



State of Ohio Environmental Protection Agency

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9/19/2008

Certified Mail

JAMES SHOLLENBERGER
OMNISOURCE CORP
2453 HILL AVE
TOLEDO, OH 43607

No	TOXIC REVIEW
No	PSD
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No	CEMS
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No	NSPS
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No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0448011189
Permit Number: P0103630
Permit Type: Initial Installation
County: Lucas

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Toledo Department of Environmental Services. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,


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

Cc: TDES

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



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Response to Comments

General Comments

Comment 1.

In the enclosed Redline Permit OmniSource has limited its changes largely to actual Permit terms and conditions. To the extent that any of the Permit Write-Ups need to be changed as a result of any of these comments, OmniSource requests that the corresponding changes be made to those documents as well.

Response to Comment 1.

Agreed.

F001: Roadways and Parking Areas - Permit #04-01497

Comment 2.

Visible PE Limits: OmniSource feels that the visible particulate emissions (“PE”) limits currently in place for both paved and unpaved roadways and parking areas are not reflective of the Best Available Technology (“BAT”). Although those limits are established in the General Permits for paved and unpaved roadways, the requirements to have absolutely no visible emissions except for paved and unpaved roadways, the requirement to have absolutely no visible emissions except for one or three minutes during any 60 minutes is not realistic for any industry, even using the types of emissions control techniques that are set out in the General Permits (chemical stabilization/dust suppression methods and/or watering). While OmniSource is committed to treating paved and unpaved roadways and parking areas using good housekeeping and other dust suppression methods, attaining the standard of absolutely no visible emissions except for only three (3) minutes during any sixty (60) minute period (or one (1) minute for any sixty (60) minute period on paved roadways) is not reflective of what the BAT methods currently prescribed by the General Permit - “best available control measures that are sufficient to **minimize or** eliminate visible PE of fugitive dust” - can actually achieve in practice. OmniSource would agree to meeting a 20% opacity limit on unpaved roadways and 10% on paved roadways, but does not think that having no visible emissions whatsoever for 59/60 or 57/60 of an hour is achievable applying BAT. Although not necessarily reflected in the attached Redline Permit, OmniSource also request that the associated rule citations, monitoring, recordkeeping, reporting and testing requirements be changed accordingly.

Response to Comment 2.

The requirement to have no visible emissions except for one or three minutes during any 60 minute period was established as BAT in the State of Ohio by a memorandum issued December 8, 1992. All similar permits issued by the State after this date contained these same restrictions.

No change will be made to the permit in response to this comment.

Comment 3.

1.b)(2)g. – Open-bodied Vehicles: This redline changes merely clarifies that OmniSource is able to cover its own vehicles as necessary, but cannot ensure that other vehicles transporting scrap to or from the facility are covered.



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Response to Comment 3.

This term is consistent with the state implementation plan limitations of OAC rule 3745-17-08(B)(7) which requires: "The covering, at all times, of open bodied vehicles when transporting materials likely to become airborne." and follows previously issued OEPA guidance. We believe the intent of this term is to make OmniSource responsible for all vehicles entering or leaving the facility. No change will be made to the permit in response to this comment.

Comment 4.

Voluntary Throughput Restriction: The throughput restriction is at the shredder (F005), and was for the purpose of limiting VOC emissions. It does not have a direct relationship to the calculation of emissions from roadways. OmniSource requests that references to this shredder throughput limit be removed from any permit conditions pertaining to roadways.

Response to Comment 4.

The calculations utilized to generate the permit limitations were based on assumptions incorporating the throughput restriction at the shredder (F005). As described in the calculations shown in the Permit Strategy Write-Up, the shredder throughput was utilized in combination with assumed vehicle loading capabilities and travel distances to establish the maximum vehicle miles traveled per year. For this reason the throughput restrictions of F005 are considered both appropriate and necessary for enforceability of the established permit limitations. The removal of the throughput restriction would require a new emissions limitation to be established based on some other physical or inherent limitation, yet to be established. While we do not object to making this change, we see no advantage to OmniSource in making such a change since the restriction of F005 is both required and enforceable separately from F001.

At this time, no change will be made to the permit in response to this comment. Should OmniSource prefer a higher allowable emissions rate with separately enforceable permit limitations, this office will entertain such a request and will modify the permit accordingly. The request for an appropriate general permit would be acceptable.

Comment 5.

1.d) – Daily Inspection Requirement: The daily inspection requirement should be revised to clarify that an inspection is only required on days when the facility is actually operating. Also, OmniSource would like to clarify to whom the monitoring change request should be submitted; if there is a more-specific address or title to whom the request must be submitted, please include that language in provision (3).

Response to Comment 5.

We have added the requested language to clarify that an inspection is only required on days when the facility is actually operating. Records of the operational status of the facility allowing this exemption from the monitoring requirements will be maintained as required under special term and condition (d)(4)(a).

Any request for a monitoring change should be submitted to the City of Toledo, Division of Environmental Services, 348 S. Erie Street, Toledo, Ohio 43604



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To maintain uniformity with the response to Comment 10, Ohio EPA has agreed to revise the permit to include a tiered approach to monitoring which will allow the monitoring to become weekly based on the application of a successful fugitive dust control program.

Comment 6.

1.f)(1)a. and b. – Testing Frequency for Method 22 Testing: The testing frequency and standard for the Method 22 tests has been clarified to match that of the General Permit. However, given that OmniSource has requested that the VE limits be changed to opacity limits, this entire testing requirements section should be modified accordingly.

Response to Comment 6.

No change will be made to the permit in response to this comment. Please refer to the Response to Comment 2 for clarification.

F002: Ferrous and Non-ferrous Storage Piles – Permit # P0103626

Comment 7.

General Permit Applicability: There is a General Permit for storage piles with a maximum production of 3,000,000 tons/year and maximum storage pile surface area of 6 acres. This General Permit therefore appears to apply to the storage piles at the OmniSource facility. It sets requirements for load-in, load-out, and wind erosion at storage piles. It does not include any requirements or limitations on “equipment traffic.” Further, the application forms regarding storage piles do not request information regarding “equipment traffic” with respect to storage piles.

Despite this, the calculation of potential storage pile emissions in the Permit attributes 37.26 tons of PE per year to “equipment traffic” in storage areas. However, multiple calculations found in the Permit Strategy Write-Up for emissions from equipment traffic in storage areas state that the values used are “guesses,” such as the road surface silt content, number of loads, weight per load, and length of trip. Because the calculations state that these values are “guesses,” it appears that Ohio EPA has no basis for its calculated emissions of nearly 40 tons of particulate per year attributed to storage pile traffic only. Also, there is no clear way to distinguish emissions from “equipment traffic” from emissions coming from load-in or load-out, and arguably these cannot be quantified separately. The resulting BAT control requirements and limitations therefore appear to have little relation to the emissions that could actually be generated by traffic in these areas. Finally, none of the BAT requirements set out in the permit relate to “equipment traffic,” and OmniSource does not believe that the one-minute PE limitation is achievable applying BAT that does not prescribe any activities for “equipment traffic.”

