



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149



Re: Permit to Install
Stark County

CERTIFIED MAIL

Richard F. Celeste
Governor

~~June 21, 1989~~

EDWARD C. LEVY CO.
JIM WEBER
9300 DIX AVE.
DEARBORN, MI 48120

15-413

Dear Sir:

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review 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 with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Law Division of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

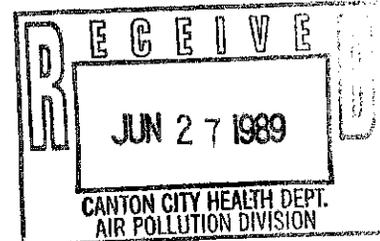
Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

TGR/gs

cc: US EPA
Canton Division of Air Pollution Control



Permit to Install Terms and Conditions

Application No. 15-413
APS Premise No. 1576001521
Permit Fee: \$1400.

Name of Facility: EDWARD C. LEVY CO

Person to Contact: JIM WEBER

Address: 9300 DIX AVE
DEARBORN, MI 48120

Location of proposed source(s): 3715 WHIPPLE AVE SW
PERRY TWP, OHIO

Description of proposed source(s): MODIFICATION OF EXISTING SLAG
PROCESSING PLANT BY INCREASING
PRODUCTION FROM 60000 T/Y TO
120000 T/Y.

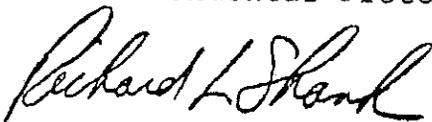
Date of Issuance: JUNE 21, 1989

Effective Date: JUNE 21, 1989

The above named entity is hereby granted a permit to install for the above described source(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 source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source(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

Substantial construction for installation must take place within eighteen months of the effective date of this permit. This deadline may be extended by up to twelve 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.

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, examining records or reports pertaining to the construction, modification or installation of the above described source of environmental pollutants.

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.

The specified permit fee must be remitted within 15 days of the effective date of this permit to install.

If the construction of the proposed source has already begun or has been completed prior to the date the Director of the Ohio 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.

EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for Edward C. Levy Co. located in Stark County. The sources listed below shall not exceed the emission limits/control requirements contained in the following table:

<u>Ohio EPA Source No.</u>	<u>Source Identification</u>	<u>BAT Determination</u>	<u>Applicable Ohio EPA rule</u>	<u>Allowable Emissions (lb/hr, lb/MMBTU, gr/DSCF, etc.)</u>
F002	Material handling & slag processing plant	See T&C nos. 1-5 for specific control measures	3745-31 3745-35 3745-17-08 3745-15-07	N/A
F001	Plant roadways & parking lots	Same as above	Same as above	N/A
F003	Aggregate storage piles	Same as above	Same as above	N/A

SUMMARY
 TOTAL NEW SOURCE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Part.	9.5*

*This is a modification to an existing PTI issued May 30, 1985. This figure is for total emissions. New emissions would be 1/2 of this or 4.75 T/Yr.

This condition in no way limits the applicability of any other state or federal regulation.

APPLICABILITY

This Permit to Install is applicable only to the air contaminant sources listed and does not include the installation or modification of wastewater disposal systems or solid waste disposal facilities. Separate application must be made to the Director for the installation or modification of any such wastewater disposal systems or solid waste disposal facilities.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. All vehicles which deliver slag from the Timken-Harrison Ave. melt shop to the Edward Levy Co. slag plant for processing will pass the vehicle through the water station at the Edward Levy plant prior to dumping at the slag dump stations there. The raw unprocessed slag will pass through the water station shed at a rate slow enough to assure that sufficient water from the spray bar therein will be delivered on the fresh slag to minimize or eliminate all fugitive dust from the slag when it is delivered and dumped at the slag dumping station.

2. Aggregate Processing Plant

In accordance with the requirements of paragraph B of OAC 3745-17-08, Edward C. Levy Co. shall apply wet suppression as often as necessary, to eliminate or minimize fugitive dust emissions. Spray equipment shall be installed with the capability of using the wet suppression (chemical) method. The spray nozzles shall be located at the discharge end of the conveyor handling material from the drum magnet to the slag screening. This plant does not include crushing operations with the exception of drop ball crushing of material too large to be accepted by the bar grizzly. Fugitive dust control for drop ball crushing of oversized material shall be with water sprays or other suitable dust suppression chemicals.

