



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
FRANKLIN COUNTY**

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 01-06468**

**DATE: 11/19/2002**

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

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

*Michael W. Ahern*

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

CDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 11/19/2002  
Effective Date: 11/19/2002**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-06468

Application Number: 01-06468  
APS Premise Number: 0125040225  
Permit Fee: **\$500**  
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 with enclosure venting to a fabric filter.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## 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

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representative of the Director, upon receipt of a written request and within a reasonable time, any 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 lead to such sanctions

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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

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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 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>
PE	10

**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>	
P901 - 50 ton/hr hammermill with water injection control and fluff removal vented to cyclone.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-08(B)(3)	

**PSC N****PTI A****Modification Issued: 11/19/2002**Emissions Unit ID: **P901**

Applicable Emissions  
Limitations/Control Measures

Particulate emissions (PE) shall not exceed 3.2 lbs PM/hr and 10 tons/yr. See section A.2.e.

Visible PE of fugitive particulate matter shall not exceed 20% opacity for three minutes in sixty 60 minute observation period .

Visible PE of cyclone stack particulate matter shall not exceed 5% opacity for six minutes in sixty 60 minute observation period.

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.

The emissions limitation specified by this rule is less stringent than the above-mentioned control measure requirements.

The emissions limitation specified by this rule is less stringent than 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:

Fluff separation  
Conveyor to stockpile  
Scrap load out

**2.b** The permittee shall employ best available control measures for the above-identified 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>
Fluff separation	enclosure vented to cyclone
Conveyor to stockpile	windbreak
Scrap loadout	windbreak

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 measure s 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 supercede those identified in PTI 01-6468 issued November 6, 1996 due to modified PE control on hammermill and improved fluff separation system.

**B. Operational Restrictions**

1. Water sprays shall be operated at points necessary to ensure compliance with the visible emission limitations specified above.

**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>
Fluff separation	daily
Conveyor to stockpile	daily
Scrap 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 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 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:  
PE shall not exceed 3.2 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 efficiencies.

Scrap handling SCC factor 3-04-007-12 : 0.36 lb PM10/ton \* 50 tons/hr = 18 lb PE/hr

Shredder with water injection: 18 lbs PE/hr \* (1 - 0.98 water injection) = 0.4 lbs PE/hr

Fluff removal - (18 lbs PE/hr - 0.4 lbs PE/hr) \* (1 - 0.9 cyclone) = 1.8 lb PE/hr

Conveyor to stock pile: (18 lbs PE/hr - 2.2 PE/hr) \* (1 - 0.95 wind screen) = 0.6 lb PE/hr

Shredded scrap handling (18 lbs PE/hr - 2.8 lbs/hr) \* (1 - 0.97 wind screen) = 0.4 lb PE/hr

- b. Emission Limitation:  
PE shall not exceed 10 tons per year.

Applicable Compliance Method:

Compliance shall be determined by multiplying the hourly rate by 6,250 hours and dividing by 2,000 pounds per ton.

3.2 lbs PE/hr \* 6,250 hours/yr \* 1 ton/2,000 pounds = 10 tons PE/yr.

- c. Emission Limitation:  
Fugitive PE shall not exceed 20% opacity as a 6-minute average in a 60 minute observation period.

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).

- d. Emission Limitation:  
The cyclone stack PE shall not exceed 5% opacity as a 6-minute average in a 60 minute observation period.

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

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**PSC M**

**PTI A**

**Modification Issued: 11/19/2002**

Emissions Unit ID: **P901**

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 01-06468 Facility ID: 0125040225

FACILITY NAME PSC Metals Inc

FACILITY DESCRIPTION Shredder with enclosure venting to a fabric filter CITY/TWP Columbus

SIC CODE 5093 SCC CODE EMISSIONS UNIT ID P901

EMISSIONS UNIT DESCRIPTION Auto shredder with enclosure venting to fabric filter 50 ton/hr hammermill with water injection control and fluff removal vented to cyclone.

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment			3.2	10
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?  
Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

**ADMINISTRATIVE MODIFICATION**  
**inter-office communication**

to: Mike Hopkins, DAPC, Air Quality Modeling and Planning

from: John Kirwin through Mark Hartman, DAPC, CDO

**NEW**  
**PTI T**  
**FACI**

FACILITY DESCRIPTION Shredder with enclosure venting to a fabric filter CITY/TWP Columbus Emissions Unit ID: **P901**

**subject:** Administrative Modification of Permit To Install 01-06468 PSC  
 Metals

**date:** July 11, 2002

Choose one:

Initiated by: a. Permittee  b. DO/laa

**SUMMARY** (for informational purposes only)

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

**Pollutant**

PE

**Tons Per Year**

10

**Please provide a fairly detailed description of the basis for the modification and how the permit is being modified:**

This modification deletes references to the shredder venting to a bag house. PSC installed a Texas Shredder water injection system to control PE from the shredder and demonstrated compliance with the RACM opacity using Method 9. PSC also submitted analytical data to shows lead and mercury levels at less than detection in fluff at shredding operations. The allowable opacity from the shredder is being set at more stringent than rule, based on opacity observations submitted by PSC.

*Additional comments:*

**Please consult with Paul Koval regarding any proposed limitation on lead or mercury.**

**NEW**  
PTI T  
FACI

FACILITY DESCRIPTION

Shredder with enclosure venting to a fabric  
filter

CITY/TWP

Emissions Unit ID: **P901**

Columbus