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Facility Name: **Frank Sherman Company**

Application Number: **02-2620**

Date: **February 3, 1999**

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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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Frank Sherman Company** located in **Mahoning** 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.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
F001	Torch cutting operations for scrap metal	PM: No visible particulate emissions shall exceed 20% opacity as a 3-minute average. Use of best available control measures to eliminate or minimize visible emissions of fugitive dust. See Additional Special Terms and Conditions	3745-31-05 3745-17-07(B) 3745-17-08	No visible particulate emissions shall exceed 20% opacity as a 3 minute average PM: 1.45 TPY; 8 lbs/day

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

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<u>Pollutant</u>	<u>Tons/Year</u>
PM/PM ₁₀	1.45 TPY

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.

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 **Ohio EPA Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087.**

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.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Source Description

1. The emissions unit (F001) covered by this permit to install is propane/oxygen torch cutting operations for steel scrap. There are three cutting stations located at this facility.

B. Operational Restrictions

1. The permittee is prohibited from using oxygen lances or powder metal cutting.
2. The permittee shall have fire extinguishers of the appropriate type located near any cutting station(s) and they shall be employed promptly to extinguish any accidental fires caused by cutting operations.
3. The permittee shall employ accepted practices when cutting torches are being used to minimize resulting visible particulate emissions. Such practices shall include, but not be limited to, the following items: cutting metal that is clean of any oil(s) or other combustible fluids, the minimization of flame impingement with the ground, and the use of the appropriately sized cutting torch(es).
4. In accordance with OAC rule 3745-19-03, any open burning of solid waste at this facility/location is prohibited. Any accidental fires that may be caused by the torch cutting operations shall be reported.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain a monthly log of the amounts and types of metals that have been cut during that period.
2. The permittee shall maintain a daily log of the metal cutting operations including the number of cutting stations operational, the amount of metal cut and the

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number of hours each station operated per day at this facility.

3. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall report any and all accidental fires that may be caused by the torch cutting operations at this facility. A written report shall be submitted to the Ohio EPA, Division of Air Pollution Control, Northeast District Office and the Mahoning-Trumbull Air Pollution Agency no later than 15 days following the incident.

E. Testing Requirements

1. Compliance with the allowable visible emissions limitations for this source shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03, if required by the Ohio EPA.

2. **Applicable Compliance Method:** To determine compliance with the annual particulate matter (PM) limit, the following equation shall be used:

$E = \text{actual scrap processed (tons of metal processed annually)} \times 0.1 \text{ lbs/ton of metal processed} \times (1 \text{ ton}/2000 \text{ lbs})$

where:

$E = \text{particulate matter emissions (lbs/day)}$

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0.1 lbs/ton of metal processed = emissions factor in
lbs of particulate matter per ton of metal processed
(from AP-42 emissions factors; Table 7.5-1)

3. **Applicable Compliance Method:** To determine compliance with the daily particulate matter (PM) limit, the following equation shall be used:

$E = \text{actual scrap processed (tons of metal processed daily)} \times 0.1 \text{ lbs/ton of metal processed}$

where:

$E = \text{particulate matter emissions (lbs/day)}$
0.1 lbs/ton of metal processed = emissions factor in
lbs of particulate matter per ton of metal processed
(from AP-42 emissions factors; Table 7.5-1)

F. Miscellaneous

1. The permittee shall submit the appropriate permits to install and operate to the Ohio EPA, prior to the installation of any additional torch cutting stations at this facility.