



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: April 25, 2025 Effective Date: October 25, 2026
Revision Date: September 24, 2026 Expiration Date: April 25, 2027
Revision Type: Extension

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to construct, install, modify or reactivate the air emission source(s) more fully described in the site inventory list. This Facility is subject to all terms and conditions specified in this plan approval. Nothing in this plan approval relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each plan approval condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated as "State-Only" requirements.

Plan Approval No. 15-0163

Federal Tax Id - Plant Code: 20-8484120-3

Owner Information

Name: SIMS METAL EAST LLC
Mailing Address: 1000 S 1ST AVE
COATESVILLE, PA 19320-4039

Plant Information

Plant: SIMSMETAL EAST LLC/COATESVILLE FACILITY
Location: 15 Chester County 15949 South Coatesville Borough
SIC Code: 5093 Wholesale Trade - Scrap And Waste Materials

Responsible Official

Name: ANDREW HANNAN
Title: REGIONAL OPR MGR
Phone: (267) 798 - 2410 Email: andrew.hannan@simsmm.com

Plan Approval Contact Person

Name: MICHAEL TRUPIN
Title: DIR AIR & PER COMP PROG
Phone: (215) 478 - 1886 Email: michael.trupin@simsmm.com

[Signature] _____
JILLIAN A. GALLAGHER, SOUTHEAST REGION AIR PROGRAM MANAGER



Plan Approval Description

This plan approval is for the installation of the existing hammermill metal shredder operating at the metal recycling facility located at 1000 South First Avenue, Coatesville, PA.



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Note: These same sub-sections are repeated for each source!

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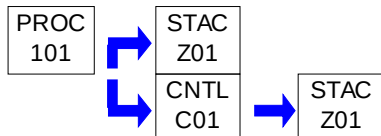
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**SECTION A. Plan Approval Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	HAMMERMILL METAL SHREDDER	N/A	
102	CONVEYORS AND STOCKPILES		
C01	WET SUPPRESSION SYSTEM	N/A	
Z01	FUGITIVE EMISSIONS (101)		

PERMIT MAPS

**SECTION B. General Plan Approval Requirements****#001 [25 Pa. Code § 121.1]****Definitions**

Words and terms that are not otherwise defined in this plan approval shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.12b (a) (b)]**Future Adoption of Requirements**

The issuance of this plan approval does not prevent the future adoption by the Department of any rules, regulations or standards, or the issuance of orders necessary to comply with the requirements of the Federal Clean Air Act or the Pennsylvania Air Pollution Control Act, or to achieve or maintain ambient air quality standards. The issuance of this plan approval shall not be construed to limit the Department's enforcement authority.

#003 [25 Pa. Code § 127.12b]**Plan Approval Temporary Operation**

This plan approval authorizes temporary operation of the source(s) covered by this plan approval provided the following conditions are met.

(a) When construction, installation, modification, or reactivation is being conducted, the permittee shall provide written notice to the Department of the completion of the activity approved by this plan approval and the permittee's intent to commence operation at least five (5) working days prior to the completion of said activity. The notice shall state when the activity will be completed and when the permittee expects to commence operation. When the activity involves multiple sources on different time schedules, notice is required for the commencement of operation of each source.

(b) Pursuant to 25 Pa. Code § 127.12b (d), temporary operation of the source(s) is authorized to facilitate the shakedown of sources and air cleaning devices, to permit operations pending the issuance of a permit under 25 Pa. Code Chapter 127, Subchapter F (relating to operating permits) or Subchapter G (relating to Title V operating permits) or to permit the evaluation of the air contaminant aspects of the source.

(c) This plan approval authorizes a temporary operation period not to exceed 180 days from the date of commencement of operation, provided the Department receives notice from the permittee pursuant to paragraph (a), above.

(d) The permittee may request an extension of the 180-day shakedown period if further evaluation of the air contamination aspects of the source(s) is necessary. The request for an extension shall be submitted, in writing, to the Department at least 30 days prior to the end of the initial 180-day shakedown period and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established. This temporary operation period will be valid for a limited time and may be extended for additional limited periods, each not to exceed 180 days.

