



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
FRANKLIN COUNTY  
Application No: 01-08384**

**CERTIFIED MAIL**

**DATE:** 1/29/2002

PSC Metals Inc  
Jim Boysel  
2205 Parsons Ave  
Columbus, OH 43207

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1000** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

CDO

Mid-Ohio Regional Planning Commission



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

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

**DRAFT PERMIT TO INSTALL 01-08384**

Application Number: 01-08384  
APS Premise Number: 0125040225  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: PSC Metals Inc  
Person to Contact: Jim Boysel  
Address: 2205 Parsons Ave  
Columbus, OH 43207

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**2205 Parsons Ave  
Columbus, Ohio**

Description of proposed emissions unit(s):  
**Shredder - Hammermill 74/104 Bulldog.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

**PSC Metals Inc**  
**PTI Application: 01-08384**

**Facility ID: 0125040225**

**Issued: To be entered upon final issuance**

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### **2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### **3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

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information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

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lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule

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3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

#### **14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

#### **15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

### **B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	19.8

PSC Metals Inc  
 PTI / 01-06468  
 Issue

Facility ID: 0125040225

Emissions Unit ID: F001

## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F001 - 50 ton/hr hammermill with water injection system and fluff removal vented to cyclone. Modification of PTI 01-06468	OAC rule 3745-31-05(A)(3)	Particulate emissions shall not exceed 9.9 pounds per hour and 19.8 tons per year. See sections A.2.e.  Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See sections A.2.a through A.2.d.  Visible particulate emissions of fugitive dust shall not exceed 15% opacity, as a 3-minute average.
	OAC rule 3745-17-07(B)(1)	The emissions limitation specified by this rule is less stringent than the above-mentioned control measure requirements.
	OAC rule 3745-17-08(B)(3)	The emissions limitation specified by this rule is less stringent than, or equal in stringency to the above-mentioned control measure requirements.

### 2. Additional Terms and Conditions

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

Scrap shredding and load out

- 2.b The permittee shall employ best available control measures for the above-identified

PSC  
PTI /

Emissions Unit ID: **F001**

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material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure to ensure compliance:

<u>material handling operations</u>	<u>control measures</u>
Scrap shredding	wet suppression
Metal load out	

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

- 2.c** For each material handling operation that is not adequately enclosed, 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 operations until further observation confirms that use of the control measure is unnecessary.
- 2.d** Implementation of the above-mentioned control measure in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- 2.e** The terms in this permit supersede those identified in PTI 01-6468 issued November 6, 1996 and represent a net increase of 9.8 tons PM/yr from this emission unit.

**B. Operational Restrictions**

- Water sprays shall be operated at points necessary to ensure compliance with the visible emission limitations specified above.
- The permittee shall ensure that mercury switches are removed from automobiles and appliances prior to shredding.
- The maximum annual operating hours for this emissions unit shall not exceed 4,000, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation, following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following

**PSC Metals Inc**  
**PTI / 01 00204**  
**Issue**

**Facility ID: 0125040225**

**Emissions Unit ID: F001**

table:

PSC  
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Emissions Unit ID: **F001**

**Issued: To be entered upon final issuance**

<u>Months(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	400
1-2	800
1-3	1200
1-4	1600
1-5	2000
1-6	2400
1-7	2800
1-8	3200
1-9	3600
1-10	4000
1-11	4000
1-12	4000

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

**C. Monitoring and/or Recordkeeping Requirements**

1. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>material handling operations</u>	<u>minimum inspection frequency</u>
Scrap shredding	hourly
Metal load out	daily

2. The above-mentioned inspections shall be performed during representative, normal operating conditions.
3. The permittee may, upon receipt of written approval from the Ohio EPA, CDO, 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;

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- 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 4.d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

5. The permittee shall maintain monthly records of the following information:
  - a. the operating hours for each month; and
  - b. the rolling, 12-month summation of the operating hours.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.

6. The operations log shall be maintained on site.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency; and
  - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels.
3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:  
 Particulate emissions shall not exceed 9.9 lbs/hr.

Applicable Compliance Method:

Compliance shall be determined by multiplying an SCC factor 3-04-007-12 for scrap handling times the maximum process weight rate of 50 tons/hr times control efficiency.

Scrap handling SCC factor 3-04-007-12 : 0.36 lb PM/ton \* 50 tons/hr = 18 lb PM10/hr  
 RACM control efficiencies for shredders Table 2.15.-1

Shredder with water injection 18 lbs PM/hr \* (1 - 0.5 wet suppression) = 9 lbs PM/hr.

Fluff removal with metal to pile 18 lbs PM/hr \* (1- 0.90 cyclone)(1 - 0.5 wet suppression)  
 = 0.9 lbs PM/hr

- b. Emission Limitation:  
 Particulate emissions shall not exceed 19.8 tons per year.

Applicable Compliance Method:

Compliance shall be determined by multiplying the hourly rate by 4,000 hours and dividing by 2,000 pounds per ton.

9.9 lbs PM10/hr \* 4,000 hours\* 1 ton/2,000 pounds = 19.8 tons PM/yr.

- c. Emission Limitation:  
 Fugitive particulate emissions shall not exceed 15% opacity, as a 3-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

**F. Miscellaneous Requirements**

None