



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184  
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049  
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: P0103626  
Permit Type: Chapter 31 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*  
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: P0103626

Permit Type: Chapter 31 mod

Permit Description: Loading of material onto storage piles, equipment traffic in storage area, wind erosion of pile surfaces and ground areas around piles, and load-out of material for shipment

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](http://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 Chapter 31 modification of emissions unit F002, operations of ferrous and nonferrous storage piles. Total federally enforceable potential to emit from this emissions unit will be 3.91 tons of fugitive particulate emissions (PE) per year and 1.30 tons of fugitive particulate matter emissions less than or equal to 10 microns in diameter (PM10)



State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103626

**Facility ID:** 0448011189

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

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 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.



State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103626

**Facility ID:** 0448011189

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

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 and parking lots	0.014 lb PM/hr (paved) 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

35 assorted storage piles have been indicated in the permittee's application, occupying a storage area of approximately 1.5 acres. OmniSource identified these storage piles to be free of particulate emissions, although PTI 04-957 assigned a limitation of 0.07 tpy PE. Total dust emissions from the operation of storage piles result from several distinct source activities within the storage cycle: loading of material onto storage piles, equipment traffic in storage area, wind erosion of pile surfaces and ground areas around piles, and load-out of material for shipment (Reasonable available control measures (RACM) from Ohio EPA's document dated September 1980). OmniSource identifies the sole means of control to be minimizing drop heights and further states that due to the metallic nature of the materials being stored, the storage piles should not cause fugitive emissions. To the extent that the piles are comprised of cleaned metals this assumption should be valid, however it may be assumed that certain materials, such as "fluff", may require additional treatment if left in open storage piles and allowed to dry. Since a visible emissions test will be included in the permit we will accept minimized drop heights as BAT with the provision that additional actions or dust control measures (typically watering, wind blocking structures or tarps) may be required for some storage piles based on VE observations to be included in the permit.

loading of material onto storage piles

The materials being loaded into storage piles are typically being dropped from a short height from belts or conveyors. Due to the non-friable nature and high moisture content of the materials produced by the shredding process, emissions of fugitive dust from this operation are anticipated to be small. OmniSource submitted calculations for material handling based on factors determined in AP-42 Chapter 11.19, Table 11.19.2-2, dated 8/04 which may account for the storage pile load-in emissions (as a conveyor transfer point).

For our purposes an estimate of load-in emissions will be calculated utilizing Table 11.19.2-2 (English Units). EMISSION FACTORS FOR CRUSHED STONE PROCESSING OPERATIONS with a conveyor transfer point emission factors of 0.0030 lb/ton PE and 0.0011 lb/ton PM10 utilized as a surrogate for the average material being loaded into storage. At a maximum capacity of 720,000 tons of scrap per year:

uncontrolled

PE 720,000 ton/yr (0.0030 lb/ton)(1 ton/2000 lb) = 1.08 ton/yr  
 PM10 720,000 ton/yr (0.00110 lb/ton)(1 ton/2000 lb) = 0.40 ton/yr

Reasonable Available Control Measures (RACM)

Reasonable available control measures (RACM) from Ohio EPA's document (September 1980) list efficiencies from 75% to 90% for watering. Using 85%:

controlled (RACM)

PE 720,000 ton/yr (0.0030 lb/ton)(1-0.85)(1 ton/2000 lb) = 0.16 ton/yr



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103626

**Facility ID:** 0448011189

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

$$\text{PM10} \quad 720,000 \text{ ton/yr} (0.00110 \text{ lb/ton})(1-0.85)(1 \text{ ton}/2000 \text{ lb}) = 0.06 \text{ ton/yr}$$

