



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.
Center

RE: **DRAFT PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
LUCAS COUNTY
Application No: 04-01061

DATE: 9/24/2002

OmniSource Corp.
James Shollenberger
2453 Hill Ave.
Toledo, OH 43607

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of \$ 0 will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

TDES

Toledo Metropolitan Area Council of Gov.

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Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

DRAFT MODIFICATION OF PERMIT TO INSTALL 04-01061

Application Number: **04-01061**
APS Premise Number: **0448011189**
Permit Fee: **\$ To be entered upon final issuance**
Name of Facility: **OmniSource Corp.**
Person to Contact: **James Shollenberger**
Address: **2453 Hill Ave.**
Toledo, OH 43607

Location of proposed air contaminant source(s) [emissions unit(s)]:
5130 N. Detroit Ave.
Toledo, OHIO

Description of modification:
2 natural gas fired internal combustion engines; modification to PTI 04-1061 as issued June 11, 1997.

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

OmniSource Corp.

Facility ID: **0448011189**

PTI Application: 04-01061

Modification Issued: To be entered upon final issuance

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

SOURCE OPERATION 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 and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **OmniSource Corp.** located in **LUCAS** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>
B002	Natural gas fired internal combustion engine (11.9 MMBTU/hr) #1 engine	Natural gas fired internal combustion engine (11.9 MMBTU/hr) #2 engine
B003		3-way catalyst for control of NO _x , CO and NMHC

OmniSource Corp.

Facility ID: 0448011189

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
				0.06 ton SO ₂ /Rolling, 12-month period.
	Applicable Federal & OAC Rules	3745-31-05 3745-17-07 3745-17-11 (B)(5)	Permit Allowable Mass Emissions and/or Control/Usage Requirements	0.85 lb/MMBTU NO _x 18.9 tons NO _x /Rolling, 12-month period. 75% control efficiency for NO _x
3-way catalyst for control of NO _x , CO and NMHC	3745-31-05 3745-17-07 3745-17-11 (B)(5)		0.85 lb/MMBTU NO _x 18.9 tons NO _x /Rolling, 12-month period 75% control efficiency for NO _x	2.51 lbs/MMBTU CO 49.0 tons CO/Rolling, 12-month period 65% control efficiency for CO
			2.51 lbs/MMBTU CO 49.0 tons CO/Rolling, 12-month period 65% control efficiency for CO	0.04 lb/MMBTU NMHC 0.9 ton NMHC/Rolling, 12-month period. 40% control efficiency for NMHC.
			0.04 lb/MMBTU NMHC 0.9 ton NMHC/Rolling, 12-month period. 40% control efficiency for NMHC	0.0007 lb/MMBTU PM 0.016 ton PM/Rolling, 12-month period. 5% opacity
			0.0007 lb/MMBTU PM 0.04 ton PM/Rolling, 12-month period. 5% opacity	0.001 lb/MMBTU SO ₂ 0.02 ton SO ₂ /Rolling, 12-month period.
			0.001 lb/MMBTU SO ₂	

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>	<u>Net Emissions Increase/Decrease (Tons/YR)</u>
NO _x	37.8	-28.0
CO	98.0	+23.6
NMHC	1.8	-11.98
SO ₂	0.04	-0.08
PM	0.32	-5.17

CONSTRUCTION STATUS

The **Toledo Pollution Control Division** shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: **B002 and B003**.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Toledo Pollution Control Division, 26 Main Street, Toledo, Ohio 43605**.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

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MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Toledo Pollution Control Division, 26 Main Street, Toledo, Ohio 43605**.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Emissions units B002 and B003 are existing emissions units. No equipment changes are being made. This PTI is for an allowable emissions rate increase for NO_x, CO and NMHC. The increase in the allowable rate would cause this facility to become major based on potential to emit. Therefore, this PTI is being processed as a Synthetic Minor in order to make the emission limits for both units Federally Enforceable and to avoid Major Source and Title V status.

2. **OPERATIONAL RESTRICTIONS:**

The permittee shall use pipeline quality natural gas for combustion in B002 and B003.

The maximum combined heat input for B002 and B003 shall be 23.8 MMBTU/hr.

The maximum fuel usage for B002 and B003 combined shall be 7,424,000 cubic feet of natural gas per

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calendar month.

3. **MONITORING AND/OR RECORDKEEPING REQUIREMENTS:**

The permittee shall install, maintain and operate a meter on B002 and B003 to measure the quantity of natural gas combusted.

The permittee shall install, maintain and operate individual hour meters on B002 and B003 to record the operating hours for each unit.

The permittee shall collect and record the following information each month for B002 and B003:

- A. The total cubic feet of natural gas combusted in the emission units;
- B. The number of operating hours for each emission unit; and
- C. The combined maximum hourly heat input for B002 and B003.

4. **REPORTING REQUIREMENTS:**

The permittee shall submit deviation (excursion) reports which include all monthly records which show exceedances in the limits specified in Special Term and Condition No. 3 above.

A copy of such records shall be sent to the City of Toledo, Division of Environmental Services within 21 calendar days after the exceedance occurs.

5. **TESTING REQUIREMENTS:**

B002 and B003 shall be equipped with test ports located both before and after the three-way catalytic converters. These test ports shall be installed so as to test using U.S. EPA Test Methods 1-5.

B002 and B003 must pass both the control efficiency and mass emissions requirements.

B002 and B003 must both be operated at a minimum of 95% of their rated capacity during the compliance tests.