



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, OH 43216-1049

7/29/2008

JAMES SHOLLENBERGER
OMNISOURCE CORP
2453 HILL AVE
TOLEDO, OH 43607

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0448011189
Permit Number: 04-01497
Permit Type: Admin mod
County: Lucas

Certified Mail

| | |
|----|----------------------|
| No | TOXIC REVIEW |
| No | PSD |
| No | SYNTHETIC MINOR |
| No | CEMS |
| No | MACT |
| No | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | MAJOR NON-ATTAINMENT |
| No | MODELING SUBMITTED |

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
TDES; Michigan; Indiana; Canada

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
OMNISOURCE CORP

Issue Date: 7/29/2008
Permit Number: 04-01497
Permit Type: Admin mod
Permit Description: Roadway modifications
Facility ID: 0448011189
Facility Location: OMNISOURCE CORP
5000 N. DETROIT AVE,
TOLEDO, OH 43612

Facility Description: Recyclable Material Merchant Wholesalers

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Mary Lehman-Schmidt at Toledo Department of Environmental Services, 348 South Erie Street or (419)936-3015. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

OmniSource Corporation operates a metal recycling center at 5130 North Detroit Ave. in Toledo, Ohio. A permit to install application was submitted on December 10, 2007 for a new shredder with modifications to the existing permits. The plant is comprised of various material handling operations, a hammermill, storage piles, paved and unpaved roadways, torching operations, surface coating operations.

3. Facility Emissions and Attainment Status:

Omni Source currently operates as a synthetic minor source for all pollutants with restrictions on monthly fuel usage maintaining minor source emission status for CO for two natural gas fired engines used to power an existing shredder. After replacement of the existing shredder by a electric powered shredder, the CO will no longer be a concern, however the new unrestricted facility-wide emissions of VOC would exceed 100 tons per year. With a restriction of 720,000 tons of scrap processed per year, total facility emissions will be minor for all criteria pollutants. Lucas County has the following attainment status:

| Pollutants | Air Quality Description |
|--------------------|-------------------------|
| Particulate Matter | Unclassified |
| PM10 | Attainment |
| Sulfur Dioxide | Attainment |
| Organic Compounds | Attainment |
| Nitrogen Oxides | Attainment |
| Carbon Monoxide | Attainment |
| Lead | Unclassified |

4. Source Emissions:

This permit is one of three permits related to this project and is for the administrative modification of emissions unit F001, roadways and parking lots. Total federally enforceable potential to emit from this emissions unit will be 1.96 tons of fugitive particulate emissions (PE) per year and 0.54 ton of fugitive particulate matter emissions less than or equal to 10 microns in diameter (PM10)



Project Emission Summary

| tpy | Allowable Emissions | | |
|--------------|---------------------|-------|-------|
| | PE | PM10 | VOC |
| F001 | 1.96 | 0.54 | 0.00 |
| | | | |
| F002 | 3.91 | 1.30 | 0.00 |
| F003 | 24.60 | 8.95 | 0.00 |
| F004 | 4.99 | 4.99 | 0.00 |
| F005 | 0.86 | 0.30 | 88.92 |
| K001 | 0.01 | 0.01 | 3.66 |
| Permit total | 36.33 | 16.09 | 92.58 |

Fugitive emissions from this facility are not included in the calculations for major source applicability.

PSD/Title V Emissions (stack emissions only)

| Tpy | Allowable Emissions | | |
|-----------------|---------------------|------|-------|
| | PE | PM10 | VOC |
| F003 (Z-box) | 4.93 | 1.73 | 0.00 |
| F005 (shredder) | 0.86 | 0.30 | 88.92 |
| K001 | 0.01 | 0.01 | 3.66 |
| Total | 5.80 | 2.04 | 92.58 |

5. Conclusion:

OmniSource is not an existing major source for PSD or Title V purposes. With a throughput restriction, and enforceable control requirements, this project increases allowable emissions of PE by 30.92 tons per year, PM10 by 16.09 tons per year and VOC by 92.58 tons per year. These increases do not trigger the requirements for PSD review or Title V applicability.

6. Please provide additional notes or comments as necessary:

Description

OmniSource Corporation operates a metal recycling center at 5130 North Detroit Ave. in Toledo, Ohio. This facility was permitted under PTI 04-957 issued May 3, 1995 with sources identified as



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: 04-01497

Facility ID: 0448011189

Effective Date: To be entered upon final issuance

F001 roadways and parking lots, F002 storage piles and P002 & P003 natural gas fired engines #1 and #2. A permit to install application was submitted on December 10, 2007 for a new shredder with potential modifications to the existing permits.