OmniSource requests that, consistent with the General Permit for storage piles, the Permit be revised to remove all references, calculations, limitations, and requirements relating to “equipment traffic” in storage pile areas.

Response to Comment 7.

Ohio EPA would entertain OmniSource's request for a General Permit.

While the definition of equipment traffic in the storage pile area is vague, our calculations assumed that it would be that portion of the emissions generated by the internal company operated equipment used to load the over-the-road trucks (i.e., frontend loaders, etc.). We have included the emissions from the operations of the trucks in the roadway and parking lots permit.



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Our estimates were based on good engineering judgment evolved from experience with other loading operations. We are open to receipt of OmniSource's more accurate representations of the road surface silt content, number of loads, weight per load, and length of trip, etc.

The requirement to have no visible emissions except for one minute during any 60 minute period was established as BAT in the State of Ohio by a memorandum issued December 8, 1992. All storage pile permits issued by the State after this date contained these same restrictions.

OAC rule 3745-17-01 does not establish a definition of the term "material storage pile" as used in OAC rule 3745-17-07(B)(6). Ohio EPA maintains that the omission of the term "equipment traffic" in the General Permit for storage piles does not establish the precedence that storage piles do not include equipment traffic. Rather they maintain that the determination of whether equipment traffic is considered a part of the roadways permit or a part of the storage pile permit, and subsequently subject to a BAT determination of either 3 or 1 minute(s) of visible emissions during any 60-minute period, respectively, is a determination that can only be made by the OEPA district office or local air agency on a case-by-case basis.

In this case, our determination that the equipment traffic would be included in the storage pile permit was based on the guidance of the Ohio EPA's document "Reasonable Available Control Measures for Fugitive Dust Sources" dated September 1980, Section 2.1.2.1 Aggregate Storage Pile, Source Description which states: "Dust emissions can occur at several points in the storage cycle of an aggregate: 1) during load-in (addition of material onto the pile, 2) during wind disturbance of the pile, 3) during the movement of vehicles in the storage area, and 4) during load-out (removal) of material from the pile. This determination is re-enforced by the storage pile descriptions of AP-42 Section 13.2.4.3 Predictive Emission Factor Equations (Aggregate Handling and Storage Piles) and OEPA Engineering Guide 25, Section 2.1.2. Aggregate Storage Piles.

No change will be made to the permit in response to this comment.

Comment 8.

1.b(1)a. – Emission Limitations: Using the same justifications set forth for the roadways limits above, OmniSource does not agree with restricting visible emissions from storage piles except for one minute during a 60-minute period. Further, PTI 04-0957, issued on or around May 3, 1995 contained the same limit, but the potential particulate emissions were calculated at that time as 0.07 tpy. The agency has calculated particulate emissions of 3.91 tpy from the storage piles, a 3.84 tpy increase. Further, the unpaved roadways at the facility are subject to a 3 minute per hour visible emissions limit. Thus, the one minute/hour restriction appears to be a relic from an old permit with only a small fraction of the current calculated emissions from storage piles, and it is also inconsistent with (and more restrictive than) the visible emissions limit on unpaved roadways at the facility. Because there is no justification for using such a restrictive limit when emissions have increased since the previous permit and when the limit is at odds with the limit on unpaved roadways at the same facility, this limitation should be revised to an opacity limit as requested for facility roadways, above.

Response to Comment 8.

The requirement to have no visible emissions from storage piles except for one minute during any 60 minute period was established as BAT in the State of Ohio by a memorandum issued December 8, 1992. All similar permits issued by the State after this date contained these restrictions.

Emissions calculations performed in 1995 utilized calculations for wind erosion only to establish the permit allowable emissions. These calculations were based on 4 storage piles occupying a combined area of 0.25 acre, 0.11 acre of which was proposed to be indoors with windbreaks installed around the rest. Load-in and



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load-out of the storage piles was lumped into the permit for magnetic separation, which was granted a two year exemption from permitting under OAC rule 3745-31-03(A)(1)(e) to allow OmniSource time to generate an appropriate emissions factor. Emissions from equipment traffic were not included in the calculation. 35 assorted storage piles have been indicated in the permittee's current application, occupying a storage area of approximately 1.5 acres with no enclosures proposed. The Permit Strategy Write-Up identifies the allowable emissions associated with wind erosion to be 1.80 tons per year with control by the application of water as necessary. While the numbers do differ, we are not aware that either calculation was inappropriate. We will entertain documentation supporting OmniSource's application statement: "the proposed storage piles should not cause fugitive emissions."

No change will be made to the permit in response to this comment.

Comment 9.

1.b)(2)c. – Loader Bucket: The requirement to “avoid dragging any front-end loader bucket along the ground” is ambiguous and appears to limit normal loader activities related to moving materials for processing. It would be more appropriate to state that loaders may utilize the bucket as a means of moving material along the surface, but the bucket must minimize surface excavation.

Response to Comment 9.

The referenced language follows OEPA standard permit writing practices, however we have no objection to this modification. The permit will be revised consistent with this request.

Comment 10.

1.d)(1) through (4) – Monitoring Requirements: Approximately 30-35 storage piles will be located at the facility. The current monitoring conditions require daily inspection of every single load-in operation, all equipment traffic, wind erosion, and every single load-out operation at each storage pile. Thus, as currently written, the language requires that OmniSource must inspect every single load-in or load-out of scrap at each of the 35 storage piles. Even a daily inspection for these four parameters once a day for each of 30+ storage piles is overly burdensome, would generate large amounts of paper, and bears no relation to the amount of fugitive particulate expected to be emitted from piles of scrap (as opposed to piles of aggregate). These piles are simply not the same as piles of aggregate, and the emissions are not expected to be the same, either. Therefore, OmniSource requests that the monitoring frequency be reduced to a weekly inspection and that the language in these provisions be revised to clarify that not every single operation at every single pile needs to be inspected, but rather that the operations as a whole (excluding equipment traffic, as explained above) be inspected.

Response to Comment 10.

Ohio EPA has agreed to include a tiered approach to monitoring which will allow the monitoring to become weekly based on the application of a successful fugitive dust control program.