With a BAT level of control for minimized drop height and adequate moisture (95% for maintaining no visible particulate emissions except for a period of time not to exceed 1 minute during any 60-minute period):

controlled (BAT)

$$\text{PE} \quad 720,000 \text{ ton/yr} (0.0030 \text{ lb/ton})(1-0.95)(1 \text{ ton}/2000 \text{ lb}) = 0.05 \text{ ton/yr}$$

$$\text{PM10} \quad 720,000 \text{ ton/yr} (0.00110 \text{ lb/ton})(1-0.95)(1 \text{ ton}/2000 \text{ lb}) = 0.02 \text{ ton/yr}$$

Equipment traffic in storage area:

For emissions from equipment traffic (trucks, front-end loaders, dozers, etc.) traveling between or on piles, the RACM guide recommends that the equations for vehicle traffic on unpaved surfaces be used. For vehicle travel between storage piles, the silt value(s) for the areas among the piles (which may differ from the silt values for the stored materials) should be used.

PTE for the unpaved roadways is based on AP-42 Section 13.2.2 Unpaved Roads dated 12/03 equations (1a) and (2) as follows:

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

where

E = annual emissions factor

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 = 6.4% (Table 13.2.2-1) x 2 (guess) = 12.8%

W = average vehicle weight =  $[8 + (8 + 4)] \div 2 = 10$  tons estimated average for loader, mobile crane and forklift

C = exhaust brake&tire wear = 0.00047 lb/vmt (Table 13.2.2-4)

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

$$E = 5.48 \text{ lb PE/vmt}$$

$$E = 1.70 \text{ lb PM10/vmt}$$

At 5 round trips per 20 ton load (guess), 200 ft/round trip (guess) and 720,000 tons of total materials per year loaded out

$$720,000 \text{ t/yr} (2)(5 \text{ trips}/20 \text{ t}) (200 \text{ ft}/\text{trip}) (\text{mi}/5280 \text{ ft}) = 13,600 \text{ vmt/yr}$$

$$\text{Uncontrolled PTE} = 5.48 \text{ lb PE/vmt} (13,600 \text{ vmt/yr}) \div 2000 \text{ lb/T} = 37.26 \text{ tpy PE}$$

$$= 1.70 \text{ lb PM10/vmt} (13,600 \text{ vmt/yr}) \div 2000 \text{ lb/T} = 11.56 \text{ tpy PM10}$$



The permittee proposed no dust control in their application. The most reasonable control for these emissions is by watering the areas between the storage piles. Using the assumed control efficiency from Ohio EPA's RACM document (September 1980); 50% for watering of unpaved areas:

$$\begin{aligned} \text{RACM Controlled PTE} &= 37.26 \text{ tpy PE } (1 - 0.50) = 18.63 \text{ tpy as PE} \\ &= 11.56 \text{ tpy PM}_{10} (1 - 0.50) = 5.78 \text{ tpy as PM}_{10} \end{aligned}$$

Following the logic of the general permits for roadways and parking lots, to take advantage of 95% control, it will be necessary to provide sufficient water to prevent the emissions of fugitive dust at the BAT level of 1 minute per hour.

$$\begin{aligned} \text{BAT Controlled PTE} &= 37.26 \text{ tpy PE } (1 - 0.95) = 1.86 \text{ tpy as PE} \\ &= 11.56 \text{ tpy PM}_{10} (1 - 0.95) = 0.58 \text{ tpy as PM}_{10} \end{aligned}$$

Wind erosion emissions:

Utilizing the Ohio EPA 9/80 RACM guide procedures from Section 2.1.2, losses for aggregate storage piles may be estimated as:

$$\text{Wind erosion emission factor} = 0.05(S/1.5)(D/90)(d/235)(f/15) \quad \text{Equation 4}$$

where: S = 2, silt content from Table 2.1.2-2 for slag or limestone  
D = 14 days, duration of material in storage, estimate  
d = 229 number of dry days per year, Figure 2.1.2-2  
f = 30, percent of time mean wind speed exceeds 12 mph, application

$$EF = 0.05(2/1.5)(14/90)(229/235)(30/15) = 0.02 \text{ lb/ton}$$

Uncontrolled wind erosion PTE emissions

$$\begin{aligned} E &= 0.02 \text{ lb/ton} \times 720,000 \text{ tons/yr} \times \text{ton}/2000 \text{ lb} \\ E &= 7.20 \text{ ton/yr as PE} \end{aligned}$$

