



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
RICHLAND 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: 03-13959

DATE: 6/3/2003

PSC Metals, Inc.
Steve Forystek
20521 Chagrin Boulevard
Cleveland, OH 44122

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: 6/3/2003
Effective Date: 6/3/2003**

FINAL PERMIT TO INSTALL 03-13959

Application Number: 03-13959
APS Premise Number: 0370010294
Permit Fee: **\$800**
Name of Facility: PSC Metals, Inc.
Person to Contact: Steve Forystek
Address: 20521 Chagrin Boulevard
Cleveland, OH 44122

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1344 Bowman Street
Mansfield, Ohio**

Description of proposed emissions unit(s):
Modification of Lime Handling System and addition of storage piles and loading cells.

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

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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.

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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)	24.74

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
F002 - storage piles	OAC rule 3745-31-05(A)(3)	3.20 TPY fugitive particulate emissions (PE)
load-in and load-out of storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05(A)(3)	See A.2.f.
	OAC rule 3745-17-07(B)(6)	No visible particulate emissions except for a period of time not to exceed 13-minutes during any 60-minute observation period.
	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.b. through A.2.d.)
wind erosion from storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05(A)(3)	See A.2.f.
	OAC rule 3745-17-07(B)(6)	No visible particulate emissions except for a period of time not to exceed 13-minutes during any 60-minute observation period.
	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.b. through A.2.d.)

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Issued: 6/3/2003

Emissions Unit ID: **F002**

2. Additional Terms and Conditions

- 2.a The storage piles that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are 10-16 storage piles consisting of scrap metal products.
- 2.b The permittee shall employ reasonably available control measures on all load-in and load-out operations associated with the storage piles and for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee maintains that the storage piles contain materials that have inherent characteristics that result in an amount of fugitive particulate emissions which comply with all applicable requirements without applying control. If at any time fugitive particulate emissions generated do not meet the above applicable requirements, the permittee shall employ reasonably available control measures to ensure compliance.
- 2.c Reasonably available control measures shall be employed 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 any such operation until further observation confirms that use of the measures is unnecessary.
- 2.d Implementation of the control measures for wind erosion from the surface of a storage pile shall not be necessary for a storage pile 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.
- 2.e Compliance with terms and conditions A.I.2.b. and A.I.2.c. of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.
- 2.f The requirements of this rule also include compliance the requirements of OAC rule 3745-17-07(B)(6) and OAC rule 3745-17-08(B).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

Emissions Unit ID: **F002**

1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in and load-out operation at each storage pile and inspections from wind erosion from pile surfaces at each storage pile in accordance with the following frequencies:

Storage Pile Identification

All Storage Piles

Minimum Load-In Inspection Frequency

Weekly

2. Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

Storage Pile identification

All Storage Piles

Minimum Load-Out Inspection Frequency

Weekly

3. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

Storage Pile Identification

All Storage Piles

Minimum Wind Erosion Inspection Frequency

Weekly

4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
5. The purpose of the inspections is to determine the need for implementing control measures for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
6. 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, including those

inspections that were not performed due to snow and/or ice cover or precipitation;

- 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 measures were implemented; and,
- d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. any periods during which inspection(s) were 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: 3.20 TPY fugitive PE

Applicable Compliance Method: The emission limitation was established by combining the emissions from load-in and load-out operations and from wind erosion from each storage pile as listed in PTI application #03-13959. The emission rate was determined as follows:

- i. Load-in - emissions associated with load-in operations were established by multiplying the maximum load-in rate of 1,400,000 tons of product per year by the appropriate emission factor from AP-42 section 13.2.4.3 (1/95) [varies based on

moisture content, see application], and dividing by 2000 lbs/ton. (2.06 tons fugitive PE/yr)

- ii. Load-out - emissions associated with load-out operations were established by multiplying the maximum load-out rate of 530,000 tons of product per year (balance of materials is accounted for in load charging cells), by the appropriate emission factor from AP-42 section 13.2.4.3 (1/95) [varies based on moisture content, see application], and dividing by 2000 lbs/ton. (0.96 ton fugitive PE/yr)
- iii. Wind erosion - emissions were established by multiplying a maximum combined storage pile surface area of 0.64 acre for product, the appropriate emission factor from AP-42 section 13.2.4.3 (1/95) [1.55 lb PE/day/acre], multiplied by 365 days and dividing by 2000 lbs/ton. (0.18 ton fugitive PE/yr)

Therefore, provided compliance is shown with the requirements of this permit to apply reasonably available control measures, compliance with the ton per year PE limitation will be assumed.

- b. Emission Limitation: No visible particulate emissions except for a period of time not to exceed 13-minutes during any 60-minute observation period

Applicable Compliance Method: If required, the permittee shall demonstrate compliance pursuant to the method and procedures specified in OAC rule 3745-17-03(B)(4).

