



State of Ohio Environmental Protection Agency

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Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL  
SUMMIT COUNTY  
Application No: 16-02518  
Fac ID: 1677010399**

**DATE: 6/10/2008**

Metalico Akron, Inc.  
Jeff Bauer  
943 Hazel St  
Akron, OH 44309

**CERTIFIED MAIL**

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

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

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* 

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

CC: USEPA

ARAQMD



Permit To Install  
Terms and Conditions

Issue Date: 6/10/2008  
Effective Date: 6/10/2008

**FINAL PERMIT TO INSTALL 16-02518**

Application Number: 16-02518  
Facility ID: 1677010399  
Permit Fee: **\$200**  
Name of Facility: Metalico Akron, Inc.  
Person to Contact: Jeff Bauer  
Address: 943 Hazel St  
Akron, OH 44309

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**943 Hazel Street  
Akron, Ohio**

Description of proposed emissions unit(s):  
**Off-Spec Used Oil Burner, Engine Block Breaker.**

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

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>
PE	5.30
NO <sub>x</sub>	6.57
SO <sub>2</sub>	18.5
lead	0.257

**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 -(B001) - Used oil burner.** Off-specification used oil (as defined by Ohio Administrative Code (OAC) Chapter 3745-279) generated on-site from an associated engine block breaking operation is burned for energy recovery to heat water for cleaning metal reclaimed from crushed engine blocks. Installed 1987 (with no reported subsequent OAC rule 3745-31-01(PPP) physical or operational modifications), B001, designed and fabricated by the facility, has a rated heat input capacity of 3.021 million Btu per hour and a maximum fuel usage rate of 57 gallons per hour.

Particulate emissions (PE) and emissions of 10-micrometer aerodynamic diameter particulate matter (PM<sub>10</sub>) are controlled by a cyclone/fabric filter (baghouse). The facility has a letter report from an independent professional engineer that indicates the baghouse serving this emissions unit is integral to B001, in that it is the principal combustion air source/used oil feed controller for the emissions unit. Essentially, B001 cannot burn used oil without its associated baghouse in operation. Therefore, potential emissions are determined at the baghouse exhaust. Based upon an October 6, 2004 stack test, potential emissions of PE and PM<sub>10</sub> are each reportedly 0.72 pound per hour and 3.15 tons per year (all PE is considered PM<sub>10</sub>), making this facility a natural minor source of PM<sub>10</sub>. During the same stack test, lead emissions tested at the baghouse exhaust were reported at 0.0005 pound per hour. Based upon the application, this facility is also a natural minor source of hazardous air pollutants (HAP), carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), volatile organic compounds (VOC), and sulfur dioxide (SO<sub>2</sub>). Furthermore, from the application, CO and VOC emissions are de minimis per OAC rule 3745-15-05.