PM10 may be estimated at 35% of the PE emissions AP42 Section 13.2.4.

$$7.20 \text{ ton/yr } (35\%) = 2.52 \text{ tpy PM}_{10}$$

Controlled wind erosion PTE emissions

Many of the storage piles will consist of non-friable materials, as indicated in the selection of as the "2" silt content, however the piles consisting of "fluff" may require additional control during windy or dry periods. VE observations will confirm the need for watering.

RACM is stated as 30% effective control

$$E = 7.2 \text{ tons/yr } (1-0.30) = 5.11 \text{ tons PE/yr (BAT)}$$



State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103626

**Facility ID:** 0448011189

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

$$E = 5.11 \text{ tons PE/yr (0.35)} = 1.79 \text{ tons PM}_{10}/\text{yr (BAT)}$$

To take advantage of a BAT level 75% control factor, it would be necessary to provide sufficient water to the piles to prevent the emissions of fugitive dust, which may require watering multiple times a day during hot periods, dry periods and, windy days.

$$E = 7.2 \text{ tons/yr (1-0.75)} = 1.80 \text{ tons PE/yr (BAT)}$$

$$E = 1.80 \text{ tons PE/yr (0.35)} = 0.63 \text{ tons PM}_{10}/\text{yr (BAT)}$$

Loading of material out of the storage piles:

Load-out of aggregate storage piles by front end loader is discussed in AP-42 Section 13.2.4 as:

$$EF = k(0.0032)(U/5)^{1.3} \div (M/2)^{1.4}$$

where: k = particle size multiplier = 1.00 for PE & 0.35 for PM<sub>10</sub>

U = mean wind speed, 9.5 mph (typical)

M = 4.8%, the maximum range of moisture for use of this formula

$$EF = 1.00 (0.0032)(9.5/5)^{1.3} \div (4.8/2)^{1.4}$$

$$EF = 0.0022 \text{ lb PE/ton}$$

$$EF = 0.0022 \text{ lb PE/ton (0.35)} = 0.0008 \text{ lb PM}_{10}/\text{ton}$$

$$\text{Uncontrolled load-out PTE} = 720,000 \text{ t/yr } ((0.0022 \text{ lb/t}) \div (2000 \text{ lb/t}))$$

$$= 0.79 \text{ ton PE/yr}$$

$$= 0.79 \text{ ton PE/yr (0.35)} = 0.28 \text{ ton PM}_{10}/\text{yr}$$

The load-out of piles consisting of dried materials may require additional control during windy or dry periods. VE observations will confirm the need for watering.

Reasonable available control measures (RACM) from Ohio EPA's document (September 1980) describe control efficiencies achieved by watering the storage piles as "low". Using 50%:

controlled (RACM)

$$\text{PE} \quad 0.79 \text{ ton PE/yr (1-0.50)} = 0.40 \text{ ton/yr}$$

$$\text{PM}_{10} \quad 0.28 \text{ ton PM}_{10}/\text{yr (1-0.50)} = 0.14 \text{ ton PM}_{10}$$

To take advantage of a 75% control BAT, it will be necessary to provide sufficient water to dry material being transferred to prevent the emissions of fugitive dust.

$$\text{Controlled load-out PTE (BAT)} = 0.79 \text{ ton PE/yr (1-0.75)} = 0.20 \text{ ton/yr}$$

$$= 0.28 \text{ ton PM}_{10}/\text{yr (1-0.75)} = 0.07 \text{ ton PM}_{10}/\text{yr}$$



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103626

**Facility ID:** 0448011189

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

Applicable requirements are:

OAC rule 3745-17-07 (B)(6) no visible particulate emissions except for a period of time not to exceed thirteen minutes during any sixty-minute observation

OAC rule 3745-17-08 (B), (B)(6) reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust  
the periodic application of water or other suitable dust suppression chemicals, the installation of storage silos, bins or other enclosed structures, or the use of canvas or other suitable coverings, for all materials stockpiles and stockpiling operations

OAC rule 3745-31-05(A)(3)(b) 3.91 ton PE/yr  
1.30 ton PM10/yr  
no visible particulate emissions except for a period of time not to exceed one minute during any sixty-minute observation

Total particulate emissions from the storage piles = (load-in + equipment traffic + wind erosion + load-out)

Tons per year of particulate	uncontrolled PE PTE	uncontrolled PM10 PTE	with SIP restrictions		with BAT restrictions	
			controlled PE	controlled PM10	controlled PE	controlled PM10
load-in	1.08	0.40	0.16	0.06	0.05	0.02
equipment traffic	37.26	11.56	18.63	5.78	1.86	0.58
wind erosion	7.20	2.52	5.11	1.79	1.80	0.63
load-out	0.79	0.28	0.40	0.14	0.20	0.07
total	46.33	14.76	24.30	7.77	3.91	1.30
PTI 04-957	-	-	-	-	0.07	-

Because the allowable emissions of particulate have increased, this is considered a Chapter 31 modification. Since the SIP controlled total emissions of PE are greater than 10, BAT is applicable, however due to SB265 the company has the option to apply BAT level controls via a voluntary OAC rule 3745-31-05(D) limitation. SB265 does apply to PM10 which does not require BAT, however since the controls for BAT level PE will result in additional control for PM10, OAC rule 3745-31-05(D) will be used to assign the more restrictive BAT level emissions restriction.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103626

**Facility ID:** 0448011189

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

**Summary (for informational purposes only)  
Total Permit Allowable Emissions**

<b>Pollutant</b>	<b>Tons Per Year</b>
PE	3.91 (3.84 increase)
PM10	1.30





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: P0103626  
Permit Type: Chapter 31 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

**Table of Contents**

Authorization ..... 1

A. Standard Terms and Conditions ..... 3

    1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4

    2. Who is responsible for complying with this permit? ..... 4

    3. What records must I keep under this permit? ..... 4

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

    5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 4

    6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 5

    7. What reports must I submit under this permit? ..... 5

    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? ..... 5

    9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5

    10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 6

    11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 6

    12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 6

    13. Can I transfer this permit to a new owner or operator? ..... 6

    14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 7

    15. What happens if a portion of this permit is determined to be invalid? ..... 7

B. Facility-Wide Terms and Conditions ..... 8

C. Emissions Unit Terms and Conditions ..... 10

    1. F002, Ferrous and nonferrous storage piles..... 11





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103626

**Facility ID:** 0448011189

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

## Authorization

Facility ID: 0448011189

Application Number(s): A0005480

Permit Number: P0103626

Permit Description: loading of material onto storage piles, equipment traffic in storage area, wind erosion of pile surfaces and ground areas around piles, and load-out of material for shipment

Permit Type: Chapter 31 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:** P0103626

**Facility ID:** 0448011189

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

## Authorization (continued)

Permit Number: P0103626

Permit Description: loading of material onto storage piles, equipment traffic in storage area, wind erosion of pile surfaces and ground areas around piles, and load-out of material for shipment

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

<b>Emissions Unit ID:</b>	<b>F002</b>
Company Equipment ID:	Torching
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:** P0103626

**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

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103626

**Facility ID:** 0448011189

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

**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.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103626

**Facility ID:** 0448011189

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

## **B. Facility-Wide Terms and Conditions**



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103626

**Facility ID:** 0448011189

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

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.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103626

