



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
RICHLAND COUNTY**

CERTIFIED MAIL

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: 03-13951

DATE: 2/27/2003

Heckett MultiServe
Jerry Henderson
PO BOX 2669
Mansfield, OH 44903

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,

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

cc: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 2/27/2003
Effective Date: 2/27/2003**

FINAL PERMIT TO INSTALL 03-13951

Application Number: 03-13951
APS Premise Number: 0370010148
Permit Fee: **\$700**
Name of Facility: Heckett MultiServe
Person to Contact: Jerry Henderson
Address: PO BOX 2669
Mansfield, OH 44903

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1490 Old Bowman Street
Mansfield, Ohio**

Description of proposed emissions unit(s):
Modification to existing slag processing operations.

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 record keeping 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 record keeping 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.

Heckett MultiServe
 PTI Application: 03-13951
 Issued: 2/27/2003

Facility ID: 0370010148

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 Emissions (PE)	1.04

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 processing operations - Modification to existing operations to install a new slag screening module.	OAC rule 3745-31-05(A)(3)	1.04 tons/yr particulate emissions (PE) Opacity restrictions, See A.2.f.
	OAC rule 3745-17-07(B)	Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.a through A.2.d)
	OAC rule 3745-17-08(B)	See A.2.e. See A.2.e.

2. Additional Terms and Conditions

- 2.a The material handling operations that are covered by this permit and subject to the above mentioned requirements are listed below:

All loading and unloading

All transfer points and crushing

All screening

- 2.b The permittee shall employ best available control measures for the above-identified material handling operations 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 measures to ensure compliance:

<u>material handling operation</u>	<u>control measure(s)</u>
loading and unloading	reduced drop height
transfer points and crushing	wet suppression
screening and primary feeder	water mist system

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

- 2.c For each material handling operation that is not adequately enclosed, the above-identified control measures 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 measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measures is unnecessary.
- 2.d Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- 2.e The emission limitation specified by this rule is equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.f Visible emissions from the material processing equipment shall not exceed the following opacity restrictions:

Emissions Point (Company ID)	Equipment Type	Opacity Limit as a 6-minute average, unless otherwise specified	Regulatory Basis for Limit

Hecke**PTI A****Issued: 2/27/2003**Emissions Unit ID: **F003**

1. unloading slag into primary feeder	material unloading	20% as a 3-minute average	OAC rule 3745-17-07(B)
3. feeder to conveyor	transfer point	10%	OAC rule 3745-31-05
4. conveyor to conveyor	transfer point	10%	OAC rule 3745-31-05
5. conveyor to feeder	transfer point	10%	OAC rule 3745-31-05
6. feeder to conveyor	transfer point	10%	OAC rule 3745-31-05
7. conveyor to conveyor	transfer point	10%	OAC rule 3745-31-05
8. conveyor to screen	transfer point	10%	OAC rule 3745-31-05
9. screen	screen	10%	OAC rule 3745-31-05
10. screen to stock	transfer point	10%	OAC rule 3745-31-05
11. screen to conveyor	transfer point	10%	OAC rule 3745-31-05
11.a. conveyor to crusher	transfer point	10%	OAC rule 3745-31-05
12. crusher	crusher	10%	OAC rule 3745-31-05
13. crusher to conveyor	transfer point	10%	OAC rule 3745-31-05
14. conveyor to conveyor	transfer point	10%	OAC rule 3745-31-05
15. screen to conveyor	crusher	10%	OAC rule 3745-31-05
16. conveyor to stock	transfer point	10%	OAC rule 3745-31-05
18. screen to conveyor	transfer point	10%	OAC rule 3745-31-05
19. conveyor to screen	transfer point	10%	OAC rule 3745-31-05
19.a. screen	screen	10%	OAC rule 3745-31-05
19.b screen to conveyor	transfer point	10%	OAC rule 3745-31-05
19.c conveyor to stock	transfer point	10%	OAC rule 3745-31-05
19.d screen to conveyor	transfer point	10%	OAC rule 3745-31-05
19.e. conveyor to stock	transfer point	10%	OAC rule 3745-31-05
19.f. screen to conveyor	transfer point	10%	OAC rule 3745-31-05
19.g conveyor to stock	transfer point	10%	OAC rule 3745-31-05
19.h. screen to conveyor	transfer point	10%	OAC rule 3745-31-05
19.i conveyor to stock	transfer point	10%	OAC rule 3745-31-05
30. feeder to screen	transfer point	10%	OAC rule 3745-31-05
31. screen	screen	10%	OAC rule 3745-31-05
32. screen to conveyor	transfer point	10%	OAC rule 3745-31-05
33. conveyor to stock	transfer point	10%	OAC rule 3745-31-05
34. screen to stock	transfer point	10%	OAC rule 3745-31-05
35. screen to conveyor	transfer point	10%	OAC rule 3745-31-05
36. conveyor to stock	transfer point	10%	OAC rule 3745-31-05
37. conveyor to screen	transfer point	10%	OAC rule 3745-31-05
38. screen	screen	10%	OAC rule 3745-31-05
39. screen to stock	transfer point	10%	OAC rule 3745-31-05

40.screen to stock	transfer point	10%	OAC rule 3745-31-05
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B. Operational Restrictions

1. The maximum annual material throughput for this emissions unit shall not exceed 150,000 tons. This restriction is based on the material throughput of the primary feeder.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the amount (tons per month and total tons, to date, for the calendar year) of material processed through the feeder of this emissions unit
2. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>Material Handling Operations</u>	<u>Minimum Inspection Frequency</u>
All	Once During Each Day of Operation

3. The above-mentioned inspections shall be performed during representative, normal operating conditions.
4. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, 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.
5. 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 5.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

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 permittee shall submit annual written reports of any deviations (excursions) from the annual throughput limitations in section B.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 1.04 tons/yr fugitive PE

Applicable Compliance Method: The emissions limitation was established using the following equation: Total Emissions = S unloading + crushing + screening + transfer points

The following AP-42 emissions factors (Section 11.19.2 - 1/95) were used: for unloading, 0.00021 lb PE/ton*; for crushing, 0.0042 lb PE/ton*(fines crushing); for screening, 0.00176 lb PE/ton*(crushed stone); and for transfer points, 0.0001008 lb PE/ton*.

* Multiplied PM10 emission factor by 2.1 to determine PE emission factor per AP-42 guidance.

The emissions above represent the maximum values based on an annual material throughput of 150,000 tons for the primary feed. Therefore provided compliance is shown with the annual throughput restriction and the requirement to apply best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust, compliance with the annual PE limitation will be assumed.

Heckett MultiServe
PTI Application: 02 12051
Issued

Facility ID: 0370010148

Emissions Unit ID: **F003**

- b. Emission Limitation: Opacity restrictions, as specified in condition A.2.e.

Applicable Compliance Method: If required, compliance with the visible emission limitations for the fugitive dust operations identified in condition A.2.e. 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)(a) and (B)(3)(b) of OAC rule 3745-17-03.

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 03-13951 Facility ID: 0370010148

FACILITY NAME Heckett MultiServe

FACILITY DESCRIPTION slag processing operations. CITY/TWP Mansfield

SIC CODE 3295 SCC CODE 3-05-999-99 EMISSIONS UNIT ID F003

EMISSIONS UNIT DESCRIPTION Slag crushing, screening, and material handling operations

DATE INSTALLED 4/03

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					1.04
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

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 containinants 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: _____