This permit, PTI 16-02518, replaces PTI 16-00529 (issued final May 11, 1988) and corrects deficiencies, adds and modifies terms and emissions limits, and requires toxic air contaminant dispersion modeling. Since potential emissions are below all applicable major source thresholds, this permit can proceed as a direct final action.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Stack emissions shall not exceed the following limits when burning used oil:  PE: 1.21 pounds per hour and 5.30 tons per year; NO <sub>x</sub> : 1.50 pounds per hour and 6.57 tons per year; SO <sub>2</sub> : 4.22 pounds per hour and 18.5 tons per year; and lead: 0.0587 pound per hour and 0.257 ton per year.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	<p>Lead and SO<sub>2</sub> emissions, as well as emissions of arsenic, barium cadmium, chromium, mercury, PCBs, and total halogens, are limited by the fuel specifications in A.2.d below.</p> <p>Compliance with the above PE and lead emissions limits requires the continuous use of the baghouse serving this emissions unit, as specified in the application, at all times the emissions unit is in operation.</p> <p>Although air dispersion modeling of the emissions from B001 may indicate compliance with the national ambient air quality standard (NAAQS) for lead, a criteria pollutant, the permittee must, in addition to complying with NAAQS requirements, comply with the air dispersion modeling requirements of Ohio Revised Code (ORC) 3704.03(F) "Toxic Air Contaminant Statute" and must maintain emissions of lead and any other toxic air contaminant listed in OAC rule 3745-114-01 under any applicable maximum allowable ground level concentration (MAGLC).</p> <p>Justification for the ORC 3704.03(F) modeling requirement in this permit for emissions of lead is based upon critical factors, including the emissions unit's exhaust parameters, lead threshold limit value (TLV) of 0.05 mg/m<sup>3</sup>, and an estimated maximum lead emissions rate of 0.0587 pound per hour (0.257 ton per year), as specified in the application, that cause a Screen-3 modeled ground level concentration of over 80% of the applicable maximum allowable ground level concentration (MAGLC).</p> <p>The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-07(B), 3745-17-08(B), 3745-17-10(C)(1), 3745-18-06(B), 3745-21-07(B), 3745-21-08(B), 3745-23-06(B), 3745-71-05, 3745-114-01, and ORC 3704.03(F).</p>
OAC rule 3745-17-07(A)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-17-07(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	Visible emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average.
OAC rule 3745-17-08(B) (applicable only if this emissions unit is located in an area identified in Appendix A of OAC rule 3745-17-08)	The permittee shall employ enclosures, hoods, ducts, fans, and other equipment to adequately enclose, contain, and capture emissions of fugitive dust, and vent the captured dust to a baghouse. The collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
OAC rule 3745-17-10(C)(1)	PE for the fuel burning equipment described in the application shall not exceed the allowable emission rate specified by "Curve P-1" of "Figure I", from the Appendix of OAC rule 3745-17-10, or shall not exceed 0.4 pound per million Btu.
OAC rule 3745-18-06(B)	Pursuant to OAC rule 3745-18-06(B), this emissions unit, which has a rated heat input capacity less than ten MM Btu per hour, is exempt from paragraphs (D), (F), and (G) of OAC rule 3745-18-06 and from rules 3745-18-07 to 3745-18-94 of the Administrative Code.
OAC rule 3745-21-07(B)	The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-07(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-08(B)	<p>The permittee satisfies the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08, by complying with the best available technology requirements of OAC rule 3745-31-05(A)(3).</p> <p>On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to US EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and US EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.</p>

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-23-06(B)	<p>The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC paragraph 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC paragraph 3745-31-05(A)(3) in this permit-to-install.</p> <p>On February 15, 2005, OAC rule 3745-23-06 was rescinded and is no longer part of State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision the SIP, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.</p>
OAC rule 3745-71-05	See E.2.d below.
OAC rule 3745-114-01 ORC 3704.03(F)	<p>In order to demonstrate compliance with the "Toxic Air Contaminant Statute", the Director has established, per ORC 3704.03(F)(4)(c), a limit for lead, which shall not exceed 1.41 pounds per day. This daily allowable emissions rate was calculated by multiplying the approved daily operating schedule of 24 hours per day submitted in the permit application, by the modeled emission rate of 0.0587 pound per hour (to determine the ground level concentration).</p>

## 2. Additional Terms and Conditions

- 2.a** The emissions limits established pursuant to OAC rule 3745-31-05(A)(3) and from OAC rule 3745-17-10(C)(1), are greater than the potential to emit, as specified in the application, for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emissions limits.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to replacement and/or any modification of equipment, fuels burned, materials processed, pollution control devices, production procedures, etc., or because of the availability of new pertinent emissions data that would increase the potential emissions for any air pollutant.

- 2.b** The permittee shall properly install (or have properly installed), adjust, operate, and maintain a baghouse, cyclone, and associated control equipment, as specified in the application, and any other equipment necessary to capture, contain, and vent

PE to the air pollution control device serving this emissions unit, in accordance with the manufacturer’s recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.

**2.c** The permittee shall properly install (or have properly installed), adjust, operate, and maintain appropriate fuel usage rate monitoring/regulating equipment to ensure that no more than 57 gallons of used oil are burned each hour the emissions unit is in operation.

**2.d** All used oil burned in this emissions unit shall meet the following used oil fuel specifications:

<u>Contaminant/Property</u>	<u>Allowable Specifications</u>
arsenic	59 ppm, by mass, maximum
barium	2142 ppm, by mass, maximum
cadmium	92 ppm, by mass, maximum
chromium	788 ppm, by mass, maximum
lead	13,950 ppm, by mass, maximum
total halogens	4,000 ppm, by mass, maximum*
flash point	100°F, minimum
sulfur content	0.5% by weight, maximum

The used oil burned in this emissions unit shall contain less than the quantifiable levels of PCBs as defined in 40 CFR 761.3; and shall also not exceed the following mercury limitation nor fall below the following heating value:

PCB’s	less than 2 ppm, by mass
heat content	53,000 Btu/gallon, minimum
mercury	1 ppm, by mass, maximum

\* Used oil containing more than 1,000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under paragraph (B)(1) of rule 3745-279-10 of the Administrative Code. The permittee may burn used oil exceeding 1,000 ppm total halogens (but less than 4,000 ppm maximum) only if the permittee has demonstrated that the used oil does not contain any hazardous waste pursuant to OAC rule 3745-279-10(B).