**Facility ID:** 0448011189

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

## **C. Emissions Unit Terms and Conditions**



**1. F002, Ferrous and nonferrous storage piles**

**Operations, Property and/or Equipment Description:**

Storage pile operations

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
<b>storage pile operations: load-in and loadout of storage piles, equipment traffic in storage areas and wind erosion from storage piles</b>		
a.	OAC rule 3745-31-05(A)(3), (3)(b)	particulate emissions (PE) shall not exceed 3.91 tons per year.  no visible particulate emissions except for a period of time not to exceed 1 minute during any 60-minute period  best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust  see (2)a. through (2)g.
b.	OAC rule 3745-31-05(D)	emissions of particulate matter less than or equal to 10 microns in diameter (PM10) shall not exceed 1.30 tons per year.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(B)(6)	the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)
d.	OAC rule 3745-17-08(B), (B)(6)	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)g.

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control measures on all storage pile operations for the purpose of ensuring compliance with the above-mentioned applicable PE requirements. In accordance with the permittee’s application, the permittee has committed to maintain minimal drop heights to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance including, but not limited to, the periodic application of water or other suitable dust suppression chemicals, the installation of storage silos, bins or other enclosed structures, or the use of canvas or other suitable coverings.
- b. Permit to Install and Operate 04-01497 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements for PM10 under OAC rule 3745-31-05(A)(3)(b):
  - i. restrict the throughput of materials in this emissions unit to 720,000 tons per year 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;
  - ii. maintain minimal drop heights. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance including, but not limited to, the periodic application of water or other suitable dust suppression chemicals, the installation of storage silos, bins or other enclosed structures, or the use of canvas or other suitable coverings.
- c. The operator shall avoid dragging any front-end loader bucket along the ground. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.



- d. The above-mentioned control measure(s) shall be employed for any storage pile operation at 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(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- e. Implementation of the control measure(s) shall not be necessary for wind erosion of a storage pile 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.
- f. Implementation of the control measures of a. thru e. above, will be considered adequate to ensure an effective control for fugitive emissions of 75% for wind erosion and loadout, and 95% for loadin and equipment traffic.
- g. 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(B).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping 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:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
all	daily

- (2) Except as otherwise provided in this section, the permittee shall perform inspections of all equipment traffic at each storage pile area in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum equipment traffic inspection frequency</u>
all	daily

- (3) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
all	daily

- (4) 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

all

daily

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

The information required in d. shall be kept separately for (i) the load-in operations, (ii) equipment traffic, (iii) the pile surfaces (wind erosion) and (iv) the load-out operations, 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 b)(1) shall be determined in accordance with the following methods:



a. Emissions Limitations:

3.91 tons/year of fugitive PE

1.30 tons/year of fugitive PM10

Applicable Compliance Method:

Compliance with fugitive PE and PM10 limitations shall be determined by using the emission factor equations in Section 11.19 in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 8/04), for load-in operations, Section 13.2.2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for equipment traffic in the storage pile areas, Section 2.1.2 from the Ohio EPA's 9/80 Reasonably available control measures (RACM) document for losses from storage pile wind erosion, and Section 13.2.4, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06), for load-out operations. 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 effective control for fugitive emissions of 75% for wind erosion and loadout, and 95% for loadin and equipment traffic.

b. Emission Limitation:

There shall be no visible particulate emissions except for a period of time not to exceed one minute in any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible PE limitations for the storage piles 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), with the following modifications:

- i. if the observer's view is obscured and observations must be terminated prior to completing the necessary or desired observation period, the observer shall note this fact on the observation form; and the observation period shall be completed when the view of the storage pile is no longer obscured;
- ii. the observer shall identify all interruptions due to rest breaks on the observation form; and
- iii. observations, excluding break periods and periods of obscure vision, shall be considered continuous for the purpose of determining compliance with the visible emission limitation.

g) Miscellaneous Requirements

- (1) None.