



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL**  
**JEFFERSON COUNTY**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 06-91674**

**DATE: 3/1/00**

Olympic Mill Services  
Keith Pyles  
1014 W Ninth St  
King of Prussia, PA 19406

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA

SEDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 3/1/00

**FINAL PERMIT TO INSTALL 06-91674**

Application Number: 06-91674  
APS Premise Number: 0641090127  
Permit Fee: **\$1600**  
Name of Facility: Olympic Mill Services  
Person to Contact: Keith Pyles  
Address: 1014 W Ninth St  
King of Prussia, PA 19406

Location of proposed air contaminant source(s) [emissions unit(s)]:

**Commercial Ave and Cool Springs Rd  
Mingo Junction, Ohio**

Description of proposed emissions unit(s):

**Button lancing operation and associated material handling activities.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



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 Related to Monitoring and Recordkeeping 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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

**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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

Olympic Mill Services  
 PTI Application: 06-91674  
 Issued: 3/1/00

Facility ID: 0641090127

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**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	4.91

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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.

OAC rule 3745-17-08(B)

Operations, Property,  
and/or Equipment

Applicable Rules/Requirements

Iron/steel button lancing operation with two lances utilizing carbon dioxide suppression	OAC rule 3745-31-05(A)(3)
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OAC rule 3745-17-07(B)

OAC rule 3745-17-08(B)

Button lancing material handling activities	OAC rule 3745-31-05(A)(3)
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OAC rule 3745-17-07(B)

Applicable Emissions  
Limitations/Control Measures

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.e);

2.80 pounds PM per hour maximum emissions;

4.91 tons PM per year maximum emissions;

Visible particulate emissions shall not exceed twenty per cent opacity as a three-minute average for button lancing activities;

Equivalent to 31-05

Visible particulate emissions shall not exceed ten per cent opacity as a six-minute average for button lancing material handling activities (see A.2.f, below);

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.e)

Less stringent than 31-05

Equivalent to 31-05

**2. Additional Terms and Conditions**

**2.a** The operations that are covered by this permit and subject to the above-mentioned requirements are listed below:

- i. Two button lancing stations;
- ii. Button lancing material handling operations.

**2.b** The permittee shall employ best available control measures for the above-identified operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the submitted permit application, the permittee has committed to perform the following control measures to ensure compliance:

operation(s)	control measure(s)
Button lancing operations	Use of CO2 suppression at all times during all lancing operations.
Button lancing material handling operations	Use of water sprays to adequately wet buttons during handling, including unloading and loading; Minimize material drop height from front end loader bucket to truck.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance, as described below. Ohio EPA may require additional control measures at any or all operations described above if deemed necessary based on observed visible emissions.

**2.c** For each operation that is not adequately enclosed, the above-identified control measures shall be implemented at all times during operation. If the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that additional control measures are necessary to ensure compliance with the above-mentioned applicable requirements, such additional control measures shall be implemented immediately. Any required implementation of the additional control measures shall continue during operation until further observation confirms that use of these additional control measures is unnecessary.

**2.d** Specific additional control measures shall be determined by the permittee. Such additional control measures for button lancing operations may include increased CO2 flow, use of portable baghouse units, or shut-down of operations. Such additional control measures for

material handling operations may include increased water application, use of chemical dust suppressant, or shutdown of operations. The use of additional control measures shall, at all times, comply with all air, surface water, ground water, solid waste, and hazardous waste laws and regulations.

- 2.e Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05.

## B. Operational Restrictions

1. OMS shall utilize the CO<sub>2</sub> suppression system at all times in accordance with manufacturer's recommendations during all lancing activities. CO<sub>2</sub> shall be delivered through the lance at sufficient pressure and flow rate to minimize or eliminate visible emissions of fugitive dust.
2. In the event that OMS fails to utilize or incorrectly utilizes CO<sub>2</sub> suppression during button lancing operations, visible emissions shall be evaluated from such affected points upon discovery. Should observations indicate a potential or actual violation of visible emissions limitations, one or more of the following shall be performed until normal control measures are restored:
  - a. Immediately establish CO<sub>2</sub> flow at correct rate and pressure from permanent or portable tanks;
  - b. Utilize portable baghouse unit(s) to achieve a control efficiency equivalent to that of CO<sub>2</sub> suppression;
  - c. Shut down the affected sources until repairs/corrections are made.
3. All oxygen and carbon dioxide tanks associated with the button lancing operations shall be equipped with the following gauges:
  - a. Pressure gage;
  - b. Gauge capable of displaying the volume or weight of gas or liquid present in tank.
4. Lancing operations shall not be performed if CO<sub>2</sub> pressure falls below 150 psig or if it is otherwise determined that the CO<sub>2</sub> tank(s) do not contain sufficient CO<sub>2</sub> to supply the lancing operations for the duration of the activity.
5. OMS shall apply an adequate amount of water to all buttons prior to handling. Material handling operations shall not be conducted with hot material or material that has not been adequately wetted, as determined through Monitoring and Record keeping Requirements C.1, below.

