



State of Ohio Environmental Protection Agency

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**RE: FINAL PERMIT TO INSTALL MODIFICATION**

**CERTIFIED MAIL**

**BUTLER COUNTY**

**Application No: 14-05296**

**Fac ID: 1409010908**

**DATE: 6/10/2008**

IMS Division, Tube City IMS  
Michael Connolly  
1155 Business Center Drive  
Horsham, PA 19044

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Sincerely,

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

CC: USEPA

HCDES



## FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-05296

Application Number: 14-05296  
Facility ID: 1409010908  
Permit Fee: **\$450**  
Name of Facility: IMS Division, Tube City IMS  
Person to Contact: Michael Connolly  
Address: 1155 Business Center Drive  
Horsham, PA 19044

Location of proposed air contaminant source(s) [emissions unit(s)]:

**3024 Oxford State Rd  
Middletown, Ohio**

Description of proposed emissions unit(s):

**Modification of Basic Oxygen Furnace Slag Processing Plant.**

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

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Chris Korleski  
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

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, 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.

**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 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**

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>
PM	3.68
PM-10	1.74



- ii. All radial stacking conveyor drop points.
  - iii. Vibrating grizzly feeder.
  - iv. Single, double and triple deck screens.
  - v. Railcar and truck loading.
  - vi. Crusher and associated conveyors.
- 2.b** Visible particulate emissions from any crusher, feeder, screen, conveyor or transfer point shall not exceed 10 percent opacity, as a six-minute average.
- 2.c** 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(s) to ensure compliance:

<u>material handling operation(s)</u>	<u>control measure(s)</u>
Vibrating Grizzly Feeder	Use of a dedicated water spray when not raining for the grizzly feeder such that the applied water either by the use of the dedicated water spray and/or rain conditions wet the slag feed material to ensure that the applied water meets the visible emission limitation.
	Minimize front end loader bucket-to-feeder drop height.
All screens	Use of dedicated water spray when not raining at each screen such that the applied water either by the use of the dedicated water spray and/or rain conditions meets the visible emission limitation.
	Minimize drop height.
Crusher	Use of dedicated water spray when not raining at the crusher such that the applied water either by the use of the dedicated water spray and/or rain conditions meets the visible emission limitation.

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**IMS Division, Tube City IMS**

**PTI Application: 14-05296**

**Modification Issued: 6/10/2008**

**Facility ID: 1409010908**

**Emissions Unit ID: F001**

Minimize drop height.

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

- 2.d** For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the daily checks conducted pursuant to the monitoring section of this permit, that the control measure(s) is (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 operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- 2.e** Compliance with OAC rule 3745-31-05 (A)(3) shall be demonstrated by using water sprays at each feeder, screen and crusher, the production limitation and compliance with the visible emission limitations specified above.
- 2.f** The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limitations.

## **B. Operational Restrictions**

- 1. All feeders, screens and crusher identified in term A.2.c, above within the processing plant shall be equipped with a dedicated water spray.
- 2. The maximum annual production rate for this emissions unit shall not exceed 1,095,000 tons per year, based upon a rolling, 12-month summation of the production rates.

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

- 1. Except as otherwise provided in this section, for all screens, grizzly feeder and crusher material handling operations that are not adequately enclosed, the permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., any feeder, crusher or screen, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- 2. The permittee shall maintain monthly records of the following information:
  - a. The production rate for each month.
  - b. The rolling, 12-month summation of the production rates.

#### **D. Reporting Requirements**

- 1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., any crusher, screen, conveyor or transfer point, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous six-month periods.
- 2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate limitation in term B.2. If no exceedances occurred during the reporting period then a report is required stating so.
- 3. 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 visible particulate emission limitations shall be determined by Method 9, 40 CFR Part 60 Appendix A.
- 2. Compliance with the hourly and annual PM/PM-10 emission limitations shall be determined through the following methods using the following equations and emission factors:

Conveyor transfer points =  $4.8 \times 10^{-5}$  lb of PM-10/ton material processed, 0.000101 lb of PM/ton material processed. (Based on AP-42, Table 11.19.2-2, 1/95,  $PM=2.1 \times PM-10$ ) - Ht

Feeder loading = 0.000531 lb of PM-10/ton material processed, 0.001122 lb of PM/ton material processed. (Based on AP-42, Section 13.2.4.3, 1/95, U = 7.17 mph, M = 0.92%, 90% control for watering) - Hf

Screening = 0.00084 lb of PM-10/ton material processed, 0.001764 lb of PM/ton material processed. (Based on AP-42, Table 11.19.2-2, 1/95,  $PM = 2.1 \times PM-10$ ) - Hs

Crusher = 0.00059 lb of PM-10/ton material processed, 0.001239 lb of PM/ton material processed. (Based on AP-42, Table 11.19.2-2, 1-95 -  $PM = 2.1 \times PM-10$ ) - Hc

Htotal = Ht + Hf + Hs + Hc

where:

Htotal = the total hourly emissions for all transfer points, feeder, screens and crushers. Ht, Hf, Hs and Hc shall be found individual through the above equations.

Atotal = At + Af + As + Ac

where:

Atotal = total annual emissions for all transfer points, feeder, screens and crushers. At, Af, As and Ac shall be found individually through the equations for Ht, Hf, Hs and Hc and replacing the hourly production rates by annual production rates.

- 3. Compliance with the production rate limitation in term B.2 shall be demonstrated by the recordkeeping in term C.2.

**F. Miscellaneous Requirements**

- 1. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emissions unit contained in permit to install 14-05296 as issued on May 28, 2002.

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05296

Facility ID: 1409010908

FACILITY NAME IMS Division, Tube City IMS

FACILITY DESCRIPTION The facility is modifying the existing BOF slag processing plant by adding a cone crusher and conveyor to the process  
 CITY/TWP Middletown

SIC CODE 3295 SCC CODE 3-05-888-04 EMISSIONS UNIT ID F001

EMISSIONS UNIT DESCRIPTION Modification of BOF slag processing plant a new cone crusher and conveyor are being added to the process

DATE INSTALLED 1/00

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	4.0	3.68	4.0	3.68
PM <sub>10</sub>	Attainment	1.9	1.74	1.9	1.74
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?**

BAT for emissions unit F001 is satisfied by compliance with the visible emissions limitations and the use of water sprays at each feeder and screen, including the new cone crusher and conveyors and the production limitation..

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: