



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

3/18/2013

Certified Mail

Ronald Jones II
TSB Metal Recycling, LLC - North Yard
TSB Metal Recycling, LLC - Attention Ronald L. Jones II
767 Flora Avenue
Akron, OH 44314

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1677011263
Permit Number: P0112296
Permit Type: Renewal
County: Summit

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Akron Beacon Journal. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
ARAQMD; Pennsylvania; West Virginia; Canada

PUBLIC NOTICE
3/18/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

TSB Metal Recycling, LLC - North Yard

767 Flora Ave,

Akron, OH 44314

Summit County

FACILITY DESC.: Recyclable Material Merchant Wholesalers

PERMIT #: P0112296

PERMIT TYPE: Renewal

PERMIT DESC: Renewal FEPTIO for natural gas engines, storage piles, and metal shredder/separator.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Kelly Kanoza, Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308. Ph: (330)375-2480



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: TSB Metal Recycling, LLC - North Yard is a waste/secondary metal processing operation doing business as City Scrap & Salvage Company. The facility has requested a federally enforceable permit-to-install and operate (FEPTIO) for the following emissions units located at 767 Flora Avenue in Akron, Ohio:

EU ID	DAPC Description	Installation Date
B002	Engine A, Waukesha Model VHPL7042GSI V12 natural gas-fired, 4-stroke/rich-burn, internal combustion engine [12.0 MMBtu/hr maximum rated heat input, 1650 Bhp maximum rated power output] driving a scrap metal shredder.	2/1/2005
B003	Engine B, Waukesha Model VHPL7042GSI V12 natural gas-fired, 4-stroke/rich-burn, internal combustion engine [12.0 MMBtu/hr maximum rated heat input, 1650 Bhp maximum rated power output] driving a scrap metal shredder.	2/1/2005
F001	Storage piles and associated material handling equipment.	6/1/1947
P001	Shredder/Hammermill with magnetic material separator and a water spray chamber to control fugitive dust.	6/1/1988

3. Facility Emissions and Attainment Status: Particulate emissions are generated from material handling and metal shredding; products of natural gas combustion, mainly nitrogen oxides (NO_x) and carbon monoxide (CO), are emitted from the engines. TSB Metal Recycling, LLC – North Yard is located in Summit County, which is in attainment for all criteria air pollutants, except for ozone and particulate matter with an aerodynamic diameter of 2.5 microns or less (PM_{2.5}).
4. Source Emissions: The permittee has agreed to federally-enforceable operational restrictions, which limit annual natural gas usage to 54.4 million cubic feet per rolling, 12-month period in order to keep potential NO_x and CO emissions below Title V major source thresholds. The facility-wide annual emission limitations are 99.0 tons of NO_x and 99.0 tons of CO per rolling, 12-month period.
5. Conclusion: Compliance with the rolling, 12-month natural gas usage restriction, in accordance with the associated monitoring, recordkeeping and reporting requirements, will ensure this facility remains a synthetic minor source, through OAC rule 3745-31-05(D), with respect to NO_x and CO emissions. Issuance of FEPTIO #P0112296 is recommended.
6. Please provide additional notes or comments as necessary: Emissions units B002, B003, F001, and P001 were previously permitted by federally enforceable state operating permit (FESOP) #P0102699 under facility ID #1677010437. After the transfer of ownership in 2011, the old facility ID was split and then shutdown when the company's office building and several storage piles were moved from 611 West Wilbeth Road to 760 Flora Avenue (TSB Metal Recycling, LLC – South Yard, facility ID



#1677011261), but the emissions units in the North Yard (B002, B003, F001 and P001) always remained where they had originally been installed (767 Flora Avenue, facility ID #1677011263).

