



State of Ohio Environmental Protection Agency

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Columbus, Ohio 43215

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P.O. Box 1049
Columbus, OH 43216-1049

4/30/2009

GRANT MILLIRON
MILLIRON RECYCLING, INC.
2384 STATE ROUTE 39N
MANSFIELD, OH 44903

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0370010212
Permit Number: P0087557
Permit Type: Renewal
County: Richland

Certified Mail

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

Dear Permit Holder:

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 Ohio EPA DAPC, Northwest District Office. 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
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NWDO

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



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install and Operate
for
MILLIRON RECYCLING, INC.**

Facility ID: 0370010212
Permit Number: P0087557
Permit Type: Renewal
Issued: 4/30/2009
Effective: 4/30/2009
Expiration: 4/30/2019



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
 for
 MILLIRON RECYCLING, INC.

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Final Permit-to-Install and Operate
Permit Number: P0087557
Facility ID: 0370010212
Effective Date: 4/30/2009

Authorization

Facility ID: 0370010212
Application Number(s): A0018562
Permit Number: P0087557
Permit Description: PTIO Renewal for Roadways and a 105 ton/hr Hammermill Shredder.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 4/30/2009
Effective Date: 4/30/2009
Expiration Date: 4/30/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15
This document constitutes issuance to:

MILLIRON RECYCLING, INC.
2384 STATE ROUTE 39N
MANSFIELD, OH 44903

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:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0087557

Facility ID: 0370010212

Effective Date: 4/30/2009

Authorization (continued)

Permit Number: P0087557

Permit Description: PTIO Renewal for Roadways and a 105 ton/hr Hammermill Shredder.

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

Emissions Unit ID:	F001
Company Equipment ID:	Roadways
Superseded Permit Number:	03-13640
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	P901
Company Equipment ID:	Hammermill Shredder
Superseded Permit Number:	03-13640
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0087557

Facility ID: 0370010212

Effective Date: 4/30/2009

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 Ohio EPA DAPC, Northwest District Office in accordance with OAC



rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

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

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0087557

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0087557

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Effective Date: 4/30/2009

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: P0087557

Facility ID: 0370010212

Effective Date: 4/30/2009

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0087557

Facility ID: 0370010212

Effective Date: 4/30/2009

C. Emissions Unit Terms and Conditions



1. F001, Roadways

Operations, Property and/or Equipment Description:

Facility paved and unpaved roadways and parking areas.

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)	9.33 tons fugitive particulate matter (PE) per year <u>Paved Roadways and Parking Areas</u> There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed one minute during any 60 -minute observation period Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [See b)(2)c. and b)(2)e. through b)(2)i.] <u>Unpaved Roadways and Parking Areas</u> There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed three minutes during any 60-minute observation period



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [See b)(2)d. through b)(2)i.]
b.	OAC rule 3745-17-07(B)	See b)(2)j.
c.	OAC rule 3745-17-08(B)	See b)(2)j.

(2) Additional Terms and Conditions

- a. The paved roadways and parking areas that are subject to the terms and conditions of this permit are listed below:

<u>identification:</u>	<u>road segment length:</u>
Parking "A"	0.068 miles
Parking "B"	0.136 miles

- b. The unpaved roadways and parking areas that are subject to the terms and conditions of this permit are listed below:

<u>identification:</u>	<u>road segment length:</u>
Parking "C, D"	0.246 miles

- c. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by sweeping, flushing and watering, at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water, at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.



- f. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- g. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- h. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported. It should be noted that this term and condition does not require ALL open-bodied vehicles to be covered, only those which would result in fugitive dust emissions if the materials were not covered.
- i. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05(A)(3).
- j. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
Parking "A"	once per day of operation
Parking "B"	once per day of operation

<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
Parking "C, D"	once per day of operation

- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.



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

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

e) Reporting Requirements

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

f) Testing Requirements

- (1) Compliance with the emission limitations in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
9.33 tons fugitive PE/yr

Applicable Compliance Method:

The emission limitation was developed by applying a factor of (1-.95) for 95% control efficiency for use of best available control measures to maximum potential uncontrolled particulate emission rates of 3.52 tons for paved roadways and 182.97 tons for unpaved roadways. The maximum potential uncontrolled emission rate for paved roadways was calculated by multiplying an emission factor of 0.64 lb PE per vehicle mile traveled (VMT) (AP-42, section 13.2.1, 09/1998) and a maximum paved VMT of 11,000 miles. The maximum potential uncontrolled emission rate for unpaved roadways was calculated by multiplying an emission factor of 20.33 lbs PE per vehicle mile traveled (VMT) (AP-42,



section 13.2.2, 09/1998) and a maximum unpaved VMT of 18,000 miles. Therefore, provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the ton per year PE limitation will be assumed.

b. Emission Limitation:

There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed one minute during any 60-minute observation period

Applicable Compliance Method:

If required, compliance with the emissions limitation for the paved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR Part 60, Standards of Performance for New Stationary Sources, as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

c. Emission Limitation:

There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed three minutes during any 60-minute observation period

Applicable Compliance Method:

If required, compliance with the emissions limitation for the unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR Part 60, Standards of Performance for New Stationary Sources, as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) None.



