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Facility Name: **International Mill Service, Inc**

Application Number: **02-2503**

Date: **December 21, 1998**

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

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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.

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.

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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

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

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 **International Mill Service, Inc** located in **Trumbull** 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>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
F001	Unpaved roadways and parking areas	Water and/or suitable dust suppression chemicals	3745-31-05 3745-17-07* 3745-17-08*	PM: 16.47 TPY PM ₁₀ : 7.40 TPY **
F002	Steel slag and scrap storage piles	Water and/or suitable dust suppression chemicals	3745-31-05 3745-17-07* 3745-17-08*	PM: 6.17 TPY PM ₁₀ : 2.92 TPY **
F003	Steel slag/scrap processing (separator) plant	Wet suppression system (chemical suppressant capability) (90 percent control efficiency)	3745-31-05 3745-17-07* 3745-17-08*	PM: 3.64 pounds/hour and 15.94 TPY PM ₁₀ : 1.72 pounds/hour and 7.53 TPY **

* Less stringent than BAT.

** Subject to the attached Additional Special Terms and

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Conditions.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	38.58
PM ₁₀	17.85

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, OH 44087.**

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.

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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.

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

Introduction

This is a permit to install for a steel slag/scrap processing facility including unpaved roadways and parking areas (F001), slag and scrap storage piles (F002) and a slag/scrap processing plant (F003). The slag/scrap processing (separator) plant includes slag cooling by water sprays to temper the slag, batch loading and feeding of the processing plant, batch and continuous drop operations, conveying, slag screening, iron removal by magnetic/screen separation and product loading into storage.

A. Emission Limitations and Control Requirements

1. Unpaved Roadways and Parking Areas (F001)
 - a. There shall be no visible particulate emissions except for a period of time not to exceed three minutes during any sixty-minute period.
 - b. International Mill Service, Inc. 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. International Mill Service, Inc. shall treat the unpaved roadways and parking areas with water and/or any other suitable dust suppression chemicals at sufficient treatment

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frequencies to ensure compliance. Nothing in this paragraph shall prohibit International Mill Service, Inc. from employing other control measures to ensure compliance.

- c. The needed frequencies of implementation of the control measures shall be determined by International Mill Service, Inc.'s inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for an 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.
- d. International Mill Service, Inc. 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.
- e. 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.
- 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.
- g. Used oil shall be prohibited from use as a dust suppressant. Any material used as a dust suppressant shall be free of PCB and hazardous waste.

2. Steel Slag and Scrap Storage Piles (F002)

- a. There shall be no visible particulate emissions except for a period of time not to exceed one minute during any sixty-minute observation period.
- b. International Mill Service, Inc. shall employ best available control measures on all load-in and load-out operations associated with the storage

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piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. International Mill Service, Inc. shall treat the load-in and load-out material(s) with water and/or any other suitable dust suppression chemicals, as needed, to ensure compliance. Nothing in this paragraph shall prohibit International Mill Service, Inc. from employing other control measures to ensure compliance.

- c. The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if International Mill Service, Inc. determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- d. International Mill Service, Inc. shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. International Mill Service, Inc. shall treat each storage pile with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the International Mill Service, Inc. from employing other control measures to ensure compliance.
- e. The above-mentioned control measure(s) shall be employed for wind erosion from each pile if International Mill Service, Inc. determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage

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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.

- 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 requirements of OAC rules 3745-17-08 and 3745-31-05.
- g. Used oil shall be prohibited from use as a dust suppressant. Any material used as a dust suppressant shall be free of PCB and hazardous waste.

3. Steel Slag/Scrap Processing Plant (F003)

- a. A wet suppression system capable of achieving a control efficiency of 90 percent shall be employed to minimize or eliminate visible particulate emissions of fugitive dust generated by the steel slag/scrap processing (separator) plant. The wet suppression system shall be capable of using chemical dust suppressants for fugitive dust control. Spray nozzles shall be installed at the slag/scrap feed hopper, slag screens, batch and continuous drop transfer points, magnetic screens or conveyors, as needed, to minimize or eliminate visible particulate emissions of fugitive dust generated during slag/scrap processing.
- b. Visible particulate emissions from operations at the steel slag/scrap processing plant including slag/scrap feeding, screening, drop transfer, magnetic separation and conveying shall not exceed ten (10) percent opacity as a six-minute average.

B. Operational Restrictions

- 1. None.