The intent of this term was to allow a single daily visible inspection of the facility operations as a whole with a minimum amount of paperwork for those sources with no visible emissions. OEPA intended this requirement to be neither burdensome or irrelevant, but rather to be a direct indicator of the need to implement additional control measures for any operation which is observed to emit fugitive dust. This term has is utilized in all similar permits with fugitive emissions and is considered to be appropriate and necessary to this emissions unit. No change will be made to the permit in response to this comment.



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Comment 11.

1.f)(1)b. –Testing Frequency for Method 22 Testing: The testing frequency has been clarified. However, given that OmniSource has requested that the VE limits be changed to opacity limits, this entire testing requirements section should be modified accordingly.

Response to Comment 11.

No change will be made to the permit in response to this comment. Please refer to the Response to Comment 8 for clarification.

F003: Material Handling – Permit # P0103630

Comment 12.

Permit Description: OmniSource requests that the equipment description be revised consistent with the Redline Permit.

Response to Comment 12.

The permit will be revised consistent with this request.

Comment 13.

Closed-Loop Cyclone: The separation system does utilize a cyclone from the Z-box, but it does not have a stack. Rather, the cyclone is a closed loop, as indicated in the process flow diagram submitted with the permit application. There are no openings other than the air knives in the Z-box, the suction points after the Z-box and the airlock below the cyclone. There is no stack, and no emissions associated with the Z-box. The enclosed photos were taken at another OmniSource facility with the same type of shredder/Z-box/closed-loop cyclone arrangement. However, the Z-box at the Toledo facility will be indoors rather than outdoors, as shown in the process flow diagram submitted with the permit application.

The z-box/cyclone in the ferrous/nonferrous metal separator sorts the shredded metal into ferrous, nonferrous and mixed (tramp) metals by use of an air powered centripetal process. Upon entering the metal separator, the stream of shredded metal is first sorted with magnets into ferrous and non-ferrous materials streams. The “ferrous” materials” stream (which, at this point in the process still contains about 4% non-ferrous materials by weight) then enters the z-box/closed-loop cyclone where, by use of air currents, it is spun, sorted, separated and collected into ferrous and non-ferrous material streams.

The z-box/closed-loop cyclone is considered integral to process because:

1. The z-box/closed-loop cyclone serves a primary purpose other than pollution control. The z-box/closed-loop cyclone is part of the materials sorting and collection mechanism. Its use enables high quality sorting of the input material into ferrous and non-ferrous materials in a one-pass-through operation. (Without use of the closed-loop cyclone, a poor quality sorting of materials occurs, requiring reprocessing.)
2. The process cannot operate without the z-box/closed-loop cyclone. This type of cyclone creates the air current needed in the z-box/cyclone structure to sort the shredded metal that passes through it into



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ferrous and nonferrous materials. Without the air current that is created, the shredded metal is not sorted.

Because there is no stack on this closed-loop system, the calculations for potential stack emissions from the Z-box are in error, and should be reduced to 0 tons per year. Therefore, the visible emission limits and particulate limits that have been assigned to the “cyclone stack” need to be removed from the Permit, because the unit simply does not have a stack and therefore these requirements are impossible to meet. All calculations, monitoring, recordkeeping, and testing requirements related to this stack should also be removed from the Permit and the Permit Strategy Write-Up.

Response to Comment 13.

Additional information on the nature of this operation was submitted justifying the modification of these restrictions. The permit and the Permit Strategy Write-Up were also modified accordingly.

Comment 14.

“Visible Emission Incident”: The daily monitoring requirement for the equipment included in F003 is burdensome and does not bear a relation to the limits actually set in the Permit. The standard used to determine whether a “visible emission incident” has occurred – merely whether “visible emissions are present” – does not necessarily mean that the facility is in violation of the fugitive standards applicable to it. Therefore, daily checks for “visible emission incidents” and the related recordkeeping are overly burdensome and should be removed from the permit, or changed to clarify that “abnormal” emissions constitute a “visible emission incident”.

Response to Comment 14.

The intent of the BAT determination was to establish a level of control which would eliminate visible emissions from the material handling system. Adequate control to comply with the required 10% opacity as a three-minute average is anticipated to result in no visible emissions during normal process operations. The monitoring requirements are intended to identify which emissions points require additional control, and should numerous instances of a “visible emission incident” occur for a given operation, the related reporting would be an indication to our office for a need to examine the operation more closely. This examination could include the additional requirement for formal visible emissions testing. This monitoring and recordkeeping is considered essential to ensure on-going compliance with the emissions limitations.

No change will be made to the permit in response to this comment

Comment 15.

1.f) – Testing Requirements: Because there is no stack serving the cyclone, opacity testing and stack testing of this stack cannot be performed.

Provision 1.f)(2)c.ii. requires that procedures outlined in OAC 3745-17-03(B)(3) be used to demonstrate compliance with the visible emissions limitations on “i.e., conveyors, separators, building windows, doors, roof monitors, etc.” However, provision 1.f)(1) also prescribes “Applicable Compliance Methods” for these points, which appear to be at odds with provision 1.f)(2)c.ii because they do not prescribe the same testing method. OmniSource requests that the conflicting language be revised accordingly.



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Response to Comment 15.

The permit will be revised consistent with this request.

F004: Torching Stations – Permit # P0103630

Comment 16.

2. – Purpose of Torching Operations: The torching operation is not for preparing material to be shredded, but rather is for the resizing of materials that cannot be shredded. These materials are not subsequently fed into the shredder. OmniSource requests that the description of the Torching Stations be revised accordingly.

Response to Comment 16.

The permit will be revised consistent with this request.

Comment 17.

2.b)(2)a.i. – Choice of Fire Suppression Methods: OmniSource requests that the requirement to “have fire extinguishers of the appropriate type” be expanded to also allow for other suppression methods as provided in the Redline Permit.

Response to Comment 17.

The comment requests that the permit language "fire extinguishers of the appropriate type" be replaced by "fire extinguishers or other suppression methods". The permit will be revised consistent with this request.

Comment 18.

2.b)(2)a.ii. – Cutting Practices: The requirement that OmniSource cut metal that is “clean” of “any” oils or other combustible fluids is a vague standard. OmniSource requests that the requirement be revised as provided in the Redline Permit.

Response to Comment 18.

OmniSource submitted an emissions factor as appropriate for this process which was developed for the welding of clean steel plate. The comment requests that the permit language "cutting metal that is clean of any oil(s) or other combustible fluids" be replaced by "cutting metal that is clean, to the extent practicable, of any oil(s) or other combustible fluids". The permit will be revised consistent with this request, with the understanding that should the company elect to cut metal which contains oil(s) or other combustible fluids, additional testing may be required to develop a specific emissions factor(s) for that operation.