2. P901, Hammermill Shredder

Operations, Property and/or Equipment Description:

105 ton/hr hammermill (shredder)

- 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. d)(9) and d)(10).
 - (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)	Control requirements [See b)(2)a.] Opacity restrictions [See b)(2)b.] 0.013 tons mercury (Hg)/yr <u>Fugitive emissions:</u> 8.07 tons particulate emissions (PE)/yr Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. [See sections b)(2)c. through b)(2)f.] <u>Cyclone splitter vent stack emissions:</u> 4.29 lbs PE/hr and 5.58 tons PE/yr
b.	OAC rule 3745-17-07(A)	See b)(2)g.
c.	OAC rule 3745-17-07(B)	See b)(2)h.
d.	OAC rule 3745-17-08(B)	See b)(2)h.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(B)	See b)(2)g.

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) for this emission unit has been determined to be use of a cyclone with a maximum outlet concentration of 0.02 gr/dscf, use of hinge covers for material handling, and water injection for the hammermill.
- b. Visible particulate emissions shall not exceed the following:
 - i. 20% opacity, as a three-minute average for fugitive emissions from the shredding operation;
 - ii. 5% opacity, as a six-minute average from cyclone splitter vent stack and from the material handling/storage operations associated with the shredding line.

- c. The material handling/storage operations that are covered by this permit and subject to the above-mentioned requirements are listed below:

Material Handling (Belt Conveyor Transfer Systems) of Shredded Material
 Truck Loading of Shredded Material
 Storage Piles

- d. The permittee shall employ best available control measures for the above-identified material handling/storage operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

<u>material handling/storage operations</u>	<u>control measures</u>
Material Handling (Belt Conveyor Transfer Systems) of Shredded Material	watering
Truck Loading of Shredded Material	maintain moisture content*
Storage Piles	maintain moisture content*

*If moisture content cannot be maintained which is sufficient enough to ensure compliance with the above-mentioned applicable requirements, the permittee shall apply additional control measures for the purpose of ensuring compliance with the above-mentioned applicable requirements.

- e. For each material handling/storage operation, the above-identified control measures shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures



shall continue during the operation of the material handling/storage operations until further observation confirms that use of the control measure is unnecessary.

- f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05(A)(3).
- g. The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- h. The requirements established pursuant to this rule are equivalent or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) The permittee shall only process vehicles through the hammermill which meet the following requirements:

- a. readily accessible mercury-containing devices located in the trunk and hood of the vehicle have been removed; and
- b. all gas tanks, gasoline, and batteries have been removed; and
- c. readily removable fluids (motor oil, transmission oil, and antifreeze)
- d. The permittee shall not process any materials (including vehicles) through the hammermill which contain Freon or other CFCs/HCFCs.
 - i. The permittee shall not process any materials [except as provided in c)(1) above for vehicles] through the hammermill which contain oil or other liquid material other than water.
 - ii. The maximum annual operating hours for this emissions unit shall not exceed 2,600 per year.
 - iii. The stack on this emissions unit shall be constructed such that it meets the minimum requirements necessary to perform Methods 1-4, of 40 CFR Part 60, Appendix A.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, the permittee shall perform inspections of material handling operations in accordance with the following minimum frequencies:

<u>material handling operations</u>	<u>minimum inspection frequency</u>
Material Handling (Belt Conveyor Transfer Systems) of Shredded Material	each day of operation
Truck Loading of Shredded Material Storage Piles	each day of operation

(2) The purpose of the inspections is to determine the need for implementing control measures for the material handling/storage operations. The inspections shall be



performed during representative, normal material handling/storage operations associated with the shredding line.

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

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

- (5) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the cyclone splitter vent stack 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 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 eliminate the visible emissions.
- (6) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the shredding operation serving this emissions unit. The presence or absence of any visible fugitive 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 weekly 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.

- (7) The permittee shall maintain monthly records of the hours of operation (hours per month and total hours to date from January to December) for this emissions unit.
- (8) The permittee shall document and/or require any supplier of material to document the following for each load of material received for shredding:
 - a. Freon or other CFCs/HCFCs have been removed in accordance with the applicable provisions of 40 CFR Part 82 - Protection of Stratospheric Ozone;
 - b. Oil, or other liquid material other than water have been removed [except for vehicles as provided in d)(8)d.];
 - c. documentation from suppliers of the known amount of mercury-containing devices in the scrap (scrap being defined as any vehicle or non-vehicle related material);
 - d. for vehicles received the permittee shall document that:
 - i. readily accessible mercury-containing devices located in the trunk and hood of the vehicle have been removed. The permittee shall also document when mercury-containing devices were not accessible and the reason the devices were not accessible;
 - ii. gas tanks, gasoline, and batteries have been removed. The permittee shall also document all instances when any gas tanks, gasoline, and/or batteries have not been removed.
 - iii. readily removable fluids (motor oil, transmission oil, and antifreeze) have been removed
- (9) The Permit to Install for this emissions unit P901 was evaluated based on the mercury emissions from the volume source, the shredder, and the design parameters of the shredder opening, as specified by the permittee and the manufacturer in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for mercury emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from



the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Pollutant: Mercury
 TLV (ug/m3): 25
 Maximum Hourly Emission Rate (lbs/hr): 0.0102405
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.985
 MAGLC (ug/m3): 2

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the “Air Toxic Policy” is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the “Air Toxic Policy” will still be satisfied. If, upon evaluation, the permittee determines that the “Air Toxic Policy” will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the “Air Toxic Policy” include the following:

- a. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- b. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in opening height, changes in diameter of opening, etc.).

