

Synthetic Minor Determination and/or Netting Determination

Permit To Install: **02-22342**

A. Source Description:

A steel shredder powered by a 799 hp engine.

B. Facility Emissions and Attainment Status

The facility is a Title V Facility located in a non-attainment area for ozone.

C. Source Emissions

The PTE of NO_x, from the engine, is sufficient enough that the facility would fall into LAER. This is not desired, so the facility is willing to restrict hours of operation for the diesel engine. The facility is looking into having the unit electrically powered. At which point the generator would no longer be the primary source of power.

D. Conclusion

Issue the permit



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
LORAIN COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

Application No: 02-22342

Fac ID: 0247050278

DATE: 1/2/2007

Ross Incineration Services Inc
Patricia Lawson
150 Innovation Drive
Elyria, OH 44035

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, 43216-1049.

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 **\$200** 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.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NEDO

LORAIN COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **02-22342** FOR AN AIR CONTAMINANT SOURCE FOR
Ross Incineration Services Inc

On 1/2/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Ross Incineration Services Inc**, located at **36790 Giles Road, Grafton, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-22342:

Shear metal shredder with diesel engine.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087
[(330)425-9171]



**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 02-22342

Application Number: 02-22342
Facility ID: 0247050278
Permit Fee: **To be entered upon final issuance**
Name of Facility: Ross Incineration Services Inc
Person to Contact: Patricia Lawson
Address: 150 Innovation Drive
Elyria, OH 44035

Location of proposed air contaminant source(s) [emissions unit(s)]:
**36790 Giles Road
Grafton, Ohio**

Description of proposed emissions unit(s):
Shear metal shredder with diesel engine.

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

Laura Powell
Interim Director

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Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0247050278

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

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 (i.e., postmarked) quarterly 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,

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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 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.

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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 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 ninety (90) days after commencing operation of the emissions unit(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>
Particulates	29.43
Nitrogen Oxides	14.58
Carbon Monoxide	1.93

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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.

Operations, Property, and/or Equipment - (P006) - Steel shredder (Rated at 21 tons per hour) and attached 799 hp diesel generator.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	<p>Emissions of nitrogen oxides, from combustion, shall not exceed 79.82 pounds per day and 14.58 tons per rolling, 12-month period.</p> <p>Emissions of carbon monoxide, from combustion, shall not exceed 10.56 pounds per day and 1.93 tons per year.</p> <p>Fugitive particulate emissions shall not exceed 29.43 tons per year.</p> <p>Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.</p> <p>See section A.2.a below.</p>
OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input.
OAC rule 3745-17-08(B)	Exempt (the facility is not located within an Appendix A area)
OAC rule 3745-17-07(A)	Exempt (the facility is not located within an Appendix A area)

2. Additional Terms and Conditions

- 2.a The diesel generator that powers this emissions unit shall not operate more than 8 hours per calendar day.

B. Operational Restrictions

1. The permittee shall implement the fugitive particulate suppression system if the permittee determines that visible particulate emissions may exceed the applicable

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visible emissions limitation.

2. The emissions of nitrogen oxides from this emissions unit shall not exceed 14.58 tons per year, based upon a rolling, 12-month summation of the nitrogen oxide emissions.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of Nitrogen Oxide (Tons)</u>
1	1.21
1-2	2.43
1-3	3.64
1-4	4.86
1-5	6.07
1-6	7.29
1-7	8.50
1-8	9.72
1-9	10.93
1-10	12.15
1-11	13.36
1-12	14.58

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for nitrogen oxides shall be based upon a rolling, 12-month summation of the monthly emissions.

3. The permittee shall only process inherently moist material through the shredder. The material exiting the incinerator is considered to be inherently moist so long as the material passes through the water curtain at the egress of the incinerator.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall record the amount of material loaded into the steel shredder on a daily basis.
2. The permittee shall maintain daily records of the operating hours for the diesel generator that powers the steel shredder.