Omni Source currently operates as a synthetic minor for CO with restrictions on monthly fuel usage for two natural gas fired engines used to power an existing shredder. The plant is comprised of various material handling operations, a hammermill, storage piles, paved and unpaved roadways, torching operations, surface coating operations. Controls are watering, chemical suppression and enclosure. Omni Source is updating the salvage yard to operate as a more efficient facility. The existing hammermill along with the material handling equipment will be replaced. The two internal combustion engines are being removed from the facility as the new shredder is to be electric motor powered. Both internal combustion engines will be decommissioned and removed from the yard. The facility will no longer be subject to synthetic minor federally enforceable limits for CO. Because the modifications to this facility include altering traffic patterns and constructing new roadways, this permit may involve a modification to the emission units of PTI 04-0957 and 04-1061 (which itself was a modification to PTI 04-0957). The synthetic minor limitation on the engines used to power the shredder is considered to be adequate to have limited all particulate emissions to less than 250 tpy and therefore this facility will not be considered to be an existing major source for PSD purposes.

Engineering guide 25 lists the following recommended break down for the sources located at a metal salvage operation:

- FXXX - All roadways and parking lots (F001).
- FXXX - All torching stations (F004).
- FXXX - One permit per shredder (F005).
- FXXX - Magnetic separation and conveying of nonferrous material onto open storage piles, conveying of ferrous material onto open storage piles and ferrous material handling and loadout (F003)
- FXXX - All ferrous scrap stockpiles and nonferrous material stockpiles (if stored on-site) (F002)

Because metal recycling is not a listed source of pollutants in one of the 28 PSD source categories, fugitive emissions will not be counted towards Title V applicability.

BAT analysis

Existing emissions units/allowable emissions

PTI 04-0957 addressed the following:

| | | |
|------|------------------|------------------------------------|
| P002 | 1750 hp engine | to be withdrawn |
| P003 | 1750 hp engine | to be withdrawn |
| F001 | roadways | 0.014 lb PM/hr (paved) |
| | and parking lots | no VE except 1 minute/hr (paved) |
| | | 1.21 lb PM/hr (unpaved) |
| | | no VE except 3 minute/hr (unpaved) |
| | | 5.34 tpy PM |



F002 storage piles 0.0171lb PM/hr
 no VE except 1 minute/hr
 0.07 tpy PM

PTI 04-1061 addressed P002 and P003 only and will be withdrawn

Proposed emissions units/allowable emissions

F001 - roadways and parking lots

Unpaved

OmniSource submitted the following calculations based on the AP-42 Chapter 13.2-2 dated 11/06 for unpaved roads indicating annual emissions of 2.30 tpy PM10 and 10.08 tpy PE. Our calculations will follow their permit application utilizing the formulas from AP-42, Chapter 13, section 2.2, Equations (1a) and (2), rev. 11/06:

$$E = \{k [(s/12)^a][(W/3)^b]\} [(365-P)/365]$$

where

E = annual emissions factor (in lb/VMT)

a = 0.9 PM10, 0.7 PE

b = 0.45

k = particle size multiplier for PE = 4.9 lb/vmt

particle size multiplier for PM10 = 1.5 lb/vmt

s = road surface silt = 10% (provided by OmniSource)

W = average vehicle weight = 2 tons for light duty gasoline
 = 15 tons for heavy duty diesel
 = 15 tons average

P = number of wet days = 138 (Figure 13.2.2-1)

$$E = 5.53 \text{ lb PE/vmt}$$

$$E = 1.63 \text{ lb PM10/vmt}$$

In their EAC form, OmniSource reported for unpaved roads 69 miles traveled per year by light duty gasoline and 11205.5 miles traveled per year by heavy duty diesel. AP-42 on page 13.2.2-6 states: "It is important to note that the vehicle-related source conditions refer to the average weight, speed, and number of wheels for all vehicles traveling the road. For example, if 98 percent of traffic on the road are 2-ton cars and trucks while the remaining 2 percent consists of 20-ton trucks, then the mean weight is 2.4 tons. More specifically, Equations 1a and 1b are not intended to be used to calculate a separate emission factor for each vehicle class within a mix of traffic on a given unpaved road. That is, in the example, one should not determine one factor for the 2-ton vehicles and a second factor for the 20-ton trucks. Instead, only one emission factor should be calculated that represents the "fleet" average of 2.4 tons for all vehicles traveling the road.



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Presumably the VMT estimates represented an annual throughput restriction of 720,000 tons of scrap per year. VMT in PTI 04-0965 was estimated at 6500 miles per year.