(e) The notice submitted by the permittee pursuant to subpart (a) above, prior to the expiration of the plan approval, shall modify the plan approval expiration date on Page 1 of this plan approval. The new plan approval expiration date shall be 180 days from the date of commencement of operation.

#004 [25 Pa. Code § 127.12(a) (10)]**Content of Applications**

The permittee shall maintain and operate the sources and associated air cleaning devices in accordance with good engineering practice as described in the plan approval application submitted to the Department.

#005 [25 Pa. Code §§ 127.12(c) and (d) & 35 P.S. § 4013.2]**Public Records and Confidential Information**

(a) The records, reports or information obtained by the Department or referred to at public hearings shall be available to the public, except as provided in paragraph (b) of this condition.

(b) Upon cause shown by the permittee that the records, reports or information, or a particular portion thereof, but not emission data, to which the Department has access under the act, if made public, would divulge production or sales figures or methods, processes or production unique to that person or would otherwise tend to affect adversely the

**SECTION B. General Plan Approval Requirements**

competitive position of that person by revealing trade secrets, including intellectual property rights, the Department will consider the record, report or information, or particular portion thereof confidential in the administration of the act. The Department will implement this section consistent with sections 112(d) and 114(c) of the Clean Air Act (42 U.S.C.A. § 7412(d) and 7414(c)). Nothing in this section prevents disclosure of the report, record or information to Federal, State or local representatives as necessary for purposes of administration of Federal, State or local air pollution control laws, or when relevant in a proceeding under the act.

#006 [25 Pa. Code § 127.12b]**Plan Approval Terms and Conditions**

[Additional authority for this condition is derived from 25 Pa. Code Section 127.13]

(a) This plan approval will be valid for a limited time, as specified by the expiration date contained on Page 1 of this plan approval. Except as provided in § § 127.11a and 127.215 (relating to reactivation of sources; and reactivation), at the end of the time, if the construction, modification, reactivation or installation has not been completed, a new plan approval application or an extension of the previous approval will be required.

(b) If construction has commenced, but cannot be completed before the expiration of this plan approval, an extension of the plan approval must be obtained to continue construction. To allow adequate time for departmental action, a request for the extension shall be postmarked at least thirty (30) days prior to the expiration date. The request for an extension shall include the following:

- (i) A justification for the extension,
- (ii) A schedule for the completion of the construction

If construction has not commenced before the expiration of this plan approval, then a new plan approval application must be submitted and approval obtained before construction can commence.

(c) If the construction, modification or installation is not commenced within 18 months of the issuance of this plan approval or if there is more than an 18-month lapse in construction, modification or installation, a new plan approval application that meets the requirements of 25 Pa. Code Chapter 127, Subchapter B (related to plan approval requirements), Subchapter D (related to prevention of significant deterioration of air quality), and Subchapter E (related to new source review) shall be submitted. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

#007 [25 Pa. Code § 127.32]**Transfer of Plan Approvals**

(a) This plan approval may not be transferred from one person to another except when a change of ownership is demonstrated to the satisfaction of the Department and the Department approves the transfer of the plan approval in writing.

(b) Section 127.12a (relating to compliance review) applies to a request for transfer of a plan approval. A compliance review form shall accompany the request.

(c) This plan approval is valid only for the specific source and the specific location of the source as described in the application.

#008 [25 Pa. Code § 127.12(a)(4) & 35 P.S. § 4008 & § 114 of the CAA]**Inspection and Entry**

(a) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.

(b) The permittee shall also allow the Department to have access at reasonable times to said sources and associated air cleaning devices with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act and regulations adopted under the act.