Comment 19.

“VE incident”: See related comment for F003, above. Additionally, daily inspections for visible emissions of all of these various pieces of equipment located at the facility, including F004, result in hours spent each day dealing with inspections and the multitude of recordkeeping requirements. The monitoring requirements for F004 and the other emission units at the facility should be adjusted to a weekly schedule, which would balance sufficient monitoring and hours spent generating records.



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Response to Comment 19.

Ohio EPA has agreed to include a tiered approach to monitoring which will allow the monitoring to become weekly based on the application of a successful fugitive dust control program.

The requirement of OAC rule 3745-17-07(B)(1), 20% opacity as a three-minute average, is intended to establish a level of control which would minimize or eliminate visible emissions from the torching operations, consistent with compliance with OAC rule 3745-17-08(B)(3). Adequate control to comply with these requirements is anticipated to result in little or no visible emissions during normal process operations. The monitoring requirements are intended to identify which emissions points require additional control, and should numerous instances of a "visible emission incident" occur for a given operation, the related reporting would be an indication to our office for a need to examine the operation more closely. This examination could include the additional requirement for formal emissions testing and could potentially serve to demonstrate that OmniSource's proposed enclosure and control techniques are inadequate to meet this minimum State requirement. This monitoring and recordkeeping is considered essential to ensure on-going compliance with the emissions limitation. Please see the related response to comment 10. No change will be made to the permit in response to this comment

Comment 20.

3. – Testing Requirements: The testing frequency has been clarified in the Redline Permit.

Response to Comment 20.

The comment requests that the permit language "Compliance shall be determined" be replaced by "When required, compliance shall be determined". This language is commonly expressed in other Ohio permits as "If required, compliance shall be determined". To ensure uniformity, all permits comprising this project will be revised consistent with the "If required," language, where appropriate.

F005: Scrap Metal Shredder – Permit # P0103630

Comment 21.

3.b)(2) – Additional Terms and Conditions: OmniSource requests that this language be revised to clarify OmniSource's commitment to taking these actions to reduce possible VOC emissions from the shredder while still recognizing that it is not always possible to obtain "all" of these materials from scrap metal, even with extensive operational practices in place.

Response to Comment 21.

The comment requests that the permit language "the removal (draining) of combustible and VOC containing fluids from uncrushed autos," be replaced by "the removal (draining), to the extent practicable, of combustible and VOC containing fluids from uncrushed autos". Similar language is requested to be changed. The permit will be revised consistent with this request.

The comment also requests that the permit terms not be applied as worded to "scrap metal, etc.," or "components", and that the inclusive terms "all" and "any" be struck from the permit term. The permit term contains the previously agreed upon "to the extent practicable" language. We find no merit in an additional relaxation of these requirements. No revision will be made in response to this request.



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Comment 22.

3.d)(1) – Monitoring Requirements: It is overly burdensome to require OmniSource to maintain records of a failure to remove items prior to shredding, because it may not be possible for the facility to even know that it has inadvertently failed to remove these items.

Response to Comment 22.

The intent of this term was to make the associated removal requirement of 3.b)(2)b. enforceable as a practical matter. OEPA intended this requirement to be neither burdensome or irrelevant, but rather to be a direct indicator of the need to modify or adjust any operational practice(s) which resulted in a failure to remove, prior to shredding, the listed materials. This term does not contain a requirement to report what is not known. This term has been utilized in similar permits and is considered to be appropriate and necessary to this emissions unit. No change will be made to the permit in response to this comment.

Comment 23.

“VE incident”: See related comments for F003 and F004, above.

Response to Comment 23.

Please see the related responses to comments for F003 and F004, above. No change will be made to the permit in response to this comment.

Comment 24.

3.f)(1) – Testing Requirements: The shredder does not have a stack or other opening that allows for the capture of emissions prior to being vented. Fugitive emissions by definition are emissions that cannot be captured. It is not possible to test in order to determine compliance with the limitations on fugitive emissions found at provisions b. through d.

Response to Comment 24.

We acknowledge that this emissions unit will not be constructed with a stack. The inclusion of Methods 1 thru 5, 25, 201 and 202 was intended to define the stack test that would be required to demonstrate compliance with the emissions limitations for PE, VOC and PM10, respectively, should such a test be deemed necessary. The inclusion of Method 204 was intended to formalize the description of a temporary total enclosure which would be constructed to allow for the stack to be tested. Method 204 is specific to VOC, so for particulate testing the reference would be an "alternate" way of using M204, however for enforcement purposes, we considered the references to be correct. Additional clarifying language will be added to these terms to address OmniSource's comment.

Comment 25.

3.f)(2)c. – Testing Requirements: The test methods to be used for opacity testing are already specified in provision 3.f)(1) and should therefore be removed from this provision.

Response to Comment 25.

The citations are correct and follow OEPA standard permit writing practices, however we have no objection to this modification. The permit will be revised consistent with this request.



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K001: Spray Booth – Permit # P0103630

Comment 26.

4.c)(3) – Toxic Screening Criteria: OmniSource requests that this provision clarify that the toxic screening evaluation is to be conducted whenever a new coating is to be employed in the paint booth, and not on any more-frequent basis.

Response to Comment 26.

The permit will be revised consistent with this request.

Comment 27.

4.d) – Recordkeeping Requirements: Unit K001 is a maintenance paint booth only and is not used for production purposes. As a result, it is not used everyday. This requirement should be revised to clarify that the records need to be created only for the days that the paint booth is in use. Also, the requirement in d)(3) to record a cumulative production rate does not make sense when applied to a maintenance paint booth, particularly when the limits applicable to this paint booth are not based on a production rate. Therefore, OmniSource requests that this requirement be deleted.

Response to Comment 27.

The comment requests that the permit language "The permittee shall maintain daily records" be replaced by "For days when the paint booth is in use, the permittee shall maintain daily records". This language is commonly expressed in other Ohio permits as "On any day during which the emissions unit is in use, the permittee shall maintain daily records". The permit will be revised consistent with this response.

The recordkeeping requirements of d)(3) have been established to demonstrate compliance with 4.c)(2). No revision will be made in response to this comment.

Comment 28.

4.e)(1) – Reporting Requirements: The notification that the coating line used over 10 gpd could be included in a quarterly deviation report rather than submitted separately.

Response to Comment 28.

Reporting requirements have been established subject to the requirements of OAC rule 3745-21-09(B)(3)(e) which requires the 45 day reporting. No revision will be made.

Comment 29.

