State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**

LUCAS COUNTY
Application No: 04-00529
Fac ID: 0448011575

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 8/10/2006

Toledo Shredding LLC
Michael McVey
275 Millard Ave, Bldg 3
Toledo, OH 43605

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **TDES**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 04-00529

Application Number: 04-00529

Facility ID: 0448011575

Permit Fee: **$1350**

Name of Facility: Toledo Shredding LLC

Person to Contact: Michael McVey

Address: 275 Millard Ave, Bldg 3
Toledo, OH 43605

Location of proposed air contaminant source(s) [emissions unit(s)]:
275 Millard Ave., Bldg 3
Toledo, **Ohio**

Description of proposed emissions unit(s):
Metal Salvage Operations, modification.

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

Joseph P. Koncelik

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and

regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions

may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
PE	14.27 (0.01 increase)
VOC	47.00 (11.82 increase)

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F002 - roadways and parking lots, modification	OAC rule 3745-31-05(A)(3)	3.86 tons per year of particulate emissions (PE) total from paved and unpaved areas
paved roadways and parking areas (see Section A.2.a)	OAC rule 3745-31-05(A)(3)	best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.d and A.2.g through A.2.l)
	OAC rule 3745-17-07(B)(4)	no visible particulate emissions except for 6 minutes during any 60-minute period
	OAC rule 3745-17-08(B), (B)(7), (B)(8), (B)(9)	less stringent than the above-mentioned control measure requirements
unpaved roadways and parking areas (see Section A.2.e)	OAC rule 3745-31-05(A)(3)	best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.f through A.2.l)
	OAC rule 3745-17-07(B)(5)	no visible particulate emissions except for 13 minutes during any 60-minute period
	OAC rule 3745-17-08(B), (B)(2), (B)(7), (B)(8), (B)(9)	less stringent than the above-mentioned control measure requirements

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2. Additional Terms and Conditions

2.a The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

paved roadways:

main entrance
service road

paved parking areas:

employee parking
maintenance parking

2.b The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by sweeping at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.c The permittee shall employ best available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved shoulders of all paved roadways with chemical dust suppressant at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.d The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(4).

2.e The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

unpaved roadways:

interior service road
exterior service road

unpaved parking areas:

non-ferrous parking

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2.f The permittee 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. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with chemical dust suppressant at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.g The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or 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.

2.h Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.

2.i The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(5).

2.j The permittee 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.

2.k 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.

2.l 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.

B. Operational Restrictions

None

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C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

paved roadways and parking areas	minimum inspection frequency
A1 - Main Entrance	weekly
A4 - Service Road	weekly

unpaved roadways and parking areas	minimum inspection frequency
A5 - Interior Service Road	daily
A6 - Exterior Service Road	daily
A7 - Non-ferrous Parking	daily

2. 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, except if the next required inspection is within one week.

3. For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

4. The permittee shall maintain records of the following information:

   a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

   b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

   c. the dates the control measures were implemented; and

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d. 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 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit semi-annual 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. These semi-annual deviation reports shall be submitted to the Toledo Division of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6 calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

   a. Compliance with the emission limitation for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with 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. Emission Limitation:

      3.86 tons per year of particulate emissions (PE) total from paved and unpaved areas

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Applicable Compliance Method:

Compliance with the above annual particulate emission limitation shall be determined by the following equations:

Paved Roads:

Compliance with fugitive PE limitations shall be determined by using the emission factor equations in Section 13.2.1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for paved roadways. Should further updates in AP-42 occur, the most current equations for paved roads shall be used.

Unpaved Roads:

Compliance with fugitive PE limitations shall be determined by using the emission factor equations in Section 13.2.2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 12/03) for unpaved roadways. Should further updates in AP-42 occur, the most current equations for unpaved roads shall be used.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P901 - material handling systems, modification (see Section A.2.a)	OAC rule 3745-31-05(A)(3)	best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.c), 4.83 tons per year of fugitive particulate emissions, and see Section A.2.d
	OAC rule 3745-17-07(B)(1)	visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average
	OAC rule 3745-17-08(B), (B)(3)	less stringent than the above-mentioned control measure requirements

2. Additional Terms and Conditions

2.a The material handling operation(s) that are covered by this permit and subject to the requirements of OAC rules 3745-31-05(A)(3) are listed below:

crushed autos/scrap metal conveyors;
ferrous aggregate conveyors;
non-ferrous aggregate conveyors;
waste conveyors;
separators; and
screens.

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2.b The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee has committed to perform the following control measure(s) to ensure compliance:

material handling operation(s)	control measure(s)
crushed autos/scrap metal conveyors	minimize drop height
ferrous aggregate conveyors	adequate enclosure and moisture
non-ferrous aggregate conveyors	adequate enclosure and moisture
waste conveyors;	adequate enclosure and moisture
separators and screens	adequate enclosure and moisture

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.c For each material handling operation that is not adequately enclosed, the above-identified control measure(s) 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(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.

2.d The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B)(1).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

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

material handling operation(s)	minimum inspection frequency
crushed autos/scrap metal conveyor	daily
ferrous aggregate conveyor	daily
non-ferrous aggregate conveyor	daily

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waste conveyor;	daily
separators and screens	daily

2. The above-mentioned inspections shall be performed during representative, 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 semi-annual basis, the total number of days the control measure(s) was (were) implemented.

   The information in Section 3.d shall be kept separately for each material handling operation identified above.