F. Miscellaneous Requirements

None

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 - Material Loading of Charging Cell #1	OAC rule 3745-31-05(A)(3)	7.18 TPY fugitive particulate emissions (PE) See A.2.e.
	OAC rule 3745-17-07(B)(1)	visible particulate emission limitations shall not exceed 20% Opacity as a 3-minute average
	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.b. and A.2.c.)

2. Additional Terms and Conditions

- 2.a The material handling operations that are covered by this permit and subject to the requirements of OAC rule 3745-17-07(B)(1) and OAC rule 3745-17-08(B) are loading of steel and ferro alloy materials into a charging bucket and charge pot via an alloy handling system and crane.
- 2.b The permittee shall employ reasonably available control measures on all loading of steel and ferro alloy materials into a charging bucket and charge pot via an alloy handling system and crane for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee maintains that the materials that have inherent characteristics that result in an amount of

fugitive particulate emissions which comply with all applicable requirements without applying control. If at any time fugitive particulate emissions generated do not meet the above applicable requirements, the permittee shall employ reasonably available control measures to ensure compliance.

- 2.c Reasonably available control measures shall be employed 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 any such operation until further observation confirms that use of the measures is unnecessary.
- 2.d Compliance with terms and conditions A.I.2.b. and A.I.2.c. of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.
- 2.e The requirements of this rule also include compliance the requirements of OAC rule 3745-17-07(B)(6) and OAC rule 3745-17-08(B).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

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

<u>Material Handling Identification</u>	<u>Minimum Inspection Frequency</u>
load-out system to charge pot	weekly
transfer system to charge bucket	weekly

- 2. The purpose of the inspections is to determine the need for implementing control measures for material handling operations. The inspections shall be performed during representative, normal material handling operating conditions.
- 3. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to precipitation;

- 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 measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. any periods during which inspection(s) were not performed by the required frequency, excluding an inspection which was not performed due to 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: 7.18 TPY fugitive PE

Applicable Compliance Method: The emission limitation was established by combining the emissions from all load-out operations as listed in PTI application #03-13959. The emission rate was determined as follows:

- i. load-out to charge pot- emissions associated with these load-out operations were established by multiplying the load-out rates of (varies, see application, 830,000 tons of product per year total) by the appropriate emission factor from AP-42 section 13.2.4.3 (1/95) [varies based on moisture content, see application], and dividing by 2000 lbs/ton. (1.78 tons fugitive PE/yr)
- ii. transfer to charge bucket - emissions associated with load-out operations were established by multiplying the maximum load-out rate of 860,000 tons of product per year, by the appropriate emission factor from AP-42 section 13.2.4.3 (1/95) [0.026 lb PE/ton of product], multiplied by 0.5 (as 50% of the material handled accounts for these emissions) as and dividing by 2000 lbs/ton. (5.40 tons fugitive PE/yr).

Therefore, provided compliance is shown with the requirements of this permit to apply reasonably available control measures, compliance with the ton per year PE limitation will

be assumed.

- b. Emission Limitation: visible particulate emission limitations shall not exceed 20% opacity, as a 3-minute average

Applicable Compliance Method:

Compliance with the visible emission limitation for the material handling operation(s) identified above 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

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>
F004 - Material Loading of Charging Cell #2	OAC rule 3745-31-05(A)(3)	7.18 TPY fugitive particulate emissions (PE) See A.2.e.
	OAC rule 3745-17-07(B)(1)	visible particulate emission limitations shall not exceed 20% Opacity as a 3-minute average
	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.b. and A.2.c.)

2. Additional Terms and Conditions

- 2.a The material handling operations that are covered by this permit and subject to the requirements of OAC rule 3745-17-07(B)(1) and OAC rule 3745-17-08(B) are loading of steel and ferro alloy materials into a charging bucket and charge pot via an alloy handling system and crane.
- 2.b The permittee shall employ reasonably available control measures on all loading of steel and ferro alloy materials into a charging bucket and charge pot via an alloy handling system and crane for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee

Emissions Unit ID: **F004**

maintains that the materials that have inherent characteristics that result in an amount of fugitive particulate emissions which comply with all applicable requirements without applying control. If at any time fugitive particulate emissions generated do not meet the above applicable requirements, the permittee shall employ reasonably available control measures to ensure compliance.