4.f)(1)b. – Testing Requirements: These are off-the-shelf coatings; formulation data provided by the manufacturer should suffice to ensure that the VOC content per gallon is accurate. It is overly burdensome to require any additional testing.



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Response to Comment 29.

These "if required" testing requirements have been established subject to OAC rule 3745-21-10(B) and are considered appropriate to this permit. No revision will be made.



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FINAL

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

Facility ID: 0448011189
Permit Number: P0103630
Permit Type: Initial Installation
Issued: 9/19/2008
Effective: 9/19/2008
Expiration: 9/19/2013



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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Authorization

Facility ID: 0448011189
Application Number(s): A0005480, A0035533
Permit Number: P0103630
Permit Description: F003 - magnetic separation and conveying of nonferrous material to open storage piles, conveying of ferrous material to open storage piles and ferrous material handling F004 - 19 torching stations, used to resize miscellaneous oversize metal scrap F005 - metal shredder, comprised of an enclosed hammermill driven by an electric motor and the associated material separation equipment (z-box with cyclone) K001 - misc metal parts spray booth <10 gpd
Permit Type: Initial Installation
Permit Fee: \$0.00
Issue Date: 9/19/2008
Effective Date: 9/19/2008
Expiration Date: 9/19/2013
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

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



Authorization (continued)

Permit Number: P0103630
Permit Description: F003 - magnetic separation and conveying of nonferrous material to open storage piles, conveying of ferrous material to open storage piles and ferrous material handling F004 - 19 torching stations, used to resize miscellaneous oversize metal scrap F005 - metal shredder, comprised of an enclosed hammermill driven by an electric motor and the associated material separation equipment (z-box with cyclone) K001 - misc metal parts spray booth <10 gpd

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

- | | |
|-----------------------------------|----------------------|
| Emissions Unit ID: | F003 |
| Company Equipment ID: | material handling |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | F004 |
| Company Equipment ID: | torching stations |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | F005 |
| Company Equipment ID: | scrap metal shredder |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K001 |
| Company Equipment ID: | spray booth |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |



State of Ohio Environmental Protection Agency
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Final Permit-to-Install and Operate

Permit Number: P0103630

Facility ID: 0448011189

Effective Date: 9/19/2008

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.

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



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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
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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0103630

Facility ID: 0448011189

Effective Date: 9/19/2008

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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Effective Date: 9/19/2008

C. Emissions Unit Terms and Conditions



1. F003, material handling

Operations, Property and/or Equipment Description:

material handling - magnetic separation and conveying of nonferrous material to open storage piles, conveying of ferrous material to open storage piles and ferrous material handling.

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
a.	OAC rule 3745-31-05(A)(3)	visible fugitive particulate emissions from this emissions unit shall not exceed 10% opacity as a 3-minute average fugitive particulate emissions (PE) from this emissions unit shall not exceed 12.76 pounds per hour fugitive particulate matter emissions less than or equal to 10 microns in diameter (PM10) from this emissions unit shall not exceed 4.69 pounds per hour see (2)a.
b.	OAC rule 3745-31-05(D)	fugitive PE, from this emissions unit shall not exceed 20.50 tons per year fugitive PM10, from this emissions unit shall not exceed 7.54 tons per year see (2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(B)(1)	the emission limitation required by this applicable 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)(3)	the permittee shall utilize reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see (2)c.

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control measures on all material handling 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 the maintenance of a moisture content of all processed material sufficient to meet the required visible emission limits above at all times and to maintain minimal drop heights to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- b. Permit to Install and Operate P0103630 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:
 - i. maintenance of a moisture content of all processed material sufficient to meet the required visible emission limits at all times;
 - ii. maintain minimal drop heights to ensure compliance; and
 - iii. 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.
- c. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably available technology requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack



and for any visible emissions of fugitive dust from the egress points (i.e., conveyors, conveyor transfer points, separators building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

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:

visible fugitive particulate emissions from this emissions unit shall not exceed 10% opacity as a 3-minute average

Applicable Compliance Method:

If required, compliance shall be determined in accordance with U.S. EPA Method 9, with the following modifications:

- i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;
- ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;
- iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions and the line of sight should be approximately perpendicular to the flow of fugitive dust and to the longer axis of the emissions; and
- iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.

b. Emission Limitation:

fugitive PE from this emissions unit shall not exceed 12.76 pounds per hour

Applicable Compliance Method:

This emission limitation was established to reflect the worst case maximum rate of fugitive emissions from this emissions unit based on a normalization of the maximum annual allowable fugitive emission rate (14.02 tons per year from conveying operations and 6.48 tons per year from fugitive process emissions in the building), the maximum process throughput rate of the shredder (224 tons per year) and the maximum annual total process throughput rate (720,000 tons per year), as follows:

$$(14.02 \text{ tons/yr} + 6.48 \text{ tons/yr PE})(2000 \text{ lb/ton})(224 \text{ tons/hr}) \div (720,000 \text{ tons/yr})$$

c. Emission Limitation:

fugitive PM10 from this emissions unit shall not exceed 4.69 pounds per hour

Applicable Compliance Method:

This emission limitation was established to reflect the worst case maximum rate of fugitive emissions from this emissions unit based on a normalization of the maximum annual allowable fugitive emission rate (5.16 tons per year from conveying operations and 2.38 tons per year from fugitive process emissions in the building), the maximum process throughput rate of the shredder (224 tons



per year) and the maximum annual total process throughput rate (720,000 tons per year), as follows:

$$(5.16 \text{ tons/yr} + 2.38 \text{ tons/yr PM}_{10})(2000 \text{ lb/ton})(224 \text{ tons/hr}) \div (720,000 \text{ tons/yr})$$

d. Emissions Limitations:

Fugitive PE, from this emissions unit shall not exceed 20.50 tons per year

Fugitive PM₁₀, from this emissions unit shall not exceed 7.54 tons per year

Applicable Compliance Method:

These limitations were established by calculations adding the individual contributions of the stack and fugitive sources to reflect the full potential to emit for this emissions unit based on a maximum of 720,000 tons per year of material shredded at emissions unit F005.

Fugitive PE and PM₁₀ limitations shall be determined by calculations adding the individual contributions of the fugitive sources as follows:

- i. conveyor belt transfer points were estimated using the emission factors taken from AP-42, Chapter 11.19.2. Table 11.19.2-2 EMISSION FACTORS FOR CRUSHED STONE PROCESSING OPERATIONS dated 8/04: 0.0030 pound PE per ton uncontrolled and 0.00014 pound PE per ton controlled by wet suppression, 0.0011 pound PM₁₀ per ton uncontrolled and 0.000046 pound per ton PM₁₀ controlled by wet suppression and 720,000 tons per year of material shredded at emissions unit F005;
- ii. emissions from the z-box, poker picker, magnet, vibrator, combining chute and manual sorting were typified as the equivalent of 12 transfer conveyor belt points;
- iii. 50% effective control was allowed based on a building enclosure; and
- iv. PM₁₀ was assumed to comprise 35% of the PE by weight.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 180 days of initial start-up.