**SECTION B. General Plan Approval Requirements**

(c) Nothing in this plan approval condition shall limit the ability of the Environmental Protection Agency to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

#009 [25 Pa. Code 127.13a]**Plan Approval Changes for Cause**

This plan approval may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

(a) The permittee constructs or operates the source subject to the plan approval in violation of the act, the Clean Air Act, the regulations promulgated under the act or the Clean Air Act, a plan approval or permit or in a manner that causes air pollution.

(b) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.

(c) The permittee fails to submit a report required by this plan approval.

(d) The Environmental Protection Agency determines that this plan approval is not in compliance with the Clean Air Act or the regulations thereunder.

#010 [25 Pa. Code §§ 121.9 & 127.216]**Circumvention**

(a) The permittee, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

(b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this plan approval, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#011 [25 Pa. Code § 127.12c]**Submissions**

Reports, test data, monitoring data, notifications shall be submitted to the:

Regional Air Program Manager

PA Department of Environmental Protection

(At the address given on the plan approval transmittal letter or otherwise notified)

#012 [25 Pa. Code § 127.12(a)(9) & 40 CFR Part 68]**Risk Management**

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).

(b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the facility. The permittee shall submit the RMP to the Environmental Protection Agency according to the following schedule and requirements:

(1) The permittee shall submit the first RMP to a central point specified by the Environmental Protection Agency no later than the latest of the following:

**SECTION B. General Plan Approval Requirements**

- (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
- (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

(2) The permittee shall submit any additional relevant information requested by the Department or the Environmental Protection Agency concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.

(c) As used in this plan approval condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

#013 [25 Pa. Code § 121.7]**Prohibition of Air Pollution**

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. §§ 4001-4015).

#014 [25 Pa. Code § 127.25]**Compliance Requirement**

A person may not cause or permit the operation of a source subject to § 127.11 (relating to plan approval requirements), unless the source and air cleaning devices identified in the application for the plan approval and the plan approval issued to the source, are operated and maintained in accordance with specifications in the application and conditions in the plan approval issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.

**SECTION C. Site Level Plan Approval Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §121.7]****Prohibition of air pollution.**

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. Section 4003).

002 [25 Pa. Code §123.1]**Prohibition of certain fugitive emissions**

No person may permit the emission into the outdoor atmosphere of a fugitive air contaminant from a source other than the following:

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- (4) Clearing of land.
- (5) Stockpiling of materials.
- (6) Open burning operations, as specified in 25 Pa. Code § 129.14.
- (7) N/A
- (8) N/A
- (9) Sources and classes of sources other than those identified in (1)-(8) above, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

- (i) The emissions are of minor significance with respect to causing air pollution; and
- (ii) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

003 [25 Pa. Code §123.2]**Fugitive particulate matter**

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1, if such emissions are visible at the point the emissions pass outside the person's property.

004 [25 Pa. Code §123.31]**Limitations**

A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

005 [25 Pa. Code §123.41]**Limitations**

A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

- (a) Equal to or greater than 20% for a period or periods aggregating more than three (3) minutes in any one (1) hour.
- (b) Equal to or greater than 60% at any time.

006 [25 Pa. Code §123.42]**Exceptions**

The opacity limitations of 25 Pa. Code § 123.41 shall not apply to a visible emission in any of the following instances:

- (a) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (c) When the emission results from sources specified in 25 Pa. Code § 123.1 (relating to prohibition of certain fugitive emissions).

**SECTION C. Site Level Plan Approval Requirements****# 007 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall limit facility-wide VOC emissions to less than 25 tons per year, based on a 12-month rolling sum.

Facility-wide emissions include emissions from the sources listed in this plan approval, including any miscellaneous sources exempt from plan approval requirements which are listed in Section H of this plan approval.

008 [25 Pa. Code §129.14]**Open burning operations**

No person may permit the open burning of material in the Southeast Air Basin except when the open burning operations result from:

- (a) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
- (b) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (c) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (d) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.
- (e) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of the structure.
- (f) A fire set solely for recreational or ceremonial purposes.
- (g) A fire set solely for cooking food.