Uncontrolled emissions (unpaved)

$$PE = (5.53 \text{ lb/vmt})((69 \text{ mi/yr}) + (11,205.50 \text{ mi/yr}))(1 \text{ t}/2000 \text{ lb}) = 31.17 \text{ tpy}$$

$$PM_{10} = (1.63 \text{ lb/vmt})((69 \text{ mi/yr}) + (11,205.50 \text{ mi/yr}))(1 \text{ t}/2000 \text{ lb}) = 9.19 \text{ tpy}$$

Controlled emissions (unpaved)

Ohio EPA has established a general permit for unpaved roadways with VMT less than 120,000 miles per year. Utilizing the terms and conditions of this permit as the basis of our BAT, we will allow a 95% level of control for proper operation of control measures. Annual emissions limitations become: $(31.17 \times 0.05 =) 1.56 \text{ tpy PE}$ and $(9.19 \times 0.05 =) 0.46 \text{ tpy PM}_{10}$

Paved

OmniSource identifies 0.92 miles of paved roadway, but fails to offer emissions estimates for these areas. Our calculations will follow their permit application utilizing the formulas from AP-42 Section 13.2.1 Paved Roads dated 12/03 equation (2) as follows:

$$E = \{k [(sL/2)^{0.65}][(W/3)^{1.5} - C] [1 - (P/4N)]\}$$

where

E = annual emissions factor

k = particle size multiplier for PE = 0.082 lb/vmt

particle size multiplier for PM₁₀ = 0.016 lb/vmt

sL = road surface silt = 9.7 g/sqm (Table 13.2.1-4, iron and steel production)

W = average vehicle weight = 2 tons for light duty gasoline

= 15 tons for heavy duty diesel

= 15 tons average

C = exhaust brake&tire wear = 0.00047 lb/vmt (Table 13.2.1-2)

P = number of wet days = 138 (Figure 13.2.1-2)

N = number of days in period = 365

$$E = 2.32 \text{ lb PM}_{10}/\text{vmt}$$

$$E = 0.45 \text{ lb PM}_{10}/\text{vmt}$$

In their EAC form, OmniSource reported for paved roads 146.5 miles traveled per year by light duty gasoline and 6825.9 miles traveled per year by heavy duty diesel. (Presumably the VMT estimates represented an annual throughput restriction of 720,000 tons of scrap per year.)

Uncontrolled emissions (paved)

$$PE = (2.32 \text{ lb/vmt})((146.5 \text{ mi/yr}) + (6825.9 \text{ mi/yr}))(1 \text{ t}/2000 \text{ lb}) = 8.09 \text{ tpy}$$

$$PM_{10} = (0.45 \text{ lb/vmt})((146.5 \text{ mi/yr}) + (6825.9 \text{ mi/yr}))(1 \text{ t}/2000 \text{ lb}) = 1.57 \text{ tpy}$$



Controlled emissions (paved)

Ohio EPA has established a general permit for paved roadways with VMT less than 40,000 vehicle miles traveled per year and a silt content less than or equal to 120 g/sqm. Utilizing the terms and conditions of this permit as the basis of our BAT, we will allow a 95% level of control for proper operation of control measures. Annual emissions limitations become: $(8.09 \times 0.05 =) 0.40$ tpy PE and $(1.57 \times 0.05 =) 0.08$ tpy PM10

Roadways and parking lots F001

| | PE, tpy | | PM10, tpy | |
|-----------------------|------------------|-------|------------------|------|
| | SIP ¹ | BAT | SIP ¹ | BAT |
| unpaved | 15.60 | 1.56 | 4.60 | 0.46 |
| paved | 1.60 | 0.40 | 0.32 | 0.08 |
| permit allowable | 17.20 | 1.96 | 4.92 | 0.54 |
| OmniSource allowable | | 10.08 | | 2.30 |
| PTI 04-0957 allowable | | 5.34 | | - |

¹ SIP control requirements are credited as 80% effective for paved areas and 50% effective for unpaved areas

At SIP control levels, an increase in allowable PE has occurred, the unit exceeds 10 tpy PE and OAC rule 3745-31-05(A)(3) (BAT) would apply. At BAT levels, no increase in allowable emissions has occurred, no Chapter 31 modification has occurred. F001 will be revised as a company requested administrative modification with the new calculated emissions limitations (BAT level controls) included as voluntary OAC rule 3745-31-05(D) emissions limitations for both PE and PM10.

Applicable requirements are:

OAC rule 3745-17-07(B)(4) ... there shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty minute observation period, as determined in accordance with paragraph (B)(4) of rule 3745-17-03 of the Administrative Code.

