



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
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: 03-13640

Fac ID: 0370010212

DATE: 8/17/2006

Milliron Recycling, Inc.
Grant Milliron
2384 State Route 39N
Mansfield, OH 44903

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 8/17/2006
Effective Date: 8/17/2006**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-13640

Application Number: 03-13640
Facility ID: 0370010212
Permit Fee: **\$0**
Name of Facility: Milliron Recycling, Inc.
Person to Contact: Grant Milliron
Address: 2384 State Route 39N
Mansfield, OH 44903

Location of proposed air contaminant source(s) [emissions unit(s)]:

**2384 State Route 39N
Mansfield, Ohio**

Description of proposed emissions unit(s):

Administrative modification to PTI 0313640, issued 1/6/04 for emissions unit P901.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Milliron Recycling, Inc.
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Modification Issued: 8/17/2006

Facility ID: 037001021

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

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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)

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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.

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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

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Modification Issued: 8/17/2006

Emissions Unit ID: F001

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	22.98*
Hg	0.013

* Total fugitive PE emissions amount to 17.40 tons/year

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Emissions Unit ID: F001

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>	
		OAC rule 3745-17-07(B)
F001 - Plant Roadways and Parking Areas	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-08(B)
Paved Roadways and Parking Areas	OAC rule 3745-31-05(A)(3)	
Unpaved Roadways and Parking Areas	OAC rule 3745-31-05(A)(3)	

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Emissions Unit ID: **F001**

Applicable Emissions
Limitations/Control Measures

9.33 tons fugitive particulate matter (PE) per year

There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed one minute during any 60-minute observation period

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.c and A.2.e through A.2.h)

There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed three minutes during any 60-minute observation period

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.d through A.2.h)

See A.2.j

See A.2.j

2. Additional Terms and Conditions

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- 2.a** The paved roadways and parking areas that are subject to the terms and conditions of this permit are listed below:

<u>identification:</u>	<u>road segment length:</u>
Parking "A"	0.068 miles
Parking "B"	0.136 miles

- 2.b** The unpaved roadways and parking areas that are subject to the terms and conditions of this permit are listed below:

<u>identification:</u>	<u>road segment length:</u>
Parking "C, D"	0.246 miles

- 2.c** The permittee shall employ best available control measures on all paved roadways and parking areas 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 treat the paved roadways and parking areas by sweeping, flushing and watering, at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.d** The permittee shall employ best available control measures on all unpaved roadways and parking areas 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 treat the unpaved roadways and parking areas with water, at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.f** Any unpaved roadway or parking area, which during the term of this permit is

paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.

- 2.g** The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.h** Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported. It should be noted that this term and condition does not require ALL open-bodied vehicles to be covered, only those which would result in fugitive dust emissions if the materials were not covered.
- 2.i** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05(A)(3).
- 2.j** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:
- | <u>paved roadways and parking areas</u> | <u>minimum inspection frequency</u> |
|---|-------------------------------------|
| Parking "A" | once per day of operation |
| Parking "B" | once per day of operation |
| <u>unpaved roadways and parking areas</u> | <u>minimum inspection frequency</u> |

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occurrences:

- a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented 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.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
9.33 tons fugitive PE/yr

Applicable Compliance Method:

The emission limitation was developed by applying a factor of (1-.95) for 95% control efficiency for use of best available control measures to maximum potential uncontrolled particulate emission rates of 3.52 tons for paved roadways and 182.97 tons for unpaved roadways. The maximum potential uncontrolled emission rate for paved roadways was calculated by multiplying an emission factor of 0.64 lb PE per vehicle mile traveled (VMT) (AP-42, section 13.2.1, 09/1998) and a maximum paved VMT of 11,000 miles. The maximum potential uncontrolled emission rate for unpaved roadways was calculated by multiplying an emission factor of 20.33 lbs PE per vehicle mile traveled (VMT) (AP-42, section 13.2.2, 09/1998) and a maximum unpaved VMT of 18,000 miles. Therefore, provided compliance is shown with the requirements of this permit to apply best available control measures, compliance with the ton per year PE limitation will be assumed.

