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: 02-19631

DATE: 7/8/2004

Harsco Corp.
Mark Mummert
350 Poplar Church Rd.
Camp Hill, PA 170118888

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **NEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 7/8/2004**
Terms and Conditions	**Effective Date: 7/8/2004**

FINAL PERMIT TO INSTALL 02-19631

Application Number:	02-19631
APS Premise Number:	0278060678
Permit Fee:	**$1250**
Name of Facility:	Harsco Corp.
Person to Contact:	Mark Mummert
Address:	350 Poplar Church Rd. Camp Hill, PA 170118888

Location of proposed air contaminant source(s) [emissions unit(s)]:
412 McKees Lane
Niles, **Ohio**

Description of proposed emissions unit(s):
Rotary slag dryer.

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

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 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

Pollutant	Tons Per Year
Particulate Emissions(PE)	18.8
Nitrogen Oxides(NOx)	5.0
Carbon Monoxide(CO)	4.3
Volatile Organic Compounds(VOC)	0.3

Emissions Unit ID: **P001**

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P001 - Slag Dryer Rotary Dryer(replacement) with wet scrubber	OAC rule 3745-31-05(A)(3)	PE: 0.02 grain per dry standard cubic feet of exhaust gases, 4.3 pounds per hour and 18.8 tons per year. NOx: 1.15 pounds per hour and 5.0 tons/year. CO: 0.97 pounds per hour and 4.3 tons/year. VOC: 0.06 pounds per hour and 0.3 ton/year.
	OAC rule 3745-17-07(A)(1)	Except as specified by rule, visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed twenty (20) percent opacity, as a six-minute average.
	OAC rule 3745-17-11(A)	The emission limitations specified by this rule are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 60, Subpart UUU	The emission limitations specified by this rule are less stringent than the

emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
see C., D., and E.2.

2. Additional Terms and Conditions

2.a None

B. Operational Restrictions

1. The pressure drop across the scrubber shall be maintained within 90 percent of the average value recorded during the most recent performance test that demonstrated compliance with the PE standard specified above.

2. The scrubber liquid flow rate shall be maintained within 20 percent of the average value recorded during the most recent performance test that demonstrated compliance with the PE standard specified above.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall install, calibrate, maintain, and properly operate monitoring devices that continuously measure and record the scrubber liquid flow rate and pressure drop across the scrubber while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The pressure drop device must be certified by the manufacturer to be accurate within five percent of water column gauge pressure at the level of operation. The liquid flow rate monitoring device must be certified by the manufacturer to be accurate within five percent of design scrubbing liquid flow rate.

2. The permittee shall determine and record once each day, from the monitoring devices, an arithmetic average over a 2-hour period of both the change in pressure of the gas stream across the scrubber and the flow rate of the scrubbing liquid.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports of each day during which the pressure drop determined in C.2. is less than 90 percent of the average value recorded during the most recent performance test that demonstrated compliance with the PE standard specified above.

2. The permittee shall submit deviation (excursion) reports of each daily scrubber liquid flow rate recorded in C.2. that is less than 80 percent or greater than 120 percent of the average value

recorded during the most recent performance test that demonstrated compliance with the PE standard specified above.

E. Testing Requirements

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

   a. Emission Limitation : 1.15 lb/hr and 5.0 tons/yr NOx

   Applicable Compliance Method:
   Hourly compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4, Table 1.4-1 (1998) for Natural Gas Combustion and the maximum rating of the burner.

   E(NOx) = 12 mmBtu/hr x scf/1040 Btu x 100 lb NOx/10 E6 scf (AP-42 emission factor) = 1.15 lb/hr

   Annual emissions are determined by multiplying the emission factor by 8760 hr/yr and dividing by 2000 lb/ton.

   If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the hourly NOx emission limit of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 7 or 7E.

   b. Emission Limitation: 0.97 lb/hr and 4.3 tons/yr CO

   Applicable Compliance Method:
   Hourly compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4, Table 1.4-1 (1998) for Natural Gas Combustion and the maximum rating of the burner.

   E(CO) = 12 mmBtu/hr x scf/1040 Btu x 84 lb CO/10 E6 scf (AP-42 emission factor) = 0.97 lb/hr

   Annual emissions are determined by multiplying the emission factor by 8760 hr/yrand dividing by 2000 lb/ton.

   c. Emission Limitation: 0.06 lb/hr and 0.3 ton/yr VOC

   Applicable Compliance Method:

Hourly compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4, Table 1.4-1 (1998) for Natural Gas Combustion and the maximum rating of the burner.

E(VOC) = 12 mmBtu/hr x scf/1040 Btu x 5.5 lb VOC/10 E6 scf (AP-42 emission factor) = 0.06 lb/hr

Annual emissions are determined by multiplying the emission factor by 8760 hr/yr and dividing by 2000 lb/ton.

d. Emission Limitation: 4.3 lbs/hr PE and 0.02 grain per dry standard cubic feet of exhaust gases

Applicable Compliance Method: Compliance shall be based upon OAC rule 3745-17-03(B)(10).

e. Emission Limitation: 18.8 tons/year PE

Applicable Compliance Method: To determine the maximum annual emission rate for particulate matter, the following equation shall be used:

E(PE) = ER x 8760hr/yr / 2000 lb/ton , where

E(PE) is the maximum annual emission rate of particulate emissions

ER is the hourly mass emission rate for particulate emissions as determined in section A.V.2

f. Emission Limitation: 20% opacity, as a 6 minute average .

Applicable Compliance Method: Compliance with the visible emission limitation for the fugitive particulate emissions shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3) and (B)(3)(b) of OAC rule 3745-17-03.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months after completion of construction;

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate matter .

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulate matter, Method 5 of 40 CFR Part 60, Appendix A, sampling time and volume of each test shall be as specified in CFR Part 60.736(b)(1).

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

e. During the initial performance test, the permittee shall use the monitoring devices of C.1.above to determine the average change in pressure of the gas stream across the scrubber and the average flow rate of the scrubber liquid during each of the particulate matter runs. The arithmetic averages of the three runs shall be used as baseline average values for the purpose of D.1 and D.2 above.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Northeast District Offices refusal to accept the results of the emission test(s).

g. Personnel from the Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

F. Miscellaneous Requirements

None