II. TESTING REQUIREMENTS.**# 009 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) If at any time the Department has cause to believe that air contaminant emissions from any source may be in excess of the limitations specified in this Plan Approval, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).

(b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139, the most current version of the DEP Source Testing Manual, and the EPA Clean Air Act National Stack Testing Guidance, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

III. MONITORING REQUIREMENTS.**# 010 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

- (a) A device approved by DEP and maintained to provide accurate opacity measurements.
- (b) Observers trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by DEP.

011 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

(a) The permittee shall monitor the facility, each operating day, for the following:

- (1) odors which may be objectionable (as per 25 Pa. Code §123.31);
- (2) visible emissions (as per 25 Pa. Code §§ 123.41 and 123.42); and
- (3) fugitive particulate matter (as per 25 Pa. Code §§ 123.1 and 123.2).

(b) Monitoring shall be performed as follows:

**SECTION C. Site Level Plan Approval Requirements**

- (1) once during daylight hours when deliveries are being made, piles are being moved, or trucks are being loaded;
- (2) once during hammermill operating hours; and
- (3) monitoring shall include a visual observation.

(c) The monitoring requirements found in (b)(1) and (b)(2), above, may be performed once per day when the events occur simultaneously.

(d) Objectionable odors, fugitive particulate matter; or visible emissions that are caused by or may be caused by operations at the site shall:

- (1) be investigated;
- (2) be reported to the individual(s) designated by the permittee;
- (3) have appropriate corrective action taken (for emissions that originate on-site); and
- (4) be recorded in a permanent written log.

(e) The Department reserves the right to change the above monitoring requirements at any time, based on, but not limited to: complaints, monitoring results, and/or Department findings. Changes to the above monitoring frequency will be accomplished through a permit revision.

IV. RECORDKEEPING REQUIREMENTS.**# 012 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall maintain a record of all monitoring of fugitive emissions, visible emissions and odors, including those that deviate from the conditions found in this permit. The record of deviations shall contain, at a minimum, the following items:

- (a) Date, time, and location of the incident(s).
- (b) The cause of the event.
- (c) The corrective action taken, if necessary, to abate the situation and prevent future occurrences.

013 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall maintain records of all the facility's increases of emissions from the following categories:

- (a) De minimis increases without notification to the Department.
- (b) De minimis increases with notification to the Department, via letter.
- (c) Increases resulting from a Request for Determination (RFD) to the Department.
- (d) Increases resulting from the issuance of a plan approval and subsequent operating permit.

014 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall maintain monthly records of facility-wide VOC emissions, including 12-month rolling sums.

Facility-wide emissions include emissions from the sources listed in this plan approval and any miscellaneous source exempt from plan approval requirements which are listed in Section H of this plan approval.

V. REPORTING REQUIREMENTS.**# 015 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department at 484-250-5920. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

**SECTION C. Site Level Plan Approval Requirements**

(b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.

(c) The report shall describe the following:

- (1) Name, permit or authorization number, and location of the facility;
- (2) Nature and cause of the malfunction, emergency or incident;
- (3) Date and time when the malfunction, emergency or incident was first observed;
- (4) Expected duration of excess emissions;
- (5) Estimated rate of emissions; and
- (6) Corrective actions or preventative measures taken.

(d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or by e-mail within five (5) business days of discovery. The report shall contain the same information required by paragraph (c), and any permit specific malfunction reporting requirements.

(e) During an emergency an owner or operator may continue to operate the source at their discretion provided they submit justification for continued operation of a source during the emergency and follow all the notification and reporting requirements in accordance with paragraphs (b)-(d), as applicable, including any permit specific malfunction reporting requirements.

(f) Reports regarding malfunctions, emergencies or incidents of excess emissions shall be submitted to the appropriate DEP Regional Office Air Program Manager.

(g) Any emissions resulted from malfunction or emergency are to be reported in the annual emissions inventory report, if the annual emissions inventory report is required by permit or authorization.