4. For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

D. Reporting Requirements

1. The permittee shall submit semi-annual deviation reports that identify any of the following occurrences:

   a. each day during which an inspection was not performed by the required frequency; and

   b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

   These semi-annual deviation reports shall be submitted to the Toledo Division of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6 calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

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E. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

   a. Compliance with the visible emission limitation for the material handling operation(s) identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

   b. Emissions Limitations:

      4.83 tons per year of particulate emissions (PE)

      Applicable Compliance Method:

      Compliance with fugitive PE limitations shall be determined by using the emission factor equations in Sections 11.19.2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 8/04), for transfer and screening operations.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P902 - metal salvage operations, modification	OAC rule 3745-31-05(A)(3)	particulate emissions (PE) from the venturi scrubber stack (stack no. 1) shall not exceed 1.11 pounds per hour, PE from the ferrous cyclone vent stack (stack no. 2) shall not exceed 0.35 pound per hour, fugitive PE shall not exceed 2.26 pounds per hour, total PE shall not exceed 5.58 tons per year, visible particulate emissions shall not exceed 20% opacity as a 6-minute average from the venturi scrubber stack, or 5% opacity as a 6-minute average from stack no. 2, volatile organic compound emissions (VOC) from the venturi scrubber stack shall not exceed 29.82 pounds per hour, fugitive VOC shall not exceed 1.51 pounds per hour, total VOC shall not exceed 47.00 tons per year, best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Section A.2.a), and
	OAC rule 3745-17-07(A)(1)	see Sections A.2.b through A.2.d

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OAC rule 3745-17-07(B)(1)	see Section A.2.e below visible emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average
OAC rule 3745-17-08(B), (B)(3)	see Section A.2.e below
OAC rule 3745-17-11(B)(1)	see Section A.2.e below

2. Additional Terms and Conditions

2.a The permittee shall maintain a water spray system within the hammermill to control fugitive visible particulate emissions from the shredder operation.

2.b The permittee shall remove or drain all gas tanks from vehicles before they are shredded.

2.c The permittee shall remove oil from the surface of the sump pit circulation water.

2.d The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B)(1).

2.e The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

1. The operation of the shredder/hammermill shall not exceed 3,000 hours per rolling, 12-month period. To ensure enforceability during the first twelve calendar months of operation, following the issuance of this permit, actual hours of operation derived from records from the previous 11 calendar months of operation shall be used to calculate the rolling, 12-month hours of operation of this emissions unit.

2. The pressure drop across the scrubber shall be maintained at a value of not less than 14 inches of water column at all times while the emissions unit is in operation.

3. The scrubber water flow rate shall be maintained at a value of not less than the minimum level established during the most recent stack test which determined compliance at all times while the emissions unit is in operation.

4. The hammermill spray system shall be automatically controlled and shall maintain a minimum water application rate of 20 gallons per minute during all times that the shredder motor amperage exceeds 425 amperes.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the monthly hours of operation and the rolling, 12-month summation of operating hours.

2. The permittee shall operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and to monitor daily the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

3. The permittee shall operate and maintain equipment to continuously monitor the shredder motor amperage and the hammermill spray system water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

4. The permittee shall collect and record the following information each day:

   a. the pressure drop across the scrubber, in inches of water column, on a continuous basis;

   b. the water application rate at the scrubber, in gallons per minute, on a once per day basis;

   c. the hammermill motor amperage, in amperes, on a continuous basis:

   d. the water application rate at the hammermill, in gallons per minute, on a continuous basis; and

   e. the downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

5. The permittee shall maintain daily records that document any time periods when oil removal from the sump pit was not being performed while the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit to the Toledo Division of Environmental Services semi-annual deviation (excursion) reports that identify:

   a. the number of hours this emissions unit was operating each month and the rolling, 12-month summation of operating hours for each month in the reporting period;

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b. all periods of time during which the static pressure drop across the scrubber was not maintained at or above the required level;

c. all periods of time during which the water application rate at the scrubber was not maintained at or above the required level;

d. all periods of time during which the water application rate at the hammermill was not maintained at or above the required level;

e. all periods of time during which the capture system, control device and/or monitoring equipment was not in service while the emissions unit was in operation; and

f. any daily record showing that oil removal from the sump pit was not being performed while the emissions unit was in operation.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation;

20% opacity from stack no. 1

Applicable Compliance Method;

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

b. Emission Limitation;

5% opacity from stack no. 2

Applicable Compliance Method;

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods

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and procedures specified in OAC rule 3745-17-03(B)(1). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

visible emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

d. Emission Limitation:

1.11 pounds per hour of particulate emissions from stack no. 1

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

e. Emission Limitation:

0.35 pound per hour of particulate emissions from stack no. 2

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

f. Emission Limitation:

fugitive PE shall not exceed 2.26 pounds per hour

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Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance shall be demonstrated by maintaining compliance with the visible emissions limitations above.

g. Emission Limitation:

5.58 tpy of particulate emissions

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at 3000 hours per year of operation. Compliance may be demonstrated through calculations performed as follows: multiply the sum of the short term emission rates (1.11, 0.35 and 2.26 pounds of PE per hour) by the actual annual hours of operation per rolling, 12-month period and divide by 2,000 pounds per ton.

h. Emission Limitation:

29.82 pounds per hour of VOC from stack no. 1

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. The results of the stack testing shall be reported as pounds of VOC per hour as propane. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

i. Emission Limitation:

fugitive VOC shall not exceed 1.51 pounds per hour

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance shall be demonstrated by maintaining compliance with the visible emissions limitations above.

j. Emission Limitation:

47.00 tons of VOC per year.

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Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at 3000 hours per year of operation. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rates (29.82 and 1.51 pounds of VOC per hour) by the actual annual hours of operation per rolling, 12-month period and divide by 2,000 pounds per ton.

F. Miscellaneous Requirements

None

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