C. Monitoring and Recordkeeping Requirements

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1. Unpaved Roadways and Parking Areas (F001)

- a. Except as otherwise provided in this section, International Mill Service, Inc. shall perform inspections of the unpaved roadways and parking areas in accordance with the following frequencies:

<u>unpaved roadways</u>	<u>minimum inspection frequency</u>
All	Daily

<u>unpaved parking areas</u>	<u>minimum inspection frequency</u>
All	Daily

- b. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a 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. 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.
- c. International Mill Service, Inc. may, upon receipt of written approval from the Ohio EPA Northeast 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.
- d. International Mill Service, Inc. shall maintain records of the following information:
- i. 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;
 - ii. the date of each inspection where it was determined by International Mill Service, Inc. that it was necessary to implement the control measures;

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iii. the dates the control measures were implemented; and,

iv. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d.iv. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

2. Steel Slag and Scrap Storage Piles (F002)

a. Except as otherwise provided in this section, International Mill Service, Inc. shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
All	Daily

b. Except as otherwise provided in this section, International Mill Service, Inc. shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

<u>storage pile identification inspection</u>	<u>minimum load-out frequency</u>
All	Daily

c. Except as otherwise provided in this section, International Mill Service, Inc. shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

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<u>storage pile identification</u>	<u>minimum</u>	<u>wind</u>	<u>erosion</u>
<u>inspection frequency</u>			

All

Daily

- d. 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.
- e. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit 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.
- f. International Mill Service, Inc. may, upon receipt of written approval from the Ohio EPA Northeast 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.
- g. International Mill Service, Inc. shall maintain records of the following information:
 - i. 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;
 - ii. the date of each inspection where it was determined by International Mill Service, Inc. that it was necessary to implement the control measures;
 - iii. the dates the control measures were implemented; and,
 - iv. on a calendar quarter basis, the total number

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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).

The information required in g.iv. shall be kept separately for (a) the load-in operations, (b) the load-out operations, and (c) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. International Mill Service, Inc. 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, 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. International Mill Service, Inc. shall submit required reports in the following manner:
 - a. reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA Northeast District Office; and,
 - b. quarterly written reports of (i) any deviations (excursions) from the required inspection frequencies and/or control measure implementations that have been detected by the monitoring and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA

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Northeast District Office. If no deviations occurred during a calendar quarter, International Mill Service, Inc. 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.

E. Testing Requirements

1. Compliance with the permit allowable mass emissions shall be determined in accordance with the following method:

a. Unpaved Roadways and Parking Areas (F001)

Emission Limits

16.47 tons per year particulate matter
and 7.40 tons per year PM₁₀ particulate

Applicable Compliance Method

Compliance shall be based on hours of operation and emission factors outlined in "Control of Open Fugitive Dust Sources", EPA-450/3-88-008, September, 1988.

b. Steel Slag and Scrap Storage Piles (F002)

Emission Limits

6.17 tons per year particulate matter
and 2.92 tons per year PM₁₀ particulate

Applicable Compliance Method

Compliance shall be based on hours of operation and emission factors outlined in AP-42, Sections 13.2.4 (Fifth Edition) and 8.19.1 (Fourth Edition).

c. Steel Slag/Scrap Processing Plant (F003)

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Emission Limits

3.64 pounds per hour particulate matter and 1.72 pounds per hour PM₁₀ particulate

Applicable Compliance Method

To determine the actual hourly emission rate for particulate matter, emission factors outlined in AP-42, Sections 13.2.4 (Fifth Edition) and 11.19.2 (Fourth Edition).

Emission Limits

15.94 tons per year particulate matter and 7.53 tons per year PM₁₀ particulate

Applicable Compliance Method

Compliance shall be based on hours of operation and emission factors outlined in AP-42, Sections 13.2.4 (Fifth Edition) and 11.19.2 (Fourth Edition).

2. Compliance with the visible emission limitation in Section A. of these terms and conditions shall be determined in accordance with the following method:

- a. Unpaved Roadways and Parking Areas (F001)

Emission Limitation

There shall be no visible particulate emissions except for a period of time not to exceed three minutes during any sixty-minute period.

Applicable Compliance Method

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.

- b. Steel Slag and Scrap Storage Piles (F002)

Emission Limitation

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There shall be no visible particulate emissions except for a period of time not to exceed one minute during any sixty-minute observation period.

Applicable Compliance Method

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)(c) of OAC rule 3745-17-03.

c. Steel Slag/Scrap Processing Plant (F003)

Emission Limitation

Visible particulate emissions from operations at the steel slag/scrap processing (separator) plant shall not exceed ten (10) percent opacity as a six-minute average.

Applicable Compliance Method

OAC rule 3745-17-03(B)(3) for the opacity of visible particulate emissions.

F. Miscellaneous Requirements

1. None.