The emission testing shall be conducted to demonstrate compliance with the visible emissions limitations from all egress points (i.e., conveyors, separators, building windows, doors, roof monitors, etc.) for which monitoring as performed under d)(1) has indicated the presence of visible emissions.

The test method set forth above at 1.f)(1)a. shall be employed to demonstrate compliance with the allowable visible particulate emissions limitation.



- b. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services.
 - c. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Toledo Division of Environmental Services' refusal to accept the results of the emission test(s).
 - d. Personnel from the Toledo Division of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - e. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Toledo Division of Environmental Services.
- g) Miscellaneous Requirements
- (1) None.



2. F004, torching stations

Operations, Property and/or Equipment Description:

19 torching stations, used to resize miscellaneous oversized scrap metal.

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
a.	OAC rule 3745-31-05(D)	fugitive particulate emissions (PE) shall not exceed 4.99 tons per year fugitive particulate matter emissions less than or equal to 10 microns in diameter (PM10) shall not exceed 4.99 tons per year see (2)a.
b.	OAC rule 3745-17-07(B)(1)	visible fugitive particulate emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average
c.	OAC rule 3745-17-08(B), (B)(3)	the permittee shall utilize reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		see (2)b.

(2) Additional Terms and Conditions

a. Permit to Install and Operate P0103630 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. The permittee shall have fire extinguishers or other appropriate suppression methods located near any cutting stations which shall be employed promptly to extinguish any accidental fires caused by cutting operations.
- ii. The permittee shall employ accepted practices when cutting torches are being used to minimize resulting visible emissions. Such practices shall include, but not be limited to, the following items: cutting metal that is, to the extent practicable, clean of any oil(s) or other combustible fluids, the minimization of flame impingement with the ground, and the use of the appropriately sized cutting torch(s).
- iii. Oxygen lances or powder metal cutting will not be used.

Implementation of these control measures will be considered adequate to restrict controlled potential particulate emissions to less than 10.0 tons per year. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably available technology requirements of OAC rule 3745-17-08.

c) Operational Restrictions

(1) The permittee shall have fire extinguishers or other appropriate suppression methods located near any cutting station(s) which shall be employed promptly to extinguish any accidental fires caused by cutting operations.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document, while the emissions unit was in operation, any time periods when:

- a. fire extinguishers or other appropriate suppression methods were not located near any cutting station(s); and/or



- b. fire extinguishers or other suppression methods were not employed promptly to extinguish any accidental fires caused by cutting operations when the emissions unit was in operation.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.
- 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:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with U.S. EPA Method 9, with the following modifications:

- i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;
- ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;
- iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions and the line of sight should be approximately perpendicular to the flow of fugitive dust and to the longer axis of the emissions; and
- iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.

b. Emission Limitation:

fugitive PE shall not exceed 4.99 tons per year

fugitive PM10 shall not exceed 4.99 tons per year

Applicable Compliance Method:

Compliance with the fugitive PE and PM10 limitations shall be determined by multiplying the fugitive emission factor for cutting clean steel from the Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-5 dated 1996 (0.06 lb/hr), by the number of torching stations (19) and by the maximum annual operating hours for this emissions unit (8,760 hours per year) divided by 2000 pounds per ton. Should updates in the established emission factor occur, the most current emission factor shall be used to determine compliance with these limitations.

g) Miscellaneous Requirements

(1) None.



3. F005, scrap metal shredder

Operations, Property and/or Equipment Description:

224 TPH Scrap metal shredder with electric motor

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
a.	OAC rule 3745-31-05(A)(3)	emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 55.33 pounds per hour see (2)a. and b.
b.	OAC rule 3745-31-05(D)	visible fugitive particulate emissions from this emissions unit shall not exceed 0% opacity as a 3-minute average fugitive particulate emissions (PE) shall not exceed 0.86 ton per year fugitive particulate matter emissions less than or equal to 10 microns in diameter (PM10) shall not exceed 0.30 ton per year emissions of VOC from this emissions unit shall not exceed 88.92 tons per rolling, 12-month period



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		see (2)c.
c.	OAC rule 3745-17-07(B)(1)	the emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D)
d.	OAC rule 3745-17-08(B), (B)(3)	the permittee shall utilize reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see (2)d.

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control measures on all shredding operations for the purpose of ensuring compliance with the above-mentioned applicable VOC requirements. In accordance with the permittee's application, the permittee has committed to a program of operational practices designed to limit the amount of VOC entering the airstream with the scrap including the removal (draining), to the extent practicable, of combustible and VOC-containing fluids from uncrushed autos, communication to upstream suppliers of OmniSource's Prohibited Materials Program policies, and a "once through" water usage in the shredder

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

- b. Prior to shredding uncrushed automobiles, appliances, scrap metal, etc., the following items shall be removed (to the extent practicable):
 - i. gasoline tanks;
 - ii. batteries;
 - iii. all combustible fluids;
 - iv. all refrigerants from air conditioning systems; and
 - v. any mercury containing convenience switches or components.
- c. Permit to Install and Operate P0103630 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:
 - 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;



- ii. removal (draining), to the extent practicable, of combustible fluids from materials being processed;
 - iii. water sprays directed at the feed rolls and rotor; and
 - iv. "once through" water usage in the shredder.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably available technology requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) Water shall be injected directly into the shredder at the feed rolls and rotor to control dust emissions. Monitoring, recordkeeping and reporting requirements for the water injection system are not required due to the water injection system being an integral part of the shredding process.
- (2) The moisture content of all processed material shall be maintained sufficiently high enough to meet the required visible emission limits above at all times.
- (3) The maximum annual production rate for this emissions unit shall not exceed 720,000 tons per year, based upon a rolling, 12-month summation of the production rates.

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

Month	Maximum Allowable Cumulative Production, tons
1	160,000
1-2	320,000
1-3	480,000
1-4	640,000
1-5	720,000
1-6	720,000
1-7	720,000
1-8	720,000
1-9	720,000
1-10	720,000
1-11	720,000
1-12	720,000



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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of any failure to remove prior to shredding automobiles, appliances, scrap metal, etc., the following items:
 - a. gasoline tanks;
 - b. batteries;
 - c. all combustible fluids;
 - d. all refrigerants from air conditioning systems; and
 - e. all mercury containing convenience switches or components.
- (2) The permittee shall maintain monthly records of the following information:
 - a. the production rate for each month; and
 - b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the production rates.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., feeder, shredder, discharge chute, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the



emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (4) For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month production rate limitation; and
 - ii. for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative production rate levels;
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the Toledo Division of Environmental Services).