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
NO _x	99.0
CO	99.0



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
TSB Metal Recycling, LLC - North Yard**

Facility ID:	1677011263
Permit Number:	P0112296
Permit Type:	Renewal
Issued:	3/18/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
TSB Metal Recycling, LLC - North Yard

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Draft Permit-to-Install and Operate

TSB Metal Recycling, LLC - North Yard

Permit Number: P0112296

Facility ID: 1677011263

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1677011263
Application Number(s): A0046385
Permit Number: P0112296
Permit Description: Renewal FEPTIO for natural gas engines, storage piles, and metal shredder/separator.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 3/18/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

TSB Metal Recycling, LLC - North Yard
767 Flora Ave
Akron, OH 44314

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0112296
Permit Description: Renewal FEPTIO for natural gas engines, storage piles, and metal shredder/seperator.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	B002
Company Equipment ID:	1650 BHP Natural Gas Fired Internal Combustion Engine
Superseded Permit Number:	16-02380
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B003
Company Equipment ID:	1650 BHP Natural Gas Fired Internal Combustion Engine
Superseded Permit Number:	16-02380
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F001
Company Equipment ID:	Material handling and storage piles
Superseded Permit Number:	P0102699
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P001
Company Equipment ID:	Shredder and material separator
Superseded Permit Number:	16-660
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
TSB Metal Recycling, LLC - North Yard
Permit Number: P0112296
Facility ID: 1677011263
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate

TSB Metal Recycling, LLC - North Yard

Permit Number: P0112296

Facility ID: 1677011263

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(1) Facility-wide emissions shall not exceed the following limitations based upon a rolling, 12-month summation of the monthly emissions:

a. 99.0 tons per year of nitrogen oxides (NO_x); and

b. 99.0 tons per year of carbon monoxide (CO).

These federally enforceable emission limitations are being established for the purpose of avoiding Title V major source applicability. To ensure these limits are met, the permittee has committed to meet the natural gas operational restriction under b)(2) below.

(2) The maximum annual natural gas usage for this facility shall not exceed 54.4 million cubic feet, based upon a rolling, 12-month summation of the monthly natural gas usage.

(3) The permittee shall maintain monthly records of the following information:

a. the facility-wide natural gas usage, in million cubic feet;

b. the rolling, 12-month summation of the monthly facility-wide natural gas usage [i.e., the amount of natural gas used for the present month, as recorded in b)(3)a., plus the previous 11 months of operation];

c. the facility-wide emissions of NO_x, in tons;

d. the rolling, 12-month summation of the monthly NO_x emissions [i.e., the NO_x emissions for the present month, as recorded in b)(3)c., plus the previous 11 months of operation];

e. the facility-wide emissions of CO, in tons; and

f. the rolling, 12-month summation of the monthly CO emissions [i.e., the CO emissions for the present month, as recorded in b)(3)e., plus the previous 11 months of operation].

This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of CO and NO_x emissions and natural gas usage upon issuance of this permit.



- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the rolling, 12-month summation of natural gas usage;
 - ii. the rolling, 12-month emission limitation for NO_x;
 - iii. the rolling, 12-month emission limitation for CO;
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or Local Air Agency).

- (5) Compliance with the emissions limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitations:
 - 99.0 tons of NO_x per rolling, 12-month period
 - 99.0 tons of CO per rolling, 12-month period
- Applicable Compliance Method:
- Compliance with the annual allowable NO_x and CO emission limitations identified above shall be demonstrated by the monitoring and record keeping requirements specified in b)(3).

2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (Area Source RICE MACT). Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the



Draft Permit-to-Install and Operate

TSB Metal Recycling, LLC - North Yard

Permit Number: P0112296

Facility ID: 1677011263

Effective Date: To be entered upon final issuance

authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



Draft Permit-to-Install and Operate
TSB Metal Recycling, LLC - North Yard
Permit Number: P0112296
Facility ID: 1677011263
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. F001, Storage Piles/Material Handling

Operations, Property and/or Equipment Description:

Storage piles and associated material handling equipment.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)(6)	No visible particulate emissions (PE) from any material storage pile except for a period of time not to exceed 13 minutes during any 60-minute observation period.
b.	OAC rule 3745-17-08(B)	See b)(2)a. through b)(2)e.