Emissions Unit ID: **P006**

3. The permittee shall maintain daily records of the operating hours for the steel shredder.
4. The permittee shall perform daily checks, when the emissions unit is in operation, to determine if the visible fugitive particulate emissions suppression system needs to be employed.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify all times the fugitive particulate suppression system was not operating and visible fugitive emissions exceeded the applicable limitation.
2. The permittee shall submit annual reports that identify any exceedances of the daily operating hours limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for nitrogen oxides and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, section A of this permit.

E. Testing Requirements

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

- a. Emission Limitation:

Emissions of nitrogen oxides, from combustion, shall not exceed 79.82 pounds per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following equation and the manufacturer's supplied NOx emission factor of 5.67 grams per horsepower hour:

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$$E_{\text{NOx}} = (5.67 \text{ grams/hp.hr}) \times (1 \text{ lb}/454 \text{ grams}) \times (799 \text{ hp}) \times (H)$$

where:

E_{NOx} = nitrogen oxides emissions from combustion, in lbs/day;
5.67 grams/hp.hr = manufacturer-supplied NOx emission factor;
454 grams = conversion factor from grams to lbs;
799 = hp of diesel generator; and
H = operating hours, in hours/day.

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b. Emission Limitation:

Emissions of nitrogen oxides, from combustion, shall not exceed 14.58 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following equation:

$$E_{\text{monthly NO}_x} = [(5.67 \text{ grams/hp.hr}) \times (799 \text{ hp}) \times (1 \text{ lb}/454 \text{ grams}) \times (H)] / 2000 \text{ lbs/ton}$$

where:

$E_{\text{monthly NO}_x}$ = the NO_x emission rate, in tons per month;
 5.67 grams/hp.hr = manufacturer-supplied NO_x emission factor;
 454 grams = conversion factor from grams to lbs;
 799 = hp of diesel generator;
 H = operating hours, in hours/month; and
 2000 lbs/ton = conversion factor from lbs to tons.

$E_{\text{monthly NO}_x}$ shall be added to the NO_x emissions, in tons per month, for the previous 11 months for the rolling, 12-month summation.

c. Emission Limitation:

Emissions of carbon monoxide, from combustion, shall not exceed 10.56 pounds per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following equation and the manufacturer-supplied CO emission factor of 0.75 gram per horsepower hour:

$$E_{\text{CO}} = (0.75 \text{ gram/hp.hr}) \times (1 \text{ lb}/454 \text{ grams}) \times (799 \text{ hp}) \times (H)$$

where:

E_{CO} = carbon monoxide emissions from combustion, in lbs/day;
 0.75 gram/hp.hr = manufacturer-supplied CO emission factor;
 454 grams = conversion factor from grams to lbs;
 799 = hp of diesel generator; and

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Emissions Unit ID: P006

H = operating hours, in hours/day.

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d. Emission Limitation:

Emissions of carbon monoxide, from combustion, shall not exceed 1.93 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following equation:

$$E_{\text{annual CO}} = [(0.75 \text{ gram/hp.hr}) \times (799 \text{ hp}) \times (1 \text{ lb}/454 \text{ grams}) \times (H)] / 2000 \text{ lbs/ton}$$

where:

$E_{\text{annual CO}}$ = the CO emission rate, in tons per year;
 0.75 gram/hp.hr = manufacturer-supplied CO emission factor;
 454 grams = conversion factor from grams to lbs;
 799 = hp of diesel generator;
 H = operating hours, in hours/year; and
 2000 lbs/ton = conversion factor from lbs to tons.

e. Emission Limitation:

Visible emissions shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing visible emission observations in accordance with the procedures specified in Method 9 of 40 CFR, Part 60, Appendix A.

f. Emission Limitation:

Fugitive particulate emissions shall not exceed 29.43 tons per year.

Applicable Compliance Method:

Compliance shall be determined by using the following equation:

$$E = [(0.32) \times (P)] / 2000$$

where:

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Emissions Unit ID: **P006**

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E = fugitive particulate emission rate, in tons per year;

0.32 = emission rate estimated from a stack test conducted on a similar source, pounds of particulate emissions per ton of material processed;

P = production rate, tons of material processed per year; and

2000 = conversion factor, pounds per ton.

F. Miscellaneous Requirements

None