



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
50 West Town Street, Suite 700  
Columbus, OH 43215

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Mailing Address:

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

**CERTIFIED MAIL**

**RE: DRAFT PERMIT TO INSTALL MODIFICATION**

**CLARK COUNTY**

**Application No: 08-04739**

**Fac ID: 0812100588**

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

**DATE: 6/12/2007**

City Wide Towing and Auto Wrecking  
David Chapman  
930 Dayton Ave.  
Springfield, OH 45506-1711

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **\$ 0** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Permit Issuance and Data Management Section at (614) 644-3631.

Sincerely,

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

CC: USEPA RAPCA MIAMI VALLEY REG PLANNING COMMISSION IN

**CLARK COUNTY**

**PUBLIC NOTICE**  
**ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04739 FOR AN AIR CONTAMINANT SOURCE**  
**FOR City Wide Towing and Auto Wrecking**

On 6/12/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **City Wide Towing and Auto Wrecking**, located at **930 Dayton Ave., Springfield, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04739:

**administrative modification to lower used oil PCB content from 50 ppm to 2 ppm.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main, Dayton, OH 45422-1280  
[(937)225-4435]



**Permit To Install**

**Issue Date: To be entered upon final issuance**

**Terms and Conditions**

**Effective Date: To be entered upon final issuance**

**DRAFT MODIFICATION OF PERMIT TO INSTALL 08-04739**

Application Number: 08-04739

Facility ID: 0812100588

Permit Fee: **To be entered upon final issuance**

Name of Facility: City Wide Towing and Auto Wrecking

Person to Contact: David Chapman

Address: 930 Dayton Ave.  
Springfield, OH 45506-1711

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

**930 Dayton Ave.  
Springfield, Ohio**

Description of proposed emissions unit(s):

**administrative modification to lower used oil PCB content from 50 ppm to 2 ppm.**

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

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Chris Korleski  
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 (i.e., postmarked) quarterly 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**

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	0.14
Nitrogen Oxides	1.93



**2.b** The permittee is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production 40 CFR Part 63, Subpart RRR. promulgated March 23, 2000 and must comply with the provisions of the rule new as an area source.

**B. Operational Restrictions**

1. An afterburner for controlling emissions must be installed and used at all times during operation of the furnace. The after burner shall have a design residence time of 0.8 second or greater, and the average combustion temperature, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees Fahrenheit.
2. The furnace and afterburner shall be operated and maintained in accordance with the emissions unit's operation, maintenance and monitoring (OM&M) plan following the manufacturer's recommendations, instructions, and operating manuals.
3. The emissions unit can only operate with metallic charge, any nonmetallic charge shall not be loaded into the furnace. All metallic charge shall be free of ice, water, lead and magnesium.
4. This emissions unit shall burn on-specification used recycled oil, # 2 fuel oil and/or natural gas.
5. All used oil burned in this emissions unit shall be "on-specification" (on-spec) oil and must meet the used oil fuel specifications contained in OAC 3745-279-11, which restricts the used oil to the following limitations:

<u>Contaminant/Property</u>	<u>Allowable Specifications</u>
arsenic	5 ppm, maximum
cadmium	2 ppm, maximum
chromium	10 ppm, maximum
lead	100 ppm, maximum
total halogens	4,000 ppm maximum*
flash point	100°F, minimum;

The used oil burned in this emissions unit shall contain less than the quantifiable levels of PCBs as defined in 40 CFR 761.3; and shall also not exceed the following mercury limitation nor fall below the following heating value:

PCB's	less than 2 ppm
heat content	135,000 Btu/gallon, minimum
mercury	1 ppm, maximum

\* Used oil containing more than 1,000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under paragraph (B)(1) of rule 3745-

279-10 of the Administrative Code. The permittee may receive and burn used oil exceeding 1,000 ppm total halogens (but less than 4,000 ppm maximum) only if the permittee has demonstrated that the used oil does not contain any hazardous waste pursuant to OAC rule 3745-279-10(B).

The burning of used oil not meeting the above limitations is prohibited in this emissions unit. The management and burning of used oil is subject to the Standards for the Management of Used Oil, OAC Chapter 3745-279, and the permittee shall document and assure that used oils burned in this emissions unit meet all of the applicable requirements of this Chapter.

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

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature at the exit of the of the combustion zone for the afterburner, in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The monitoring system shall collect and record the average temperature for 15 minute block averages and determine the average temperature for each 3-hour block of time.

2. 40 CFR Part 63, Subpart RRR requires a calibration and certification of the afterburner temperature monitor be performed every six months. An alternative to performing the calibration and certification for every six months was approved by USEPA for this emissions unit. The alternative requires the procedures as outlined in the USEPA approval letter of February 17, 2006 be implemented in the operation, maintenance and monitoring plan for this emissions unit. These procedures include the following specifications for the continuous temperature monitor and recorder for measuring and recording the temperature at the exit of the of the combustion zone for the afterburner:
  - a. The permittee shall utilize three pieces of equipment: a data logger, a dual thermocouple and a digital readout. The data logger shall utilize a software program to allow the operator to arrange data in a spreadsheet file. A spool of very low impedance wire shall also be utilized as part of the package since the currents generated by the thermocouples may be very low.
  - b. Dual thermocouples shall be used so that the data logger and the digital read-out each has its own thermocouple. As a result, there will be sufficient current for the digital read-out and the data logger to read properly. Both thermocouples will read the same temperature and report to their own piece of equipment. As part of the standard operating procedure, a second set of thermocouples shall be kept on site to replace a malfunctioning unit immediately.