- b. Emission Limitation:
There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed one minute during any 60-minute observation period

Applicable Compliance Method:

If required, compliance with the emissions limitation for the paved roadways and parking areas identified above shall be determined in accordance with Test Method 22 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)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

- c. Emission Limitation:
There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed three minutes during any 60-minute observation period

Applicable Compliance Method:

If required, compliance with the emissions limitation for the unpaved roadways and parking areas identified above shall be determined in accordance with Test

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Method 22 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)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

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F. Miscellaneous Requirements

None

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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>	OAC rule 3745-17-08(B)
P901 - 105 ton/hr hammermill (Shredder). Administrative modification to PTI #03-13640, issued 1/6/04, to update reporting requirement D.1.	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-07(B)	

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Applicable Emissions
Limitations/Control Measures

Control requirements (See
A.2.a)

Opacity restrictions (See
A.2.b)

0.013 tons mercury (Hg)/yr

Fugitive emissions:

8.07 tons PE/yr

Best available control
measures that are sufficient to
minimize or eliminate visible
emissions of fugitive dust.
(see sections A.2.a through
A.2.e)

Cyclone splitter vent stack
emissions:

4.29 lbs PE/hr; 5.58 tons PE/yr

See A.2.g

See A.2.h

See A.2.h

2. Additional Terms and Conditions

2.a Best Available Technology (BAT) for this emission unit has been determined to be use of a cyclone with a maximum outlet concentration of 0.02 gr/dscf, use of hinge covers for material handling, and water injection for the hammermill.

2.b Visible particulate emissions shall not exceed the following:
i. 20% opacity, as a three-minute average for fugitive emissions from the shredding operation;
ii. 5% opacity, as a six-minute average from cyclone splitter vent stack and from the material handling/storage operations associated with the shredding line.

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

Material Handling (Belt Conveyor Transfer Systems) of Shredded Material
Truck Loading of Shredded Material
Storage Piles

2.d The permittee shall employ best available control measures for the above-identified material handling/storage 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:

<u>material handling/storage operations</u>	<u>control measures</u>
Material Handling (Belt Conveyor Transfer Systems) of Shredded Material	watering
Truck Loading of Shredded Material content*	maintain moisture
Storage Piles	maintain moisture content*

*If a moisture content cannot be maintained which is sufficient enough to ensure compliance with the above-mentioned applicable requirements, the permittee shall apply additional control measures for the purpose of ensuring compliance with the above-mentioned applicable requirements.

- 2.e** For each material handling/storage operation, 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/storage operations until further observation confirms that use of the control measure is unnecessary.
- 2.f** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05(A)(3).
- 2.g** The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.h** The requirements established pursuant to this rule are equivalent or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

- 1. The permittee shall only process vehicles through the hammermill which meet the following requirements:

 - a. readily accessible mercury-containing devices located in the trunk and hood of the vehicle have been removed; and
 - b. all gas tanks, gasoline, and batteries have been removed; and
 - c. readily removable fluids (motor oil, transmission oil, and antifreeze)
- 2. The permittee shall not process any materials (including vehicles) through the hammermill which contain Freon or other CFCs/HCFCs.
- 3. The permittee shall not process any materials (except as provided in B.1. above for vehicles) through the hammermill which contain oil or other liquid material other than water.
- 4. The maximum annual operating hours for this emissions unit shall not exceed 2,600 per year.

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5. The stack on this emissions unit shall be constructed such that it meets the minimum requirements necessary to perform Methods 1-4, of 40 CFR Part 60, Appendix A.

C. Monitoring and/or Recordkeeping Requirements

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

Millirc**PTI A****Modification Issued: 8/17/2006**Emissions Unit ID: **P901**material handling operationsfrequencyminimum inspectionMaterial Handling (Belt Conveyor Transfer Systems)
of Shredded Material

each day of operation

Truck Loading of Shredded Material
Storage Piles

each day of operation

each day of operation

2. The purpose of the inspections is to determine the need for implementing control measures for the material handling/storage operations. The inspections shall be performed during representative, normal material handling/storage operations associated with the shredding line.
3. The permittee may, upon receipt of written approval from the Ohio EPA, Northwest 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 measures;
 - c. the dates the control measure was 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/storage operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

5. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the cyclone splitter vent 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 eliminate the visible emissions.
6. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the shredding operation serving this emissions unit. The presence or absence of any visible fugitive 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 location and 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 weekly 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.

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Emissions Unit ID: P901

7. The permittee shall maintain monthly records of the hours of operation (hours per month and total hours to date from January to December) for this emissions unit.
8. The permittee shall document and/or require any supplier of material to document the following for each load of material received for shredding:
 - a. Freon or other CFCs/HCFCs have been removed in accordance with the applicable provisions of 40 CFR Part 82 - Protection of Stratospheric Ozone;
 - b. Oil, or other liquid material other than water have been removed (except for vehicles as provided in C.8.d.);
 - c. documentation from suppliers of the known amount of mercury-containing devices in the scrap (scrap being defined as any vehicle or non-vehicle related material);
 - d. for vehicles received the permittee shall document that:
 - i. readily accessible mercury-containing devices located in the trunk and hood of the vehicle have been removed. The permittee shall also document when mercury-containing devices were not accessible and the reason the devices were not accessible;
 - ii. gas tanks, gasoline, and batteries have been removed. The permittee shall also document all instances when any gas tanks, gasoline, and/or batteries have not been removed.
 - iii. readily removable fluids (motor oil, transmission oil, and antifreeze) have been removed.
9. The Permit to Install for this emissions unit P901 was evaluated based on the mercury emissions from the volume source, the shredder, and the design parameters of the shredder opening, as specified by the permittee and the manufacturer in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for mercury emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Pollutant: Mercury

