

Facility ID: 0215090338 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0215090338 Emissions Unit ID: F001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Scrap metal torch cutting operations	OAC rule 3745-31-05(A)(3) PTI No. 17-1651	1.0 ton per year of particulate emissions. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-08(B) and 3745-17-07(B)(1).
	OAC rule 3745-17-07(B)(1)	Visible particulate emissions shall not exceed twenty percent (20%) opacity as a three-minute average.
	OAC rule 3745-17-08	See Additional Terms and Conditions A.2.a.

2. Additional Terms and Conditions

- (a) The permittee shall employ accepted practices, when cutting torches are being used, to minimize resulting visible particulate emissions. Such practices shall include, but not be limited to, the following: cutting metal that is clean of any oil(s) or other combustible fluids, the minimization of flame impingement with the ground, and the use of the appropriately sized cutting torch(es).

B. Operational Restrictions

1. The permittee shall have fire extinguishers of the appropriate type located near any cutting location(s) and they shall be employed promptly to extinguish any accidental fires caused by cutting operations.
2. In accordance with OAC rule 3745-19-03, any open burning of solid waste at this facility/location is prohibited. Any accidental fires that may be caused by the torch cutting operations shall be reported to the Ohio EPA, Northeast District Office.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain an annual log of the amounts and types of metals that have been cut during that period.

D. Reporting Requirements

1. The permittee shall report any and all accidental fires that may be caused by the torch cutting operations at this facility. A written report shall be submitted to the Ohio EPA, Division of Air Pollution Control, Northeast District Office no later than 15 days following the incident.

E. Testing Requirements

1. Emission Limitation:
20% opacity for visible particulate emissions, based on a three-minute average

Applicable Compliance Method:
Compliance with the visible emission limitation shall be determined in accordance with Test Method 9 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)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.
2. Emission Limitation:
1.0 ton per year of particulate emissions

Applicable Compliance Method:

To determine compliance with the annual particulate emission limit, the following equation shall be used:

$$E(\text{tpy}) = (\text{Annual amount of scrap processed (tons of metal processed annually)} * EF) / 2,000 \text{ pounds per ton}$$

Where:

E = Particulate emissions (tons per year)

EF = Emission factor of 0.1 lb of PE/ton of metal processed (from AP-42 (Fifth Edition, 1/95), Section 12.5, Table 12.5-1)

F. Miscellaneous Requirements

1. None

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Facility ID: 0215090338 Emissions Unit ID: F002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Unpaved roadways and parking areas	OAC rule 3745-31-05(A)(3) PTI No. 17-1651	No visible particulate emissions except for 3 minutes during any 60-minute period
		Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.g)
	OAC rule 3745-17-07 (B)(5)	14.4 tons per year of particulate emissions
	OAC rule 3745-17-08 (B), (B)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:
 - unpaved roadways:
All unpaved roadways
 - unpaved parking areas:
All unpaved parking areas
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.
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 an 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.
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 using appropriate dust control measures 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 a visible emission limitation of no visible particulate emissions except for one minute during any 60-minute period.

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.

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.

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.

B. Operational Restrictions

1. The permittee shall not apply used oil as defined by OAC rule 3745-279-01(A)(12) as a dust suppressant to the roadways and/or parking areas.

C. Monitoring and/or Record Keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of each of the unpaved roadway segments and parking areas in accordance with the following frequencies:

unpaved roadways minimum inspection frequency
All unpaved roadway segments Daily

unpaved parking areas minimum inspection frequency
All unpaved parking areas Daily

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 Ohio EPA Northeast 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, 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 4.d. 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, 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, 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 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.

2. Emission Limit:
14.4 tons per year particulate emissions

Applicable Compliance Method:

Compliance shall be based on emission factors outlined in AP-42, Section 13.2.2 (Fifth Edition, 01/95) using the following equations:

$$EF \text{ (lb/VMT)} = [(k * (s/12)^a * (W/3)^b / (M/0.2)^c] * [(365 - p) / 365]$$

Where:

EF = Emission factor (lb/VMT)

k = Particle size multiplier (10 lb/VMT for PM)

s = 6.0% (AP-42, Section 13.2.2, Table 13.2.2-1)

a = 0.8 (AP-42, Section 13.2.2, Table 13.2.2-2)

b = 0.5 (AP-42, Section 13.2.2, Table 13.2.2-2)

c = 0.4 (AP-42, Section 13.2.2, Table 13.2.2-2)

W = mean vehicle weight (tons)

M = 0.2% (material moisture content)

p = 150 days

E (tons/yr) = [EF * Annual vehicle miles traveled * (1 - (CE/100))] / 2,000 pounds per ton

Where:

EF = emission factor (lb/VMT)

Annual vehicles miles traveled (VMT/yr)

CE = Control efficiency (50% for watering roadways and parking areas)

F. **Miscellaneous Requirements**

1. None