Emissions Unit ID: F018

6. In the event that OMS fails to adequately wet and/or cool button lancing materials prior to handling, visible emissions shall be evaluated from such affected points upon discovery. Should observations indicate a potential or actual violation of visible emissions limitations, one or more of the following shall be performed until normal control measures are restored:
  - a. Immediately apply adequate water or other suitable dust suppressant to the material;
  - b. Shut down the affected sources until repairs/corrections are made.

**C. Monitoring and/or Recordkeeping Requirements**

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

operation(s)	minimum inspection frequency
All lancing operations	Monitoring of visible emissions at commencement of operation and every two hours during operation
Material handling operations	Inspect buttons for adequate cooling and moisture content prior to commencing any material handling operations; Monitoring of visible emissions every two hours during operation

The above-mentioned inspections shall be performed during representative, normal operating conditions.

- 2. 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.
- 3. OMS shall perform inspections of all lancing equipment prior to beginning any lancing operations. Operators shall, at a minimum, inspect the following:
  - a. Carbon dioxide and oxygen tank pressure gauges for proper operation and adequate tank pressure;
  - b. Carbon dioxide and oxygen tank weight/volume gauges for proper operation and adequate gas supply;
  - c. All hoses and lines for cracks, leaks or other damage;
  - d. All couplings and fittings for cracks, leaks, or other damage;
  - e. All valves for proper operation and flow.
- 4. OMS shall maintain records of the following information for button lancing and associated material handling operations:

Emissions Unit ID: F018

- a. The date and reason any inspection as required in C.1, above was not performed;
- b. The date of each inspection where it was determined that visible emissions indicated a malfunction of button lancing and/or material handling control measures;
- c. The date of each inspection where it was determined by the permittee that it was necessary to implement additional control measure(s) for either operation;
- d. The dates that the additional control measure(s) was (were) implemented;
- e. A description of the additional controls implemented;
- f. On a calendar quarter basis, the total number of days that additional control measure(s) was (were) implemented;

The information above shall be kept for button lancing and associated material handling operations.

5. OMS shall maintain the following records for the oxygen lancing operation:
  - a. The date that any inspection as required in C.3, above revealed damaged or incorrectly operating equipment or gauges, inadequate tank pressure, or inadequate gas supply;
  - b. Actions taken to correct the problem;
  - c. The date that equipment or replacement parts (if needed) for repairs were ordered;
  - d. The date that equipment or replacement parts (if needed) were installed.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation reports that detail any of the following occurrences:
  - a. Each day during which any inspection required by this permit was not performed by the required frequency and an explanation;
  - b. Each instance when an additional control measure, that was to be implemented as a result of an inspection, was not implemented and an explanation;
  - c. Each day that an inspection indicated malfunction of or damage to any control measure or equipment (including inadequate CO<sub>2</sub> supply). OMS shall also include a detailed description of the problem(s), reason(s) for the malfunction, and a description of corrective actions taken.
2. The 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 visible emission limitation of 20 per cent opacity as a three-minute average for button lancing operations shall be determined in accordance with USEPA Method 9 as

described in 40 CFR 60, Appendix A.

2. Compliance with the visible emission limitation of 10 per cent opacity as a six-minute average for button lancing material handling operations shall be determined in accordance with USEPA Method 9 as described in 40 CFR 60, Appendix A.
3. Compliance with the hourly emissions limitation of 2.80 lb PM/hr shall be determined through the following methods using the following emissions factors:

Oxygen lancing: An emission factor of 2.8 lb PM/ton metal lanced shall be used. CO<sub>2</sub> suppression reduces emissions by 90%. Controlled emission factor is 0.28 lb PM/ton metal lanced.

$$H = (0.28) (W)$$

where

H = hourly PM emissions, lb/hr  
W = hourly throughput, tons/hr

4. Compliance with the annual emissions limitation of 4.91 tons PM/yr shall be determined through the following methods using the following emissions factors:

Oxygen lancing: An emission factor of 2.8 lb PM/ton metal lanced shall be used. CO<sub>2</sub> suppression reduces emissions by 90%. Controlled emission factor is 0.28 lb PM/ton metal lanced.

$$A = (0.28) (W_a) / 2000$$

where

A = annual PM emissions, tons/yr  
W<sub>a</sub> = annual throughput, tons/yr

## F. Miscellaneous Requirements

None.