- 2.c** Reasonably available control measures shall be employed 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 any such operation until further observation confirms that use of the measures is unnecessary.
- 2.d** Compliance with terms and conditions A.I.2.b. and A.I.2.c. of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.
- 2.e** The requirements of this rule also include compliance the requirements of OAC rule 3745-17-07(B)(6) and OAC rule 3745-17-08(B).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

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

<u>Material Handling Identification</u>	<u>Minimum Inspection Frequency</u>
load-out system to charge pot	weekly
transfer system to charge bucket	weekly

2. The purpose of the inspections is to determine the need for implementing control measures for material handling operations. The inspections shall be performed during representative, normal material handling operating conditions.
3. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to precipitation;

- 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 measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. any periods during which inspection(s) were not performed by the required frequency, excluding an inspection which was not performed due to 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: 7.18 TPY fugitive PE

Applicable Compliance Method: The emission limitation was established by combining the emissions from all load-out operations as listed in PTI application #03-13959. The emission rate was determined as follows:

- i. load-out to charge pot- emissions associated with these load-out operations were established by multiplying the load-out rates of (varies, see application, 830,000 tons of product per year total) by the appropriate emission factor from AP-42 section 13.2.4.3 (1/95) [varies based on moisture content, see application], and dividing by 2000 lbs/ton. (1.78 tons fugitive PE/yr)
- ii. transfer to charge bucket - emissions associated with load-out operations were established by multiplying the maximum load-out rate of 860,000 tons of product per year, by the appropriate emission factor from AP-42 section 13.2.4.3 (1/95) [0.026 lb PE/ton of product], multiplied by 0.5 (as 50% of the material handled accounts for these emissions) as and dividing by 2000 lbs/ton. (5.40 tons fugitive PE/yr).

Therefore, provided compliance is shown with the requirements of this permit to apply reasonably available control measures, compliance with the ton per year PE

PSC Metals, Inc.
PTI Application: 02 12050
Issued

Facility ID: 0370010294

Emissions Unit ID: F004

limitation will be assumed.

- b. Emission Limitation: visible particulate emission limitations shall not exceed 20% opacity, as a 3-minute average

Applicable Compliance Method:

Compliance with the visible emission limitation for the material handling operation(s) identified above 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

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>
F005 - Material Loading of Charging Cell #	OAC rule 3745-31-05(A)(3)	7.18 TPY fugitive particulate emissions (PE) See A.2.e.
	OAC rule 3745-17-07(B)(1)	visible particulate emission limitations shall not exceed 20% Opacity as a 3-minute average
	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see A.2.b. and A.2.c.)

2. Additional Terms and Conditions

- 2.a The material handling operations that are covered by this permit and subject to the requirements of OAC rule 3745-17-07(B)(1) and OAC rule 3745-17-08(B) are loading of steel and ferro alloy materials into a charging bucket and charge pot via an alloy handling system and crane.
- 2.b The permittee shall employ reasonably available control measures on all loading of steel and ferro alloy materials into a charging bucket and charge pot via an alloy handling system and crane for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee

maintains that the materials that have inherent characteristics that result in an amount of fugitive particulate emissions which comply with all applicable requirements without applying control. If at any time fugitive particulate emissions generated do not meet the above applicable requirements, the permittee shall employ reasonably available control measures to ensure compliance.

- 2.c** Reasonably available control measures shall be employed 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 any such operation until further observation confirms that use of the measures is unnecessary.
- 2.d** Compliance with terms and conditions A.I.2.b. and A.I.2.c. of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.
- 2.e** The requirements of this rule also include compliance the requirements of OAC rule 3745-17-07(B)(6) and OAC rule 3745-17-08(B).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

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

<u>Material Handling Identification</u>	<u>Minimum Inspection Frequency</u>
load-out system to charge pot	weekly
transfer system to charge bucket	weekly

- 2. The purpose of the inspections is to determine the need for implementing control measures for material handling operations. The inspections shall be performed during representative, normal material handling operating conditions.
- 3. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those

inspections that were not performed due to precipitation;

- 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 measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. any periods during which inspection(s) were not performed by the required frequency, excluding an inspection which was not performed due to 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: 7.18 TPY fugitive PE

Applicable Compliance Method: The emission limitation was established by combining the emissions from all load-out operations as listed in PTI application #03-13959. The emission rate was determined as follows:

- i. load-out to charge pot- emissions associated with these load-out operations were established by multiplying the load-out rates of (varies, see application, 830,000 tons of product per year total) by the appropriate emission factor from AP-42 section 13.2.4.3 (1/95) [varies based on moisture content, see application], and dividing by 2000 lbs/ton. (1.78 tons fugitive PE/yr)
- ii. transfer to charge bucket - emissions associated with load-out operations were established by multiplying the maximum load-out rate of 860,000 tons of product per year, by the appropriate emission factor from AP-42 section 13.2.4.3 (1/95) [0.026 lb PE/ton of product], multiplied by 0.5 (as 50% of the material handled accounts for these emissions) as and dividing by 2000 lbs/ton. (5.40 tons fugitive PE/yr).

Therefore, provided compliance is shown with the requirements of this permit to apply reasonably available control measures, compliance with the ton per year PE limitation will

be assumed.

- b. Emission Limitation: visible particulate emission limitations shall not exceed 20% opacity, as a 3-minute average

Applicable Compliance Method:

Compliance with the visible emission limitation for the material handling operation(s) identified above 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