



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: 01-08364

DATE: 7/3/2001

Columbus Auto Shredding Inc
Randall Hall
Route 4 Box 293-A
Marietta, OH 45750

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,

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

CC: USEPA

CDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: 7/3/2001
Effective Date: 7/3/2001**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-08364

Application Number: 01-08364
APS Premise Number: 0125042453
Permit Fee: **\$1000**
Name of Facility: Columbus Auto Shredding Inc
Person to Contact: Randall Hall
Address: Route 4 Box 293-A
Marietta, OH 45750

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2181 Alum Creek Dr
Columbus, Ohio**

Description of proposed emissions unit(s):
65 TPH hammermill.

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 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

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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

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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).

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- 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>
P E	6.1

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>	
F002 - Material Handling-scrap metal loadout (65 tons/hr) Modified	OAC rule 3745-31-05 (A)(3)	OAC rule 3745-17-07(B)(3)
		OAC rule 3745-17-08(B)(3)

Column**PTI A****Modification Issued: 7/3/2001**Emissions Unit ID: **F002**

Applicable Emissions
Limitations/Control Measures

Particulate emissions shall not exceed 1.4 pounds per hour and 6.1 tons per year.

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.d).

There shall be no visible particulate emissions of fugitive dust from the building vents and openings during auto shredding and scrap load out, as determined in accordance with paragraph (B)(4) of OAC rule 3745-17-03.

The emissions limitation specified by this rule is less stringent than, or equal in stringency to, the above-mentioned control measure requirements.

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 handling and 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:

material handling operations

control measures

Scrap handling and load out

wet suppression

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.

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>
Scrap handling and 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 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;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
 - c. the dates the control measure(s) was (were) 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.

D. Reporting Requirements

1. The permittee shall submit 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 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 1.4 pound per hour.

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 65 tons/hr times control efficiencies. Scrap handling SCC factor 3-04-007-12 : 0.36 lb PM10/ton * 65 tons = 23.4 lb PM10/hr RACM control efficiencies for iron production Table 2.2.2.-2. #3
 $23.4 \text{ lbPM/hr} * (1-0.80 \text{ enclosure}) * (1-0.95 \text{ wet suppression}) = 0.23 \text{ lb particulate emissions/hr}$

$23.4 \text{ lbPM/hr} * (1 -0.95 \text{ wet suppression}) = 1.17 \text{ lb particulate emissions/hr.}$

$23.4 \text{ lbPM/hr} * (1-1 \text{ enclosure}) * (1 -0.95 \text{ wet suppression}) = 0 \text{ lb particulate emissions/hr}$

- b. Emission Limitation:

Particulate emissions shall not exceed 6.1 ton per year.

Applicable Compliance Method:

Compliance shall be determined by multiplying the hourly rate by 8,760 hours and dividing by 2,000 pounds per ton.

$1.4 \text{ lbs particulate emissions/hr} * 8,760 \text{ hours} * 1 \text{ ton}/2,000 \text{ pounds} = 6.1 \text{ tons particulate emissions per year.}$

- c. Emission Limitation:

There shall be no visible particulate emissions of fugitive dust from the building vents and openings during auto shredding and scrap load out, as determined in accordance with paragraph (B)(4) of OAC rule 3745-17-03.

Column

PTI A

Modification Issued: 7/3/2001

Emissions Unit ID: **F002**

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 22, and the procedures specified in OAC rule 3745-17-03(B)(4).

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 01-08364

Facility ID: 0121010243

0125042453

FACILITY NAME The Nippert Company Columbus Auto Shredding Inc

FACILITY DESCRIPTION Header 12. 65 TPH hammermill CITY/TWP Delaware Columbus

SIC CODE 5093 SCC CODE 3-03-024-08 EMISSIONS UNIT ID F002

EMISSIONS UNIT DESCRIPTION Material Handling-scrap metal loadout (65 tons/hr)

DATE INSTALLED May, 2001

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	0.14	0.61	1.4	6.1
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		n/a	n/a	n/a	n/a
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES: OAC rule 3745-21-09 (U)(2)(e), OAC rule 3745-31-05 (A)(3)

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Enter Determination Use of wet suppression at hammer mill, building enclosure and magnetic separation. PTO template 127

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

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 X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 01-08364