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to maintain minimal drop heights for stackers and front-loaders, and chemical stabilization/dust suppressants and/or watering/sprinkling systems at sufficient treatment frequencies to ensure compliance.



Effective Date: To be entered upon final issuance

- b. The operator shall avoid dragging any front-end loader bucket along the ground except during the processes of sorting scrap, loading scrap into the bucket, or cleaning up heavy debris. Nothing in this paragraph shall prohibit the permittee from employing other equally-effective 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 the permittee 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. The permittee 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. In accordance with the application, the permittee has committed to perform one or more of the following: (chemical stabilization, watering/sprinkling systems/hoses, covering the storage piles) to ensure compliance. Nothing in this paragraph shall prohibit the permittee 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 the permittee 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 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.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

Storage Pile Identification	Minimum Load-in Inspection Frequency
all	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	Minimum Load-out Inspection Frequency
all	weekly



Effective Date: To be entered upon final issuance

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

Storage Pile Identification	Minimum Wind Erosion Inspection Frequency
all	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 the control measure 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.
- (6) 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 measure;
 - c. the dates the control measure was implemented; and
 - d. on a calendar quarter basis, the total number of days the control measure was 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.

The information required in d)(6)d. shall be kept separately for the load-in operations, the load-out operations, and the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

No visible PE from any material storage pile except for a period of time not to exceed 13 minutes during any 60-minute observation period.

Applicable Compliance Methods:

If required, compliance with the visible PE limitation identified above shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-17-03(B)(4).

g) Miscellaneous Requirements

(1) None.



2. P001, Shredder and Material Separator

Operations, Property and/or Equipment Description:

Shredder/Hammermill with magnetic material separator and a waterspray chamber to control fugitive dust.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 16-660 issued on 4/13/1988	Particulate emissions (PE) shall not exceed 12.0 pounds per hour.
b.	OAC rule 3745-17-07(B)(1)	Visible PE from any fugitive dust source shall not exceed 20% opacity, as a 3-minute average.
c.	OAC rule 3745-17-08(B)	See b)(2)a. and b)(2)b.

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures (RACM) for this emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to perform the following control measure(s) to ensure compliance:



Effective Date: To be entered upon final issuance

Material Handling Operations	Control Measures
shredder/hammermill	water spray/dust buster foam
separators	water spray
conveyors/transfer points	use of sufficient water spray in the shredder/separator

Nothing in this section shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.

b. For each material handling operation that is not adequately enclosed, the control measures identified above shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure is necessary to ensure compliance with the applicable emission limitation. Any required implementation of a control measure shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure is unnecessary.

c) Operational Restrictions

- (1) The permittee shall ensure that gas tanks and batteries have been removed from all vehicles prior to being put into the shredder/hammermill.
- (2) When using water spray, the water flow rate shall be continuous and sufficient to minimize or eliminate emissions of fugitive dust.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, for material handling and processing operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following frequencies:

Material Handling Operations	Minimum Inspection Frequency
shredder/hammermill	weekly, when in operation
separators	weekly, when in operation
conveyors/transfer points	weekly, when in operation

- (2) The above-mentioned inspections shall be performed during a time which is representative of normal operating conditions.
- (3) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s):



- c. the dates the control measure(s) was (were) implemented; and
- d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in d)(4)d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

12.0 lbs PE/hr

Applicable Compliance Methods:

Compliance with the hourly allowable PE limitation identified above shall be demonstrated by using the emission factor of 1.4773 lbs PE/hr for the shredder and 0.7552 lb PE/hr for each separator.* The total emissions from the shredder and two separators are 2.99 lbs PE/hr.

*Note: The PE factors were obtained by taking the average of nine performance tests conducted by The Institute of Scrap Recycling Industries (ISRI) on similar shredders and separators.

