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.

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.

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

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.

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.

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 Record Keeping 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. The rolling, 12-month summation of the monthly facility natural gas usage figures.
- 3. The permittee shall maintain monthly records of the following information:
  - a. The monthly facility emissions (tons) for NOx and CO, based upon a NOx emission factor and a CO emission factor each equal to 1.82 tons/million cubic feet of natural gas.
  - b. The rolling, 12-month summation of the monthly facility emissions (tons) for each of NOx and CO.

**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. 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 NOx 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:  
Emission Limitation: 1% opacity of visible particulate emission, 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.  
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).  
Emission Limitation: 50.0 pounds/hour NOx

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

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

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.  
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.  
Emission Limitations: 99.0 tons/year of NOx 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. 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).
3. Note: This facility, which consists of B002, B003, F001 (material handling/storage piles), P001 (shredder/separator), and a de 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<sub>2</sub>), volatile organic compound (VOC), and hazardous air pollutant (HAP) emissions.

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

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**Part II - Special Terms and Conditions**

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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(B)	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 daily

lower yard daily

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 daily

lower yard daily

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 daily

lower yard daily

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 daily

lower yard daily

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. Note: This facility, which consists of B002, B003, F001 (material handling/storage piles), P001 (shredder/separator), and a de 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<sub>2</sub>), volatile organic compound (VOC), and hazardous air pollutant (HAP) emissions.

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

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**Part II - Special Terms and Conditions**

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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 pounds of Particulate Emissions PE per hour
	OAC rule 3745-17-07(B)	See A.2.a below.
	OAC rule 3745-17-08(B)	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).

**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. Note: This facility, which consists of B002, B003, F001 (material handling/storage piles), P001 (shredder/separator), and a de 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<sub>2</sub>), volatile organic compound (VOC), and hazardous air pollutant (HAP) emissions.