Facility ID: 0121010243

0125042453

FACILITY NAME The Nippert Company Columbus Auto Shredding Inc

FACILITY DESCRIPTION Header 12. 65 TPH hammermill CITY/TWP Delaware Columbus

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	0000000c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

Columbus Auto Shredding PTI 01-08364 Template 127

A. General Information:

Columbus Auto Shredding, Inc. proposes to install a scrap automobile shredder at 2181 Alum Creek Drive, Columbus in southeast Franklin County. The 65 ton/hr hammermill employs wet suppression at 120 gallons per minute plus operation within a building to control fugitive emissions. In addition, all unloading, loading, and stockpiling operations will also be enclosed within a building. The application included calculations for scrap handling and load out of shredded metals with greater than de minimis levels. Roadways and parking areas had been previously permitted under PTI 01-08242.

B. Applicable Rules

OAC rule 3745-31-05(A)(3) -

Columbus Auto Shredding is located in an Appendix A area and the provisions of OAC rule 3745-17-08 are applicable. Columbus Auto shredding will construct a building enclosure to contain emissions with no venting to the outside during raw scrap unloading and shredding with 120 gallons per minute wet suppression techniques to control fugitive dust. For scrap handling outside the enclosure, daily monitoring for visible emissions is proposed under OAC rule 3745-31-05 to ensure no visible particulate emissions. The hourly particulate emissions rate for both shredding and scrap handling was calculated using comparable SCC emission factors and calculated at the maximum process weight rate, while annual rate is based on operations during 8,760 hours per year.

OAC rule 3745-17-07(A)(1)(a)

NEW SOURCE REVIEW FORM B

PTI Number: 01-08364

Facility ID: 0121010243
0125042453

FACILITY NAME The Nippert Company Columbus Auto Shredding Inc

FACILITY DESCRIPTION Header 12. 65 TPH hammermill CITY/TWP Delaware Columbus

There are no stacks associated with this facility, so that this rule is not applicable.

OAC rule 3745-17-07(B)(1)

The no visible fugitive emission limit is more stringent than required by this rule.

OAC rule 3745-17-08(B)(3)

Columbus Auto Shredding is located in a RACM area, These sources are enclosed and controlled with wet suppression.

Fee

Columbus Auto Shredding operates under SIC code of 5093 with at a maximum process weight rate of 65 ton/hr, resulting in a fee of \$1,000.

Calculations

Compliance shall be determined by summing the calculated hourly emission rate using emission SCC emission factors and percent control efficiencies specified in the Ohio EPA RACM document for iron ore processing:

Scrap handling - shredded SCC factor 3-04-007-12 : 0.36 lb PM10/ton * 65 tons = 23.4 lb PM10/hr
 RACM control efficiencies for iron production Table 2.2.2.-2. #3
 load onto pile 23.4 lbPM10/hr * (1-0.80 enclosure) * (1 -0.95 wet suppression) = 0.23 lb PM10/hr.
 loading out 23.4 lbPM10/hr * (1 -0.95 wet suppression) = 1.17 lb PM10/hr.
 wind erosion 23.4 lbPM10/hr * (1-1 enclosure) * (1 -0.95 wet suppression) = 0 lb PM/hr

0.23 lb PM10/hr + 1.17 lb PM10/hr = 1.4 lb PM10/hr

1.4 lb PM10/hr* 8,760 hours* 1/2,000 pounds per ton = 6.13 ton PM10 per year

Shredding tertiary high moisture - SCC factor 3-03-024-07 : 0.06 lb PM/ton * 65 tons = 3.9 lb PM/hr
 0.02 lb PM10/ton * 65 tons = 1.3 lb PM/hr
 3.9 lb PM/hr * (1- 0.99 enclosure) = 0.04 lb PM/hr
 0.04 lb PM/hr * 8,760 hours* 1 ton/2,000 pounds = 0.18 ton PM per year

Please complete for these type permits ([For PSD/NSR Permit, place mouse over this text](#)): Synthetic Minor Determination and/or Netting Determination

Permit To Install ENTER PTI NUMBER HERE

NONE

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

NEW SOURCE REVIEW FORM B

PTI Number: 01-08364

Facility ID: 0121010243
0125042453

FACILITY NAME The Nippert Company Columbus Auto Shredding Inc

FACILITY DESCRIPTION Header 12. 65 TPH hammermill CITY/TWP Delaware Columbus

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant

Tons Per Year

PE