The requirements are applicable to the slag processing plant shown in the print attached to the application.

2. Aggregate Storage Piles

In accordance with the requirements of paragraph B of OAC 3745-17-08, Edward C. Levy Co. shall apply water or other suitable dust suppression chemicals, as often as necessary, on all material stock piles to minimize or eliminate visible emissions of fugitive dust.

These requirements are applicable to raw material stock piles and finished product stock piles.

3. Material Handling

In accordance with the requirements of paragraph B of OAC 3745-17-08, Edward C. Levy Co. shall apply water or other suitable dust suppression chemicals, as often as necessary, on all material handling, except molten slag, to minimize or eliminate fugitive dust or maintain sufficient moisture content or chemical dust suppression chemical content, prior to handling, to eliminate visible emissions of fugitive dust. Molten slag, once dumped into a pot dumping station, will be cooled and moistened with water at a rate of approximately 230 gallons per ton of material unloaded prior to any material handling operations.

These requirements are applicable to material transfers from the pot dumping stations to raw material storage piles, the raw material storage pile to processing plant, the processing plant to finished product storage piles, and the finished product storage pile to vendors' trucks.

4. Plant Paved and Unpaved Roadways

In accordance with the requirements of paragraph B of OAC 3745-17-08, Edward C. Levy Co. shall apply asphalt, oil, water or other suitable dust suppressant chemicals, as often as necessary on all dirt and slag surfaced roads. Speed zones shall be established, posted, enforced, and observed by all vehicles operating within the facility. A paved roadway with enough length and width to prevent material from being deposited on public roads shall be installed prior to offering material for sale to the public. The paved road shall be maintained by sweeping and flushing, as often as necessary, to minimize or prevent fugitive emissions from paved roads onto which earth or other materials have been deposited by vehicles. The facility must maintain a truck mounted spray system on a full time basis for the exclusive use of the facility to distribute water or dust suppressant solutions in order to minimize or eliminate visible emissions of fugitive dust.

When waste oil is used for controlling fugitive dust from the unpaved road segments and parking lots, the following restrictions shall be followed:

- a. Edward C. Levy Co. shall certify or possess certification that all waste oil used to control fugitive dust meets the PCB limitations set forth in 40 CFR 761, and that there are no listed hazardous waste or characteristic hazardous waste as set forth in 40 CFR 261.
- b. A record shall be kept for one year of quantity of all oil applied and its certificate of compliance with 40 CFR 761, and 40 CFR 261. This certificate of compliance should include but not be limited to the name of the oil supplier and an analysis of the oil. The analysis shall include a standard PCB test (gas chromatography using electron capture detector, using a column packing of OV-1 or OV-17 and a florisil clean-up) and representative sampling methods, EP toxicity test procedures, and chemical analysis test methods as specified in 40 CFR 261, APP. I, II, & III. This record shall be made available to the Director or his authorized representative for inspection.
- c. Waste oil shall be applied in such a manner as to prevent pollution of waters of the State as required by the Ohio Revised Code, Section 6111.
- d. Waste oil shall be applied only to unpaved road and parking lot surfaces, and only between sunrise and sundown (daylight hours).

- e. Waste oil shall not be applied to a water saturated surface nor to surfaces on days of predicted rainfall.
 - f. Waste oil shall not be applied at an application rate that allows pooling of liquid.
 - g. Waste oil shall not be applied to the same surface more frequently than twice/week.
 - h. The application of waste oil shall not cause runoff from the application surface.
 - i. Waste oil shall not be applied to vegetation near or adjacent to surfaces being treated.
 - j. Waste oil shall not be applied within 12 feet of structures crossing bodies of water or drainage ditches.
 - k. The discharge of waste oil must stop when the applicator vehicle stops.
 - l. The applicator vehicle must be moving at least five (5) MPH at all times while the waste oil is being applied.
 - m. The applicator vehicle discharge valve shall be locked closed between the waste oil collection point and the specific surfaces which have been approved for waste oil application.
 - n. Any valves that provide for tank draining other than through the spreader bar must be locked closed during waste oil application and transport.
 - o. The angle of discharge from the applicator vehicle spreader bar shall not be greater than 60 degrees from the perpendicular to the unpaved surface.
5. Fresh slag transported to Levy shall be adequately wet down to minimize or eliminate fugitive dust emissions during transportation.