OAC rule 3745-17-07(B)(5) ... there shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed thirteen minutes during any sixty minute observation period, as determined in accordance with paragraph (B)(4) of rule 3745-17-03 of the Administrative Code.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

**Air Pollution Permit-to-Install and Operate
for
OMNISOURCE CORP**

Facility ID: 0448011189
Permit Number: 04-01497
Permit Type: Admin mod
Issued: 7/29/2008
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
OMNISOURCE CORP

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Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: 04-01497

Facility ID: 0448011189

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0448011189
Application Number(s): A0005480
Permit Number: 04-01497
Permit Description: Roadway modifications
Permit Type: Admin mod
Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 7/29/2008
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

OMNISOURCE CORP
5000 N. DETROIT AVE
TOLEDO, OH 43612

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: 04-01497

Facility ID: 0448011189

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: 04-01497

Permit Description: Roadway modifications

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

| | |
|-----------------------------------|--------------------------|
| Emissions Unit ID: | F001 |
| Company Equipment ID: | Roadways & Parking Areas |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: 04-01497

Facility ID: 0448011189

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Toledo Department of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

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14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



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B. Facility-Wide Terms and Conditions



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1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



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C. Emissions Unit Terms and Conditions



1. F001, Roadways & Parking Areas

Operations, Property and/or Equipment Description:

Plant roadways and parking areas, paved and unpaved, modification

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|--|---|
| paved roadways and parking areas | | |
| a. | OAC rule 3745-31-05(A)(3) established in PTI 04-957 issued May 3, 1995 | no visible PE except for one minute during any 60-minute period best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see b)(2)a. through b)(2)h. |
| b. | OAC rule 3745-17-07(B)(4) | the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) |
| c. | OAC rule 3745-17-08(B), (B)(8), (B)(9) | the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|--|--|
| | | see (2)h. |
| unpaved roadways and parking areas | | |
| d. | OAC rule 3745-31-05(A)(3) established in PTI 04-957 issued May 3, 1995 | no visible PE except for three minutes during any 60-minute period best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see b)(2)a. through b)(2)h. |
| e. | OAC rule 3745-17-07(B)(5) | the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) |
| f. | OAC rule 3745-17-08(B), (B)(2) | the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) see (2)h. |
| paved and unpaved roadways and parking areas | | |
| g. | OAC rule 3745-31-05(D) | particulate emissions (PE) shall not exceed 1.96 tons per year particulate matter emissions less than or equal to 10 microns in diameter (PM10) shall not exceed 0.54 ton per year see (2)i. |

(2) Additional Terms and Conditions

- a. Permit to Install and Operate 04-01497 is an administrative modification of the terms contained in PTI 04-957 issued May 3, 1995 for this emissions unit. The provisions of OAC rule 3745-31-05(A)(3)(b) do not apply, since PTI 04-957 was issued prior to August 3, 2006.
- b. The permittee shall employ best available control measures on all paved roadways and parking areas 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 treat the paved roadways and parking areas by good housekeeping and sweeping at sufficient treatment



frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- c. The permittee shall employ best available control measures on all unpaved roadways and parking areas 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 treat the unpaved roadways and parking areas with suitable dust suppression chemicals or by the reapplication of aggregate at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- e. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- f. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- g. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- h. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.
- i. These emission limitations take into account a voluntary restriction of 720,000 tons per year throughput of materials in this emissions unit measured as the rolling, 12-month total quantity of material shredded and made enforceable based on a maximum of 720,000 tons per year of material shredded at emissions unit F005 (Permit Number: P0103630).



- c) Operational Restrictions
 - (1) None.

- d) Monitoring and/or Recordkeeping Requirements
 - (1) Except as otherwise provided in this section, the permittee shall perform daily inspections of all roadways and parking areas.

 - (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or 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.

 - (3) The permittee may, upon receipt of written approval from the appropriate field office (having jurisdiction over the new site), modify the abovementioned 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, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in (4)d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

- e) Reporting Requirements
 - (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the emission limitations in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

No visible emissions except for one minute per hour from paved roadways and parking lots.

Applicable Compliance Method:

Compliance with the visible emission limitation for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 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)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

b. Emission Limitation:

No visible emissions except for three minutes per hour from unpaved roadways and parking lots.

Applicable Compliance Method:

Compliance with the visible emission limitation for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 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)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

c. Emission Limitation:

PE shall not exceed 1.96 tons per year

Applicable Compliance Method:

Compliance with fugitive PE limitations shall be determined by using the emission factor equations in Section 13.2.1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for paved roadways and the emission factor equations in Section 13.2.2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for unpaved roadways. Should further updates in AP-42 occur, the most current equations shall be used. These emission limits were based on a maximum of 720,000 tons per year of material shredded at emissions unit F005 (Permit Number: P0103630), and a 95% effective control.

d. Emission Limitation:

PM10 emissions shall not exceed 0.54 ton per year



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Applicable Compliance Method:

Compliance with fugitive PM10 limitations shall be determined by using the emission factor equations in Section 13.2.1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for paved roadways and the emission factor equations in Section 13.2.2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for unpaved roadways. Should further updates in AP-42 occur, the most current equations shall be used. These emission limits were based on a maximum of 720,000 tons per year of material shredded at emissions unit F005 (Permit Number: P0103630), and a 95% effective control.

g) **Miscellaneous Requirements**

(1) None.