The burning of used oil not meeting the above limitations is prohibited in this emissions unit. The management and burning of used oil is subject to the Standards for the Management of Used Oil, OAC Chapter 3745-279, and the permittee shall document and assure that used oils burned in this emissions unit meet all of the applicable requirements of this Chapter.

- 2.e** This permit shall not exempt the permittee from any applicable regulations regarding the generation, handling, disposal, recycling, transport, and/or burning of used oil.
- 2.f** For waste disposal, the permittee shall comply with any applicable state and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by any operation at this facility.
- 2.g** To ensure the "Toxic Air Contaminant Statute" is satisfied, emissions testing using appropriate US EPA test methods may be required by Ohio EPA to quantify emissions of select individual toxic air contaminants likely to be emitted in excess of 1.0 ton per year and/or to be emitted at levels that could cause a toxic air contaminant ground level concentration to exceed 80% of an applicable MAGLC.

**B. Operational Restrictions**

- 1. The permittee shall burn only the fuel(s) specified by the application in this emissions unit.
- 2. The permittee shall employ the baghouse, cyclone, and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation.
- 3. The permittee shall employ the fuel usage rate monitoring/regulating equipment serving this emissions unit at all times the emissions unit is in operation.
- 4. The amount of used oil burned in this emissions unit shall not exceed 57 gallons per hour. This fuel usage restriction is necessary to limit hourly stack emissions of lead to maintain actual ground level concentrations of lead below the applicable MAGLC, as established per the "Toxic Air Contaminant Statute".
- 5. The permittee shall not burn more than 499,320 gallons of used oil generated on-site in this emissions unit per calendar year. This fuel usage restriction is necessary to limit annual stack emissions below "OHIO MODELING SIGNIFICANT EMISSION RATE" thresholds for criteria pollutants to avoid applicable air dispersion computer modeling requirements.
- 6. All used oil burned in this emissions unit shall be limited to crank case oil, 90 weight gear oil, automatic transmissions fluid, and hydraulic oil.
- 7. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the range of 3 to 8 inches of water, while the emissions unit is in operation.

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

1. For each day during which the permittee burns a fuel other than the type(s) specified by the application and this permit, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall document when the baghouse and/or associated air pollution control equipment serving this emissions unit were/was not in service when the emissions unit was in operation.
3. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
4. The permittee shall document when the fuel usage rate monitoring/regulating equipment serving this emissions unit was not in service when the emissions unit was in operation.
5. The permittee shall properly operate and maintain equipment to monitor/regulate the fuel usage rate of the emissions unit, while the emissions unit is in operation. The monitoring/regulating equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the daily used oil usage rate, in gallons per day, on an daily basis.
6. The permittee shall record and maintain daily the actual hours of operation, in hours per day, and the corresponding average hourly used oil usage rate, in gallons per hour, of the emissions unit.
7. The permittee shall maintain annual records of fuel usage, in gallons per year, of used oil burned in this emissions unit each calendar year.
8. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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 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.

9. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from areas other than the stack 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 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.

10. The permittee shall out-source to an independent testing laboratory quarterly chemical analyses of used oil generated at the facility. Each quarterly chemical analysis shall report the following results on original, dated independent testing laboratory letterhead:
  - a. the date(s) the used oil was generated and sampled at the facility;
  - b. the name, address, and U.S. EPA identification number of the generator;

- c. the following contaminant contents and physical properties demonstrating that the used oil meets the requirements of A.2.d above and applicable standards in OAC Chapter 3745-279 and does not contain quantifiable levels of PCBs:
  - i. arsenic content, in ppm, by mass;
  - ii. barium content, in ppm, by mass;
  - iii. cadmium content, in ppm, by mass;
  - iv. chromium content, in ppm, by mass;
  - v. lead content, in ppm, by mass;
  - vi. mercury content, in ppm, by mass;
  - vii. total halogen content, in ppm, by mass;
  - viii. PCB content, in ppm, by mass;
  - ix. flash point, in °F;
  - x. heat content, in Btu/gallon;
  - xi. sulfur content, in % by weight sulfur;
  - xii. density, in pounds/gallon;
- d. the analysis demonstrating that the used oil has a total halogen content below 1,000 ppm (If the used oil exceeds 1,000 ppm total halogens, the permittee must demonstrate that the used oil does not contain any hazardous waste pursuant to OAC rule 3745-279-10(B).);
- e. the contaminant content results, for each contaminant, shall include the total mass accumulated from dissolved, suspended, and filterable contaminant; and
- f. complete identification and description of the test method(s) employed to determine each used oil contaminant level and physical property listed above.