If required, compliance with the hourly PE limitation shall be determined by stack testing in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

Visible PE from any fugitive dust source shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Methods:

If required, compliance with the visible PE limitation identified above shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-17-03(B)(3).



Draft Permit-to-Install and Operate

TSB Metal Recycling, LLC - North Yard

Permit Number: P0112296

Facility ID: 1677011263

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



3. Emissions Unit Group - Engines: B002, B003

EU ID	Operations, Property and/or Equipment Description
B002	Engine A, Waukesha Model VHPL7042GSI V12 natural gas-fired, 4-stroke/rich-burn, internal combustion engine [12.0 mmBtu/hr maximum rated heat input, 1650 Bhp maximum rated power output] driving a scrap metal shredder.
B003	Engine B, Waukesha Model VHPL7042GSI V12 natural gas-fired, 4-stroke/rich-burn, internal combustion engine [12.0 mmBtu/hr maximum rated heat input, 1650 Bhp maximum rated power output] driving a scrap metal shredder.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), PTI 16-02380 issued 12/30/2004	Nitrogen oxides (NO _x) emissions shall not exceed 50.0 pounds per hour; Carbon monoxide (CO) emissions shall not exceed 50.0 pounds per hour; and Visible particulate emissions (PE) from any stack shall not exceed 1% opacity, as a 6-minute average. See b)(2)a., b)(2)b., and c)(1)
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V	See b)(2)c.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	See b)(2)d.
d.	OAC rule 3745-17-11(B)(5)	PE shall not exceed 0.062 pound per million Btu of actual heat input.
e.	OAC rule 3745-110-03(F)	Exempt. See b)(2)e.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-17-11(B)(5).
- b. The hourly NO_x and CO emissions limitations established pursuant to OAC rule 3745-31-05(A)(3) are greater than the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emissions limitations.

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed change such as equipment modification that would increase the potential to emit for any air pollutant.

- c. Emissions units B002 and B003 are part of the facility-wide, federally enforceable emission limitations and operational restrictions established for the purpose of avoiding Title V applicability for NO_x and CO emissions under Section B.1.b) of this permit.
- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- e. Pursuant to OAC rule 3745-110-03(J)(3), any stationary internal combustion engine having an energy output capacity of less than two thousand horsepower is exempt from the requirements of this rule.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

50.0 lbs NO_x/hr

Applicable Compliance Methods:

Compliance with the hourly allowable NO_x emission limitation identified above shall be demonstrated by multiplying the emission factor of 2.21 lb NO_x/mmBtu (AP-42 Table 3.2-3, July 2000) by the engine's maximum rated heat input of 12.0 mmBtu/hr.

If required, compliance with the hourly NO_x emission limitation shall be determined by stack testing in accordance with Method 7E of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

50.0 lbs CO/hr

Applicable Compliance Methods:

Compliance with the hourly allowable CO emission limitation identified above shall be demonstrated by multiplying the emission factor of 3.72 lb CO/mmBtu (AP-42 Table 3.2-3, July 2000) by the engine's maximum rated heat input of 12.0 mmBtu/hr.

If required, compliance with the hourly CO emission limitation shall be determined by stack testing in accordance with Method 10 of 40 CFR Part 60, Appendix A.

c. Emission Limitation:

Visible PE from any stack shall not exceed 1% opacity, as a 6-minute average.



Applicable Compliance Methods:

If required, compliance with the allowable opacity limitation identified above shall be determined by visible emissions evaluations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:

0.062 lb PE/mmBtu of actual heat input

Applicable Compliance Methods:

Compliance with the allowable particulate emission limitation identified above shall be demonstrated by multiplying the emission factor of 0.0095 lb PE/mmBtu (AP-42 Table 3.2-3, July 2000) by the engine's actual heat input.

If required, compliance with the lb PE/mmBtu emission limitation shall be determined in accordance with OAC rule 3745-17-03(B)(10).

g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.