VI. WORK PRACTICE REQUIREMENTS.**# 016 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

A person responsible for any source specified in 25 Pa. Code § 123.1 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

- (a) Use, where possible, of water or suitable chemicals, for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land;
- (b) Application of asphalt, water, or other suitable chemicals, on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts;
- (c) Paving and maintenance of roadways; and
- (d) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or by other means.

017 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall immediately, upon discovery, implement measures which may include the application for the installation of air cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) identified in this plan approval is causing the emission of air contaminants in excess of the limitations specified in, or established pursuant to 25 Pa. Code Article III or any other applicable rule promulgated under the Clean Air Act.

**SECTION C. Site Level Plan Approval Requirements****# 018 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall ensure that all sources are operated and maintained in accordance with the facility's standard operating and maintenance procedures and good engineering and air pollution control practices.

019 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The sources listed in this plan approval shall be installed and operated in accordance with the plans submitted with the plan approval application (as approved herein).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this plan approval including Section B (relating to Plan Approval General Requirements).

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

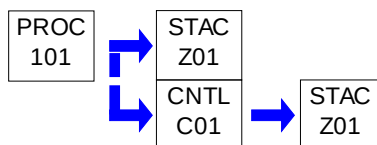
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 101

Source Name: HAMMERMILL METAL SHREDDER

Source Capacity/Throughput:

N/A

**I. RESTRICTIONS.****Throughput Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) Until such time that DEP approves the use of an alternative VOC emission factor (as specified below within this condition), the permittee shall limit the total amount of material processed through the hammermill metal shredder to 200,000 gross tons of material per year, based on a 12-month rolling sum. The first month of the rolling sum is the first full month following issuance of this plan approval.

(b) The permittee shall, immediately upon notification from DEP that an alternative VOC emission factor applies, limit the material throughput (including gross tons per year and maximum monthly average % ELV) to an amount which limits VOC emissions from the hammermill metal shredder to less than 25 tpy.

(c) The permittee may choose, at any time, to limit the material throughput (including gross tons per year and maximum monthly average % ELV) to an amount which limits the VOC emissions from the hammermill metal shredder to less than 25 tpy based on a VOC emission factor that has been approved for use by EPA.

[The first month of the annual material throughput and alternate VOC emission factor begins following the date of notification from DEP.]

[DEP reserves the right to modify the annual amount of material throughput and to include a maximum average monthly % ELV, based on data collected (e.g. a VOC emission factor) during a compliant and DEP-approved source test conducted at the Simsmetal Fairless location. The permittee may present an alternate emission factor or emission reduction strategy to the Department for consideration and approval.]

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.**# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) The permittee shall calculate uncontrolled VOC emissions from this source on a monthly and 12-month rolling basis, based on the amount of material processed per month (gross tons per month) and a temporary VOC emission factor (lb VOC/gross ton material) of 0.243 lb VOC/gross ton feed material.

(b) Immediately following notification from DEP that an alternative VOC emission factor applies, the permittee shall begin calculating VOC emissions from this source using the revised VOC emission factor.

[The first month of the annual material throughput and alternate VOC emission factor begins following the date of notification from DEP.]

**SECTION D. Source Level Plan Approval Requirements****# 003 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- (a) The permittee shall monitor the amount of material processed (gross tons) in the Hammermill Metal Shredder and Undermill Oscillator on a monthly basis.
- (b) The permittee shall monitor the stream split or percent ELV for all material processed in the Hammermill Metal Shredder and Undermill Oscillator on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.**# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- (a) The permittee shall maintain records of the amount of material processed (gross tons) in the Hammermill Metal Shredder and Undermill Oscillator on a monthly and 12-month rolling basis.
- (b) The permittee shall maintain records of the average stream split or percent ELV for all material processed in the Hammermill Metal Shredder and Undermill Oscillator on a monthly basis.

005 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall maintain records of total VOC emissions from the Hammermill Metal Shredder and Undermill Oscillator on a monthly and 12-month rolling basis. The first month of the rolling sum is the first full month following issuance of this plan approval.

