

Additional Terms and Conditions
Selsu Industries
02-50-11-0981 (F001)

A. Source Description

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

B. Operational Restrictions

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

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain a monthly log of the amounts and types of metals that have been cut during that period.
2. The permittee shall maintain a daily log of the metal cutting operations including the number of cutting stations operational, the amount of metal cut and the number of hours each station operated per day at this facility.
3. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by

the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

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

E. Testing Requirements

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

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

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

where:

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

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

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

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

where:

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

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

F. Miscellaneous

The permittee shall submit the appropriate permits to install and operate to the Ohio

EPA, prior to the installation of any additional torch cutting stations at this facility.

F002

A. Source Description

The emissions unit (F002) covered by this permit to install is for unpaved roadways and parking areas at the above referenced facility.

B. Additional Terms and Conditions

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

unpaved roadways:

Gravel Roadways as indicated on the facility wide map, submitted with PTI application No. 02-12619.

unpaved parking areas:

Gravel Parking Areas as indicated on the facility wide map, submitted with PTI application No. 02-12619.

2. 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. The permittee may be required to treat the unpaved roadways and parking areas with water and/or other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. The permittee may also be required to employ surface improvement control measures on the unpaved roadways and parking areas. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
3. 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 an unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
4. 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 using any combination of flushing, sweeping, and/or watering. 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 a visible emission limitation of no visible particulate emissions except for one minute during any 60-minute period.

5. 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.
6. 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.
7. 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.

C. Monitoring and/or Recordkeeping Requirements

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

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

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

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. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, 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 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
 - 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 updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. 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.)

E. Testing Requirements

1. Compliance with the emission limitation for the 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.
2. Compliance with the annual mass emission rates for PM shall be determined by using the equations and methods in AP-42, section 13.2.2, "Unpaved Roads" as it appears in the most recent version.