- (2) 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:

visible fugitive particulate emissions from this emissions unit shall not exceed 0% opacity as a 3-minute average

Applicable Compliance Method:

If required, compliance shall be determined in accordance with U.S. EPA Method 9, with the following modifications:

- i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;
- ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;
- iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions and the line of sight should be approximately perpendicular to the flow of fugitive dust and to the longer axis of the emissions; and
- iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.

b. Emission Limitation:

fugitive PE shall not exceed 0.86 ton per year

fugitive PM10 shall not exceed 0.30 ton per year

Applicable Compliance Method:

These limitations were established to reflect the full potential to emit for this emissions unit based on a maximum of 720,000 tons per year of material shredded utilizing a company supplied emissions factor (0.0024 lb PE/ton) determined during stack testing of a similar emissions unit. PM10 was established as 35% of the PE emissions.

If required, the permittee shall demonstrate compliance with the short term emission limitations (lb/ton) by construction of a temporary total enclosure designed to satisfy the requirements of Method 204, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) Stack testing will be performed in accordance with Methods 1 thru 5 of 40 CFR Part 60, Appendix A and Methods 201 and 202 of 40 CFR Part 51, Appendix M.



Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

emissions of VOC from this emissions unit shall not exceed 55.33 pounds per hour

This limitation was established to reflect the full potential to emit for this emissions unit utilizing a company supplied emissions factor (0.247 lb VOC/ton) determined during stack testing of a similar emissions unit.

If required, the permittee shall demonstrate compliance with the short term emission limitations (lb/ton) by construction of a temporary total enclosure designed to satisfy the requirements of Method 204, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) Stack testing will be performed in accordance with Methods 1 thru 4 and 25 or 25 A, as appropriate, of 40 CFR Part 60, Appendix A, and the procedures outlined in OAC rule 3745-21-10(C). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

emissions of VOC from this emissions unit shall not exceed 88.92 tons per rolling, 12-month period

Applicable Compliance Method:

These limitations were established to reflect the full potential to emit for this emissions unit based on a maximum of 720,000 tons per rolling, 12-month period of material shredded utilizing a company supplied emissions factor (0.247 lb VOC/ton) determined during stack testing of a similar emissions unit.

If required, the permittee shall demonstrate compliance with the short term emission limitations (lb/ton) by construction of a temporary total enclosure designed to satisfy the requirements of Method 204, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) Stack testing will be performed in accordance with Methods 1 thru 4 and 25 or 25 A, as appropriate, of 40 CFR Part 60, Appendix A, and the procedures outlined in OAC rule 3745-21-10(C). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 90 days of achieving the maximum capacity at which this emissions unit will be operated, but not less than 180 days after initial startup.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable visible particulate emissions limitation.
 - c. The test method set forth above at 3.f)(1)a. shall be employed to demonstrate compliance with the allowable visible particulate emissions limitation.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Toledo Division of Environmental Services' refusal to accept the results of the emission test(s).
 - f. Personnel from the Toledo Division of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Toledo Division of Environmental Services.
- g) Miscellaneous Requirements
 - (1) None.



4. K001, spray booth

Operations, Property and/or Equipment Description:

Miscellaneous coating 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. c)(3) and d)(4)
 - (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
a.	OAC rule 3745-31-05(D)	<p>particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.01 ton per year</p> <p>particulate matter emissions less than or equal to 10 microns in diameter (PM10) from the stack serving this emissions unit shall not exceed 0.01 ton per year</p> <p>the emissions of volatile organic compound (VOC) from the stack serving this emissions unit shall not exceed 3.66 tons per rolling 12-month period, including both coatings and cleanup materials</p> <p>see (2)a.</p>
b.	OAC rule 3745-17-07(A)(1)	visible emissions from the stack serving this emissions unit shall not exceed 20% opacity, as a six - minute



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		average, except as specified by rule
c.	OAC rule 3745-17-11(B)(1)	PE from the stack serving this emissions unit shall not exceed 0.551 pound per hour
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	Exempt, see (2)b.

(2) Additional Terms and Conditions

- a. Permit to Install and Operate P0103630 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. the permittee shall not use more than 10 gallons of coating material per day;
 - ii. the permittee shall not use more than 1500 gallons of coating material per rolling, 12-month period;
 - iii. the permittee shall utilize a maximum 4.88 pound of VOC per gallon coating material, as applied, for the coating of miscellaneous metal parts;
 - iv. the permittee shall utilize no VOC containing clean up materials or solvents in the coating operations for parts cleaning, thinning or reducing coatings, to clean paint guns, booth walls, etc.;
 - v. all coating operations will utilize an airless spray gun; and
 - vi. all coating operations will utilize a paint spray booth equipped with an exhaust gas filtration system.
- b. The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.
- (2) The maximum annual coating usage rate for this emissions unit shall not exceed 1,500 gallons per year, based upon a rolling, 12-month summation of the coating usage rates.

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



Month	Maximum Allowable Cumulative Coating Usage (gallons)
1	300
1-2	600
1-3	900
1-4	1,200
1-5	1,500
1-6	1,500
1-7	1,500
1-8	1,500
1-9	1,500
1-10	1,500
1-11	1,500
1-12	1,500

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

- (3) Prior to the initial use of any coating in this coating line, the permittee shall determine that the coating meets the toxic screening criteria described below.

Purpose: The purpose of this test is to evaluate coatings to determine if the chemical compounds in the coatings would be emitted at acceptable levels for the general permit.

Data Needed: (1) MSDS sheet for each coating to be evaluated. (2) Information on the maximum coating usage rate for the line as discussed in Step 1 below.

Step 1. Using the following factors, calculate the maximum coating usage rate in terms of gallons per hour:

- a. Assume the coating line operates at its maximum speed while still making usable product.
- b. Assume the coating line is operating at its largest coating laydown rate. This would typically be accomplished by assuming the coating line is painting the largest part available.

Step 2. Review the material safety data sheet (MSDS) for the coating. Note each chemical compound listed its TLV and the percent by weight of the chemical compound in the coating.



Step 3. Determine if any of the chemical compounds listed in the MSDS are also listed in the following table. If any of the chemical compounds are listed in the table, then calculate the maximum annual emission of that compound by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. Then multiply the result by 8760 hours per year. The result will be in pounds per year.