**City Wide Towing and Auto Wrecking**  
**PTI Application: 08-04739**  
**Issued: To be entered upon final issuance**

**Facility ID: 0812100588**  
**Emissions Unit ID: P001**

3. The permittee shall collect and record the following information each day when the emissions unit was in operation:
  - a. a log or record of the downtime for the afterburner or monitoring equipment when the associated emissions unit was in operation;
  - b. all 3-hour blocks of time during which the average combustion temperature of the afterburner was less than 1650 degrees Fahrenheit; and
  - c. the fuel used (i.e., used recycled oil, #2 fuel oil, or natural gas).
  
4. The permittee shall receive and maintain the chemical analyses from the supplier/marketer for each shipment of used oil burned in this emissions unit, which shall contain the following information:
  - a. the date the used oil was received at the facility;
  - b. the name, address, and U.S. EPA identification number (if applicable) of the generator, transporter, processor/re-finer, supplier, and/or marketer;
  - c. the results of the chemical analyses demonstrating the used oil meets the standards in OAC 3745-279-11, including:
    - i. arsenic content, in ppm;
    - ii. the cadmium content, in ppm;
    - iii. the chromium content, in ppm;
    - iv. the lead content, in ppm;
    - v. total halogens, in ppm; and
    - vi. the flash point
  - d. the analysis demonstrating that the used oil has a total halogen content below 1,000 ppm, or below 4,000 ppm with the demonstration for the rebuttal of the presumption that the oil is hazardous waste or has been mixed with hazardous waste, as described in OAC rule 3745-279-63 (B); and
  - e. the results of the analyses demonstrating that the used oil meets the heating value and mercury and PCB limitations contained in this permit.

Each analysis shall be kept in a readily accessible location for a period of not less than **5** years following the receipt of each shipment of used oil and shall be made available to the Ohio EPA Division of Hazardous Waste Management and/or the Division of Air Pollution Control (the appropriate Ohio EPA District Office or local air agency) upon verbal or written request. Any authorized representative of the Ohio EPA may sample or require sampling of any used oil shipments received, stored, or burned by/at this facility for periodic detailed chemical analyses, through an independent laboratory.

**City Wide Towing and Auto Wrecking**  
**PTI Application: 08-04739**  
**Issued: To be entered upon final issuance**

**Facility ID: 0812100588**  
**Emissions Unit ID: P001**

5. It is not necessary that the permittee perform chemical analysis specified in C.3 for used oil generated and collected on-site and burned in this emissions unit, so long as the oil consists of only automotive and truck oils.
6. The permittee shall implement the procedures outlined in the USEPA approval letter of February 17, 2006 in the operation, maintenance and monitoring plan for this emissions unit as an alternative to performing a calibration and certification of the afterburner temperature monitor every six months as specified by Subpart RRR.

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

1. The permittee shall submit quarterly deviations (excursion) reports that identify all periods of time during which the temperature of the smelting furnace afterburner was not maintained at or above the required temperature as specified in Section B.1 of this permit.
2. The permittee shall notify the Ohio EPA Division of Hazardous Waste Management and the Division of Air Pollution Control (the RAPCA), in writing and within 30 days, of burning any used oil exceeding the limitations found in OAC rule 3745-279-11 and/or any incident or occurrence of non-compliance with any other applicable requirement of OAC Chapter 3745-279; and shall also notify the Ohio EPA Division of Air Pollution Control, within the same amount of time, if any oil is/was burned which exceeds the mercury limitation of 1 ppm and/or is documented as having a heating value of less than 135,000 Btu/gallon.
3. The permittee shall submit quarterly summaries that include a log or record of the downtime for the afterburner and/or monitoring equipment when the associated emissions unit was in operation.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation -  
The PE shall not exceed 0.03 lb/hr.

##### **Applicable Compliance Method -**

Compliance shall be determined by adding the source manufacturers' supplied test data (0.023 lbs/hour while firing with natural gas) and the hourly emissions for waste oil combustion. The hourly emissions for combustion of waste oil is determined using the emission factor from Table 11.11-1 for atomizing burner, dated 10/96, multiplied by the maximum hourly fuel usage (24.44 gal/hour).

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation -  
The PE shall not exceed 0.14 TPY.

Applicable Compliance Method -

The annual PE limitation was determined by multiplying the hourly limitation by 8,760 hrs/yr, and then dividing by 2,000 lbs/ton. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

- c. Emission Limitation -  
The NOx emissions shall not exceed 1.93 TPY.

Applicable Compliance Method -

When firing with used recycled oil or #2 fuel oil, compliance shall be determined by multiplying the maximum annual fuel usage (241,133 gal/year) by the emission factor (16 lb-NOx/100 gal) from Table 11.11-1 for combustion of waste oil for atomizing burner, dated 10/96, and then dividing by 2,000 lbs/ton.

When firing with natural gas, compliance with this limitation will be assumed since the annual emissions determination using the source manufacturers' supplied test data (0.41 lb-NOx/hour while firing with natural gas) is less than the annual emissions determined above when firing with waste oil, and the difference is negligible.

- d. Emission Limitation-  
The visible PE shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method -

Compliance shall be determined by visible emissions evaluations performed in accordance with OAC rule 3475-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

**F. Miscellaneous Requirements**

None