



State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
TRUMBULL COUNTY

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-13959

DATE: 8/15/2000

Heckett Multiserv
Dewey Dean
PO Box 910
Warren, OH 44482

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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

NEDO



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 02-13959

Application Number: 02-13959
APS Premise Number: 0278000677
Permit Fee: **\$700**
Name of Facility: Heckett Multiserv
Person to Contact: Dewey Dean
Address: PO Box 910
Warren, OH 44482

Location of proposed air contaminant source(s) [emissions unit(s)]:
c/o WCI 1040 Pine Ave
Warren, Ohio

Description of proposed emissions unit(s):
Slag, B-scrap, and mill scale processing plant including material screening, crushing, conveying, and loading.

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



Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

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 are inadequate 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 prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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 Issued: 8/15/2000

Facility ID: 0278000677

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>
particulate matter	10.65 TPY

Emission Unit: F003

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F003 - Slag, B scrap, and mill scale processing plant including material screening, crushing, conveying, and loading	OAC rule 3745-31-05(A)(3)	PE from processing plant operations shall not exceed 2.42 pounds per hour and 10.65 tons per year. Visible fugitive PE from processing plant operations shall not exceed ten percent opacity as a 6-minute average. The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See A.I.2.d, A.I.2.e, and A.I.2.f below.
	OAC rule 3745-17-07(B)(1)	None. See A.I.2.a below.
	OAC rule 3745-17-08(B)(3)	None. See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. The processing plant is not located within the areas identified in "Appendix A" of the rule.
- 2.b Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. The processing plant is not located within the areas identified in "Appendix A" of the rule.

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2.c The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

slag crushing, screening, conveying, and loading; mill scale/B-scrap screening, conveying, and loading

2.d 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:

operations

control measures

slag crushing

wet suppression (material is wetted in dumping stations and then put in a temper pile to absorb more water prior to crushing)

slag and mill scale/B-scrap screening wet suppression (material is wetted in dumping stations and then put in a temper pile to absorb more water prior to screening)

slag and mill scale/B-scrap conveying wet suppression (material is wetted in dumping stations and then put in a temper pile to absorb more water prior to conveying)

slag and mill scale/B-scrap loading wet suppression (material is wetted in dumping stations and then put in a temper pile to absorb more water prior to loading)

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

2.e The above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control 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.

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- 2.f** Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

Emission Unit: F003

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>operations</u>	<u>minimum inspection frequency</u>
slag crushing	daily
slag and mill scale/B-scrap screening	daily
slag and mill scale/B-scrap conveying	daily
slag and mill scale/B-scrap loading	daily

2. The above-mentioned inspections shall be performed during representative, normal operating conditions.

3. The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

4. The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
- c. the dates the control measure(s) was (were) implemented; and
- d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in 4.d shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

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1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency; and
 - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

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

- a. Emission Limitation:

Visible fugitive PE from processing plant operations shall not exceed ten percent opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- b. Emission Limitation:

PE from processing plant operations shall not exceed 2.42 pounds per hour.

Applicable Compliance Method:

To determine the actual hourly emission rate for particulate matter, emission factors outlined in AP-42, Section 11.19, Table 11.19.2-2, 1/95 (Fifth Edition) and Section 12.5, Table 12.5-4, 1/95 (Fifth Edition) shall be used. Emission factors for primary crushing from Table 11.19.2-2 shall be used for crushing operations. Emission factors for conveyor transfer point from Table 11.19.2-2 shall be used for conveying operations. Emission factors for screening from Table 11.19.2-2 shall be used for screening operations. All

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emissions factors used from Table 11.19.2-2 are based upon the use of wet suppression as control. Emission factors for pile formation (lump ore) from Table 12.5-4 shall be used for loading (conveyor to stock and screen to stock) operations.

c. Emission Limitation:

PE from processing plant operations shall not exceed 10.65 tons per year.

Applicable Compliance Method:

Compliance shall be based on 8760 hours of operation and emission factors outlined in AP-42; Section 11.19, Table 11.19.2-2, 1/95 (Fifth Edition) and Section 12.5, Table 12.5-4, 1/95 (Fifth Edition). Emission factors for primary crushing from Table 11.19.2-2 shall be used for crushing operations. Emission factors for conveyor transfer point from Table 11.19.2-2 shall be used for conveying operations. Emission factors for screening from Table 11.19.2-2 shall be used for screening operations. All emissions factors used from Table 11.19.2-2 are based upon the use of wet suppression as control. Emission factors for pile formation (lump ore) from Table 12.5-4 shall be used for loading (conveyor to stock and screen to stock) operations.

F. Miscellaneous Requirements

1. The emission limitations for emissions unit F003 in this permit to install (PTI) shall replace emission limitations for emissions unit F003 in PTI 02-5657 and PTI 02-8425

Emission Unit: F003

NEW SOURCE REVIEW FORM B

PTI Number: 02-13959 Facility ID: 0278000677

FACILITY NAME Heckett Multiserv

FACILITY DESCRIPTION Processing plant including slag crushing, screening, conveying, and loading; and mill scale/B scrap screening, conveying, and loading CITY/TWP Howland

SIC CODE 3295 SCC CODE 3-03-009-24 EMISSIONS UNIT ID F003

EMISSIONS UNIT DESCRIPTION Processing plant including slag crushing, screening, conveying, and loading; and mill scale/B scrap screening, conveying, and loading

DATE INSTALLED 8/2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.88 lbs/hr	0.42 TPY	2.42 lbs/hr	10.65 TPY
PM ₁₀					
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?

Enter Determination Use of a wet suppression system for fugitive PE and compliance with hourly and annual PE limitations.

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:

Emission Unit: F003

NEW SOURCE REVIEW FORM B

PTI Number: 02-13959 Facility ID: 0278000677

FACILITY NAME Heckett Multiserv

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

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

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

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

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

[NSR Discussion](#)

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or Netting Determination
Permit To Install ENTER PTI NUMBER HERE

- A. Source Description
- B. Facility Emissions and Attainment Status
- C. Source Emissions
- D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

PTI 02-13959 for emissions unit F003, slag processing plant, is a modification of PTI 02-8425. The modification incorporates new conveyers, a new screening area, and a new loading station for mill scale and B scrap. This permit will entirely replace PTI 02-8425. Source not subject to NSPS OOO because slag is not a non-metallic

Emission Unit: F003

NEW SOURCE REVIEW FORM B

PTI Number: 02-13959 Facility ID: 0278000677

FACILITY NAME Heckett Multiserv

FACILITY DESCRIPTION	Processing plant including slag crushing, screening, conveying, and loading; and mill scale/B scrap screening, conveying, and loading	CITY/TWP	Howland
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mineral.

Please complete:

SUMMARY (for informational purposes only)**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**PollutantTons Per Year

particulate matter

10.65 TPY