Check to see if the calculated emission rate is less than the allowable emission rate found in the below table. If all of the compounds emitted have a maximum annual emission of less than the allowed rate, then move on to step 4. If any of the compounds are emitted at a rate higher than the allowed emission rate, then contact your appropriate District Office or local air agency contact to determine if you can use the coating.

Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (lb/year)
arsenic compounds, as As	7440-38-2	74.92	1.70
benzene	71-43-2	78.11	1100
benzidine	92-87-5	184.23	5.60
benzo(a)pyrene	50-32-8	252.30	6.90
beryllium (and Be compounds)	7440-41-7	9.01	0.350
Cadmium	7440-43-9	112.4	5.20
Chromium	7440-47-3	varies	0.690
Hexachlorobenzene (HCB)	118-74-1	289.78	35.0
mercury (and Hg compounds)	7439-97-6	200.59	0.1
nickel (Ni subsulfide)	12035-72-2	240.19	17.0
Polychlorinated dibenzo-p-dioxins	1746-01-6	varies	0.030
Polychlorinated dibenzofurans	132-64-9	varies	0.030
polychlorinated biphenyls (PCBs, aroclors)	1336-36-3	varies	87.0
vinyl chloride	75-01-4	62.50	2000

Step 4. Find all of the chemical compounds in the coating that have a listed American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV). For each chemical compound with a listed TLV (other than those in the above table), calculate the maximum short-term emission rate by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. The result should be in terms of pounds of the chemical compound per hour.

Step 5. Determine if the compound will be emitted at or below the acceptable rate. This is done by searching the following table for the chemical compound's TLV and then determining the maximum allowed emission rate listed in the below table. (Note. If the TLV is listed as ppm, then convert the TLV to $\mu\text{g}/\text{m}^3$ by using the following formula: $(\text{TLV in ppm}) \times (\text{MW}) \times (1000) / 24.45 = \text{TLV in } \mu\text{g}/\text{m}^3$; where MW is the molecular weight of the compound.) This table lists the allowable emission rates for compounds with a TLV between the high range and low range. Compare the maximum calculated short-term emission rate of each chemical compound to the allowed emission rate in the table. If



the maximum emission rate is less than the allowed emission rate, then the chemical compound is emitted at an acceptable rate.

TLV Range ($\mu\text{g}/\text{m}^3$) (The TLV must be less than the high value listed and greater than or equal to the low value listed)		Allowed Emission Rate (lb/hr)
15	1	0.000067
30	15	0.0010
60	30	0.0020
120	60	0.0040
240	120	0.0080
480	240	0.0160
960	480	0.0320
1,920	960	0.0640
3,840	1,920	0.128
7,680	3,840	0.256
15,360	7,680	0.512
30,720	15,360	1.02
61,440	30,720	2.05
122,880	61,440	4.10
245,760	122,880	8.19
491,520	245,760	16.4
983,040	491,520	32.8
1,966,080	983,040	65.5
3,932,160	1,966,080	131

Step 6. Check each chemical compound that has a listed TLV. If all compounds are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the chemical compounds are emitted at a rate greater than the allowed emission rate, then you should contact your appropriate District Office or local air agency contact to determine if you can use the coating.

d) Monitoring and/or Recordkeeping Requirements

- (1) On any day during which the emissions unit is in use, the permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- (2) On any day during which the emissions unit is in use, the permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating employed in the coating line;
 - b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied;



- c. the volume, in gallons, of each coating employed in the coating line; and
- d. the total volume, in gallons, of all of the coatings employed in the coating line.

These records shall be maintained for a period of not less than three years.

- (3) The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification of each VOC containing cleanup material employed;
 - b. the VOC content of each cleanup material employed, in pounds per gallon;
 - c. the number of gallons of each VOC containing cleanup material employed;
 - d. the total volume, in gallons, of all of the coatings employed in the coating line; and
 - e. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the coating usage rates. Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative production rate for each calendar month.
- (4) The permittee shall collect and record the results of any toxic screening evaluations done per c)(3).

e) Reporting Requirements

- (1) The permittee shall notify the Director (the City of Toledo, Division of Environmental Services) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 10 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (the City of Toledo, Division of Environmental Services) within 45 days after the exceedance occurs.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the 4.88 pounds of VOC per gallon of coating limitation;
 - ii. all exceedances of the no VOC containing clean up materials or solvents limitation;
 - iii. all exceedances of the rolling, 12-month coating usage rate limitation; and



iv. for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage rate levels.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the Toledo Division of Environmental Services).

(3) 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 Limitation:

10 gallons per day total coating usage

Applicable Compliance Method:

Compliance shall based upon the record keeping specified in d)(2).

b. Emissions Limitation:

4.88 pounds of VOC per gallon of coating

Applicable Compliance Method:

Compliance shall based upon the record keeping specified in d)(3).

If required, the permittee shall demonstrate compliance through the methods and procedures of OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the VOC contents of the coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify



the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

c. Emissions Limitation:

no VOC containing clean up materials or solvents

Applicable Compliance Method:

Compliance shall based upon the record keeping specified in d)(3).

d. Emissions Limitation:

3.66 tons per year of VOC emissions from coatings

Applicable Compliance Method:

This limitation was established to reflect the full potential to emit for this emissions unit based on a maximum coating usage of 1,500 gallons per rolling, 12-month period utilizing a maximum 4.88 pounds of VOC per gallon coating material, as applied, and no VOC containing clean up materials. Compliance shall based upon the record keeping specified in d)(3).

e. Emission Limitation:

0.551 lb of PE per hour

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

$$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$$

Where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.80) based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 4.2.2.4-2. ESTIMATED CONTROL EFFICIENCIES FOR METAL COATING LINES dated 1/95);

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

f. Emission Limitation:

0.01 ton of PE per year

0.01 ton of PM10 per year



Applicable Compliance Method:

These limitations were established to reflect the full potential to emit for this emissions unit based on a maximum application rate of 1,500 gallons per rolling, 12-month period of material. Compliance with the fugitive PE and PM10 limitations shall be determined utilizing factors from AP-42 Table 4.2.2.1-2 TYPICAL DENSITIES AND SOLIDS CONTENTS OF COATINGS as follows: multiply the maximum coating usage rate (1500 gallons per year) by the characteristic enamel density (7.6 pounds per gallon), by the characteristic solids content (0.30 pound of solid per pound of coating), by 1 minus the characteristic transfer efficiency (1-80%), by 1 minus the control efficiency (1-99%) and divide by 2000 pounds per ton.

g) Miscellaneous Requirements

- (1) None.