If the permittee determines that the “Air Toxic Policy” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a “modification” under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

- (10) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the “Air Toxic Policy.”
 - a. a description of the parameters changed (new pollutants emitted, change in exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the “Air Toxic Policy” for the change.

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.

- (2) The permittee shall identify in the PER forms the following information concerning inspection requirements during the 12-month reporting period for this emission unit:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, which was not implemented.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(6) above:
 - a. all days during which any visible fugitive particulate emissions were observed from grain receiving stations and from transferring and conveying operations; and
 - b. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(5) above:
 - a. all days during which any visible particulate emissions were observed from the cyclone splitter vent stack serving this emission unit; and
 - b. any corrective actions taken to eliminate the visible particulate emissions.

f) Testing Requirements

- (1) 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 five years after issuance of this permit.
 - b. The emission testing shall be conducted on the cyclone exhaust to demonstrate compliance with the lbs/hr limitation of PE. Emission testing shall also be conducted on the exhaust to demonstrate no mercury emissions exist.
 - c. The following test method(s) shall be employed to demonstrate compliance with the above emissions limitations: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for Hg, Methods 1-4 and 29 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



- d. The tests shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. 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 Ohio EPA, Northwest District Office refusal to accept the results of the emission test(s).
 - f. Personnel from the Ohio EPA, Northwest District Office 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 Ohio EPA, Northwest District Office 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 Ohio EPA, Northwest District Office.
- (2) 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:
4.29 lbs PE/hr from the cyclone splitter vent stack
5.58 tons PE/yr from the cyclone splitter vent stack

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly emission rate through stack testing using methods and procedures as specified in 40 CFR Part 60, Appendix A, Methods 1-5 on the cyclone exhaust.

The tons per year limitation was developed by multiplying the pounds per hour limitation by an operating restriction of 2600 hours/year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation and the hours of operation restriction, compliance will also be shown with the annual limitation.
 - b. Emission Limitation:
8.07 tons fugitive PE/yr

Applicable Compliance Method:
The emission limitation was established by multiplying an emission factor of 0.05 pounds PE per 1000 pounds of metal shredded (USEPA Speciate 3.0 program, 10/1999), a maximum shredding rate of 210,000 pounds per hour, a maximum



operating schedule of 2,600 hours per year, and a conversion factor of 1 ton per 2000 lbs and then subtracting 5.58 tons PE/yr for emission exhausted from the cyclone. Therefore, provided compliance is shown with the annual operating hours restriction of 2600, compliance with the ton per year fugitive PE limitation for this emissions unit will be assumed.

- c. Emission Limitation:
0.013 tons Hg/year

Applicable Compliance Method:

The annual limitation is based on an emission rate of 0.01 lbs Hg per hour* which was derived from the Maximum Allowable Ground Level Concentration (MAGLC) for mercury as determined by Ohio EPA's Air Toxics Policy. The annual emission limitation is based on the hourly emission rate being multiplied by a maximum annual operating schedule of 2600 hours, and divided by a conversion factor of 1 tons per 2000 pounds. Therefore, provided compliance is shown with the annual operating hours restriction of 2600 and with the requirements of this permit to remove mercury-containing devices [See section f)(1)], compliance with the ton per year Hg limitation for this emissions unit will be assumed.]

*The emission rate of 0.01 lbs Hg per hour represents 58 mercury switches per 100 automobiles at 1 gram Hg per switch with 10% of the total mercury being emitted from the shredder.

- d. Emission Limitation:
Visible fugitive PE from the shredding operation shall not exceed 20% opacity, as a three-minute average

Applicable compliance method:

If required, compliance shall be demonstrated using test method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 1996, with the modifications in paragraphs (a) and (b) of OAC rule 3745-17-03 (B)(3). with U.S. EPA Method 9 of 40 CFR, Part 60, Appendix A.

- e. Emission Limitation:
Visible particulate emissions from the cyclone splitter vent stack and visible fugitive PE from the material handling/storage operations associated with the shredding line shall not exceed 5% opacity, as a six-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated using test method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 1996, with the modifications in paragraphs (a) and (b) of OAC rule 3745-17-03 (B)(3). with U.S. EPA Method 9 of 40 CFR, Part 60, Appendix A.

- g) Miscellaneous Requirements

- (1) None.