

Facility ID: 0125040225 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0125040225 Emissions Unit ID: P901 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
50 ton/hr hammermill with water injection control and fluff removal vented to cyclone.	OAC rule 3745-31-05(A)(3) (PTI 01-6468)	Particulate emissions (PE) in the exhaust gases from the cyclone stack shall not exceed 1.8 lbs/hr and 5.6 tons/yr. Fugitive PE shall not exceed 1.4 lbs/hr and 4.4 tons/yr. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See A.2.a through A.2.c.
	OAC rule 3745-17-08(B)(3)	Visible PE from the cyclone stack shall not exceed 5% opacity, as a 6-minute average. The emissions limitation specified by this rule is less stringent than the above-mentioned control measure requirements.
	OAC rule 3745-17-07(B)	Visible PE from any fugitive dust source shall not exceed 20% opacity, as a 3-minute average.
	OAC rule 3745-17-07(A)(1)	The emissions limitation specified by this rule is less stringent than the above-mentioned control measure requirements.

2. Additional Terms and Conditions

- (a) The material handling operations that are covered by this permit and subject to the above-mentioned requirements are listed below:

Fluff separation
Conveyor to stockpile
Scrap load out

The permittee shall employ best available control measures for the above-identified material handling operation(s) 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 perform the following control measure to ensure compliance:

material handling operations control measures

Fluff separation enclosure vented to cyclone
Conveyor to stockpile windbreak
Scrap loadout windbreak

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

For each material handling operation that is not adequately enclosed, the above-identified control measures 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 measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the

control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measure is unnecessary.

B. Operational Restrictions

1. Water sprays shall be operated at points necessary to ensure compliance with the visible PE limitations specified above.

C. Monitoring and/or Record Keeping 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 operations minimum inspection frequency

Fluff separation daily
Conveyor to stockpile daily
Scrap load out daily

2. The above-mentioned inspections shall be performed during representative, normal operating conditions.
3. The permittee may, upon receipt of written approval from the Ohio EPA, CDO, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The operations log shall be maintained on site.

D. Reporting Requirements

1. The permittee shall submit quarterly 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.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

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:

Emission Limitations:

PE in the exhaust gases from the cyclone stack shall not exceed 1.8 lbs/hr and 5.6 tons/yr.

Applicable Compliance Method:

The hourly PE may be calculated by multiplying an emission factor times the maximum process weight multiplied by control efficiency for the cyclone as follows:

$0.36 \text{ lb PM}_{10}/\text{ton}^* \times 50 \text{ tons metal/hr} \times 0.9^{**} = 1.8 \text{ lb/hr}$.

* emission factor from the SCC document (3-04-007-12)

** the control efficiency for cyclone is assumed to be 90%

This allowable emission rate is the potential to emit for this emissions unit. Therefore, as long as the control efficiency is maintained at 90% or greater, as demonstrated by compliance with the VE limitation, compliance with the allowable emission rate shall also be maintained.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 6,250 hrs and then dividing by 2000).

Emission Limitations:

Fugitive PE shall not exceed 1.4 lbs/hr and 4.38 tons/yr.

Applicable Compliance Method:

The hourly fugitive PE may be calculated by multiplying an emission factor times the maximum process weight multiplied by the control efficiency and summing the calculated PE from the shredder and 2 transfer points as follows:

$0.36 \text{ lb PM}_{10}/\text{ton}^* \times 50 \text{ tons metal/hr} \times 0.02^{**} = 0.4 \text{ lb/hr}$.

$0.36 \text{ lb PM}_{10}/\text{ton}^* \times 50 \text{ tons metal/hr} - 0.4 \text{ lb/hr} \times 0.03^{***} = 0.53 \text{ lb/hr}$.

$0.36 \text{ lb PM}_{10}/\text{ton}^* \times 50 \text{ tons metal/hr} - 0.93 \text{ lbs/hr} \times 0.03^{***} = 0.51 \text{ lb/hr}$

* emission factor from the SCC document (3-04-007-12)

** the control efficiency of water injection is assumed to be 98%

*** the control efficiency for a wind break is assumed to be 97%

This allowable emission rate is the potential to emit for this emissions unit. Therefore, as long as the control efficiency is maintained at 98% or greater, as demonstrated by compliance with the VE limitations, compliance with the allowable emission rate shall also be maintained.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 6,250 hrs, and then dividing by 2000).

Emission Limitation:

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

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

Emission Limitation:

Visible PE from the cyclone stack shall not exceed 5% opacity, as a 6-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

F. **Miscellaneous Requirements**

1. None