TLV (ug/m3): 25

Maximum Hourly Emission Rate (lbs/hr): 0.0102405

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.985

MAGLC (ug/m3): 2

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- b. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in opening height, changes in diameter of opening, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (new pollutants emitted, change in exhaust parameters, etc.);

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- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that identify each instance when the documentation required in Section C.8 was not maintained for each load of material received for shredding. These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
2. 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;
 - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented;
 - c. each instance that gas tanks, gasoline, and/or batteries were not removed from vehicles as required in B.1.b.; and
 - d. each instance that Freon or CFCs/HCFCs have not been removed from any materials (including vehicles) as required in B.2. of this permit.
3. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the annual operating hours limitation, as well as the corrective actions taken to achieve compliance. The reports shall be submitted by January 31 of each year and shall cover the previous 12-month period. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no

deviations occurred during that year.

5. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the cyclone splitter vent stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions and/or visible fugitive particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
6. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the shredding operation serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. 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 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit.
 - b. The emission testing shall be conducted on the cyclone exhaust to demonstrate compliance with the lbs/hr limitation of PE. Emission testing shall also be conducted on the exhaust to demonstrate no mercury emissions exist.
 - c. The following test method(s) shall be employed to demonstrate compliance with the above emissions limitations: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for Hg, Methods 1-4 and 29 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The tests shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall

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submit an "Intent to Test" notification to the Ohio EPA, Northwest 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, Northwest District Office refusal to accept the results of the emission test(s).

- f. Personnel from the Ohio EPA, Northwest 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.
 - g. 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, Northwest 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, Northwest District Office.
2. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
4.29 lbs PE/hr from the cyclone splitter vent stack
5.58 tons PE/yr from the cyclone splitter vent stack

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission rate through stack testing using methods and procedures as specified in 40 CFR Part 60, Appendix A, Methods 1-5 on the cyclone exhaust. The tons per year limitation was developed by multiplying the pounds per hour limitation by an operating restriction of 2600 hours/year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation and the hours of operation restriction, compliance will also be shown with the annual limitation.

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- b. Emission Limitation:
8.07 tons fugitive PE/yr

Applicable Compliance Method:

The emission limitation was established by multiplying an emission factor of 0.05 pounds PE per 1000 pounds of metal shredded (USEPA Speciate 3.0 program, 10/1999), a maximum shredding rate of 210,000 pounds per hour, a maximum operating schedule of 2,600 hours per year, and a conversion factor of 1 ton per 2000 lbs and then subtracting 5.58 tons PE/yr for emission exhausted from the cyclone. Therefore, provided compliance is shown with the annual operating hours restriction of 2600, compliance with the ton per year fugitive PE limitation for this emissions unit will be assumed.

- c. Emission Limitation:
0.013 tons Hg/year

Applicable Compliance Method:

The annual limitation is based on an emission rate of 0.01 lbs Hg per hour* which was derived from the Maximum Allowable Ground Level Concentration (MAGLC) for mercury as determined by Ohio EPA's Air Toxics Policy. The annual emission limitation is based on the hourly emission rate being multiplied by a maximum annual operating schedule of 2600 hours, and divided by a conversion factor of 1 tons per 2000 pounds. Therefore, provided compliance is shown with the annual operating hours restriction of 2600 and with the requirements of this permit to remove mercury-containing devices (See section B.1), compliance with the ton per year Hg limitation for this emissions unit will be assumed.

* The emission rate of 0.01 lbs Hg per hour represents 58 mercury switches per 100 automobiles at 1 gram Hg per switch with 10% of the total mercury being emitted from the shredder.

- d. Emission Limitation:
Visible fugitive PE from the shredding operation shall not exceed 20% opacity, as a three-minute average

Applicable compliance method:

If required, compliance shall be demonstrated using test method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance

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for New Stationary Sources" as such appendix existed on July 1, 1996, with the modifications in paragraphs (a) and (b) of OAC rule 3745-17-03 (B)(3). with U.S. EPA Method 9 of 40 CFR, Part 60, Appendix A.

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- e. Emission Limitation:
Visible particulate emissions from the cyclone splitter vent stack and visible fugitive PE from the material handling/storage operations associated with the shredding line shall not exceed 5% opacity, as a six-minute average
- Applicable compliance method:
If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

F. Miscellaneous Requirements

None