006 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

- (a) The permittee shall record each inspection of the wet suppression system, including the date of each inspection and any corrective actions taken.
- (b) The permittee shall specify in the inspection entry the control mechanism being used if the permittee ceases operation of the wet suppression system.

007 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall maintain records of all actions taken as part of the depollution program for each shipment of inbound material received, including:

- (a) inbound material acceptance and inspection program
- (b) certifications from suppliers indicating depollution completed
- (c) depollution steps such as draining or removing fluids
- (d) inspection confirming fluids have been removed.

V. REPORTING REQUIREMENTS.**# 008 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- (a) Within five (5) business days after the notification from DEP that an alternative VOC emission factor applies, the permittee shall submit to DEP the revised VOC emission factor, the revised material throughput restrictions (including gross tons per year and maximum monthly average % ELV), and any supporting calculations.
- (b) If the permittee decides to use EPA's VOC emission factor equation, within five (5) business days, the permittee shall notify DEP and submit to DEP the revised VOC emission factor, the revised material throughput restrictions (including gross tons per year and maximum monthly average % ELV), and any supporting calculations.

**SECTION D. Source Level Plan Approval Requirements****VI. WORK PRACTICE REQUIREMENTS.****# 009 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- (a) The permittee shall operate the wet suppression system on any and all occasions that the Hammermill Metal Shredder and/or Undermill Oscillator are in operation.
- (b) The permittee shall reduce fugitive particulate matter from conveyors and stockpiling activities through the use of wet suppression equipment located at the Hammermill Metal Shredder resulting in higher moisture content downstream of the hammermill metal shredder at the conveyors and stockpiles.

010 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall drain and remove, to the extent practicable, VOC and HAP containing fluids from vehicles, appliances, industrial machinery, and other metal scrap received by the permittee prior to shredding; or the permittee shall perform an inspection to confirm the removal of VOC and HAP containing fluids. Fluids shall include, but are not limited to, gasoline, motor oil, antifreeze, transmission oil, and hydraulic fluid.

011 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall implement a depollution program for all infeed material to include at a minimum:

- (a) Depollution of whole, unflattened ELV (this requirement is included, should the facility decide to implement onsite depollution activities in the future)
- (b) Inbound material acceptance and inspection program
- (c) Require suppliers to certify that ELV are drained of fluids (e.g., gasoline, motor oil, refrigerants, etc.).

012 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

- (a) The permittee shall perform monthly periodic inspections to check that water is flowing to discharge spray nozzles in the wet suppression system.
- (b) The permittee shall initiate corrective action within 24 hours and complete corrective action as expediently as practical if the permittee finds that water is not flowing properly during an inspection of the water spray nozzles.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 102

Source Name: CONVEYORS AND STOCKPILES

Source Capacity/Throughput:

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**SECTION D. Source Level Plan Approval Requirements**

Source ID: C01

Source Name: WET SUPPRESSION SYSTEM

Source Capacity/Throughput:

N/A

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).



SECTION E. Source Group Plan Approval Restrictions.

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Plan Approval facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description
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Site Emission Restriction Summary

Emission Limit		Pollutant
24.900 Tons/Yr	based on a 12-month rolling sum	VOC

**SECTION H. Miscellaneous.**

The Department has determined that the emissions from the following activities, excluding those indicated as site level requirements, in Section C, of this permit, do not require additional limitations, monitoring, or recordkeeping:

- (a) Two (2) 0.325 MMBtu/hr used oil-fired space heaters
- (b) Five (5) 50,000 Btu/hr portable kerosene space heaters
- (c) One (1) 66,000 Btu/hr propane space heater
- (d) Diesel emergency generator, rated at 40 kW (56 HP)
- (e) Propane-fired hot water heater, rated at 38,000 Btu/hr
- (f) Three (3) non-emergency internal combustion engines used to power welding operations, power washing, and light stand.



***** End of Report *****