The concentrations of contaminants (arsenic, barium, cadmium, chromium, lead, mercury, PCBs, and total halogens) in the used oil shall be analyzed using a totals analysis method specified in U.S. EPA publication SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods."

Applicable test methods that should be used follow:

Arsenic, barium, cadmium, chromium, and lead: SW-846, Method 3031 or 3051 (digestion procedures) followed by analysis using Method 6010B or 6020;

Mercury: SW-846, Method 7471A;

PCBs: SW-846, Method 8270C or 8082; and

Total halogens: SW-846, Method 9075, 9076, or 9077.

The permittee shall make a written request to and receive written approval from Ohio EPA Division of Hazardous Waste Management and/or the Division of Air Pollution Control (the appropriate Ohio EPA District Office or local air agency) before alternative applicable test methods, not listed above, are to be employed for total concentration analysis of the above-mentioned used oil contaminants.

Under no circumstances shall the used oil be analyzed using SW-846, Method 1310 (EP-TOX) or SW-846, Method 1311 (TCLP) since these methods determine the degree of mobility of the contaminants in the used oil rather than the total concentration of the contaminants in the used oil. Ohio EPA will not accept results from any inappropriate test methods.

Each analysis of used oil received or generated at this facility shall be kept in a readily accessible location for a period of not less than 5 years and shall be made available to the Ohio EPA Division of Hazardous Waste Management and/or the Division of Air Pollution Control (the appropriate Ohio EPA District Office or local air agency) upon verbal or written request. Any authorized representative of the Ohio EPA may sample or require sampling of any used oil generated, handled, disposed, recycled, transported, and/or burned by/at this facility for periodic detailed chemical analyses, through an independent laboratory.

11. The permit to install for B001 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit application. The Ohio EPA's "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for emissions of lead using the SCREEN 3.0 air dispersion model. The predicted 1-hour maximum ground-level concentration results from SCREEN 3.0 was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
  - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
    - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
    - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure

Indices”; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “X” hours per day and “Y” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\frac{TLV}{10} \times \frac{8}{X} \times \frac{5}{Y} = 4 \frac{TLV}{XY} = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the “worst case” toxic contaminant:

Toxic Contaminant: lead

TLV (mg/m3): 0.05

Maximum Hourly Emission Rate (lbs/hr): 0.0587

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.05

MAGLC (ug/m3): 1.19

The permittee, having demonstrated that emissions of lead, from emissions unit(s) B001, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic contaminant in accordance with ORC 3704.03(F).

12. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration”, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a “modification”, or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit,

described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

13. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
14. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
15. The permittee shall record and maintain daily emissions of lead, in pounds per day, from B001 each day the emissions unit is in operation. Daily lead emissions shall be calculated by multiplying the contaminant level results for lead, in ppm (pounds of lead per million pounds of used oil) by the used oil density, in pounds of used oil per gallon of used oil, of which both of these parameters are from the most current quarterly used oil analysis required by C.10 above, and multiply this result by the daily total number of gallons of used oil burned, gallons per day, recorded each day in C.5 above, and finally multiplying by 0.01, for the assumed baghouse control efficiency of 99%.

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

1. The permittee shall submit deviation (excursion) reports that identify each day, type and quantity of fuel when a fuel other than the type(s) specified by the application and this

permit was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the baghouse and/or associated air pollution control equipment serving this emissions unit were/was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit.
4. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fuel usage monitoring/regulating equipment serving this emissions unit was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
5. The permittee shall submit quarterly fuel usage rate deviation (excursion) reports that identify all periods of time during which the monitored fuel usage rate did not comply with the allowable hourly rate specified above in B.4. These reports are due by the dates described in Part I - General Terms and Condition of this permit under section (A)(2).
6. The permittee shall submit annual reports which identify any exceedances of the annual fuel usage limitation specified above in B.5, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
7. The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to minimize or eliminate any abnormal visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year and shall cover the previous 6-month period.
8. The permittee shall submit semiannual written deviation (excursion) reports that (a) identify all days during which any visible fugitive particulate emissions were observed from any area of this emissions unit other than the stack serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year and shall cover the previous 6-month period.

9. The permittee shall notify the U.S. EPA and the Ohio EPA Division of Hazardous Waste Management and the Division of Air Pollution Control (the appropriate Ohio EPA District Office or local air agency), in writing and within 30 days, of burning any used oil that does not comply with all of the requirements specified in A.2.g above and/or any incident or occurrence of non-compliance with any applicable requirement of OAC Chapter 3745-279 and/or 40 CFR part 761; and shall also notify the Ohio EPA Division of Air Pollution Control, within the same amount of time, if any oil is/was burned which exceeds the mercury limitation of 1 ppm and/or is documented as having a heating value of less than 53,000 Btu/gallon.
10. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the sulfur content limitation specified above. These reports are due by the dates described in Part I - General Terms and Condition of this permit under section (A)(2).
11. The permittee shall submit quarterly deviation reports, to the appropriate Ohio EPA District Office or local air agency, documenting any exceedance of the daily limitation on toxic air emissions or any deviation from a restriction on the process, used oil contaminant level/physical property, fuel usage, or hours of operation, as established by the Director in order to maintain any toxic air contaminant below its MAGLC. The permittee shall also report any changes made, during the calendar quarter, to a parameter or value entered into the dispersion model that demonstrate compliance with the "Toxic Air Contaminant Statute". These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

## **E. Testing Requirements**

1. Compliance with the emission limitations and used oil contaminant levels in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

Stack emissions shall not exceed the following limits when burning used oil:

PE: 1.21 pounds per hour and 5.30 tons per year; and  
lead: 0.0587 pound per hour and 0.257 ton per year.

Applicable Compliance Methods:

The permittee shall demonstrate compliance based upon the results of emissions testing conducted in accordance with the requirements specified below in Section E.2.

- b. Emission Limitations: arsenic, barium cadmium, chromium, lead, mercury, PCBs, and total halogens emissions are limited by the fuel specifications in A.2.d.

Applicable Compliance Method:

Compliance with the emissions for arsenic, barium cadmium, chromium, lead, mercury, PCBs, and total halogens limited by the fuel specifications in A.2.d. shall be demonstrated by the monitoring and record keeping in Section C.10 of this permit.

- c. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

Upon request by the appropriate Ohio EPA District Office or local air agency, compliance shall be determined using Method 9 as set forth in 40 CFR Part 60 Appendix A, as such appendix existed on July 1, 2002 and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- d. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

Upon request by the appropriate Ohio EPA District Office or local air agency, compliance 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, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- e. Emission Limitation:

Stack emissions shall not exceed the following limits when burning used oil:

NO<sub>x</sub>: 1.50 pounds per hour and 6.57 tons per year; and

SO<sub>2</sub>: 4.22 pounds per hour and 18.5 tons per year

Applicable Compliance Methods:

If required, compliance shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 7E for NO<sub>x</sub>, and Method 6 for SO<sub>2</sub>.

2. The permittee shall conduct emissions testing for this emissions unit in accordance with the following requirements:

- a. Emissions testing shall be conducted within 6 months after final issuance of this permit.
- b. Emissions testing shall be conducted to demonstrate compliance with the allowable mass emissions rate(s) in this permit for PE and lead, while burning used oil as specified in this permit, in the appropriate averaging period(s).
- c. Emissions testing shall be conducted to establish emissions rate(s) for arsenic, barium cadmium, chromium, and mercury, while burning used oil as specified in this permit, in the appropriate averaging period(s).
- d. The following test method(s) shall be employed to demonstrate compliance with the applicable allowable mass emissions rate(s):

PE	Method 5	40 <u>CFR</u> Part 60, Appendix A
Lead	Method 12/29	40 <u>CFR</u> Part 60, Appendix A
Arsenic	Method 29	40 <u>CFR</u> Part 60, Appendix A
Barium	Method 29	40 <u>CFR</u> Part 60, Appendix A
Cadmium	Method 29	40 <u>CFR</u> Part 60, Appendix A
Chromium	Method 29	40 <u>CFR</u> Part 60, Appendix A
Mercury	Method 29	40 <u>CFR</u> Part 60, Appendix A.

Alternative US EPA approved test methods may be used with prior approval from Ohio EPA.

- e. The test(s) shall be conducted while this emissions unit is operating at or near its maximum input capacity, based upon the results of the performance testing of E.3 below, while burning used oil specified in the application, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may

result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

#### **F. Miscellaneous Requirements**

- 1. This permit shall replace and supersede all requirements of PTI 16-00529 issued final May 11, 1988.