



**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM**

TITLE V/STATE OPERATING PERMIT

Issue Date: March 13, 2025

Effective Date: March 13, 2025

Expiration Date: March 12, 2030

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 operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit 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 permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

TITLE V Permit No: 09-00187

Federal Tax Id - Plant Code: 20-8484120-1

Owner Information

Name: SIMS METAL EAST LLC
Mailing Address: 300 STEEL RD S
MORRISVILLE, PA 19067-3614

Plant Information

Plant: SIMSMETAL EAST LLC/MORRISVILLE
Location: 09 Bucks County 09002 Falls Township
SIC Code: 5093 Wholesale Trade - Scrap And Waste Materials

Responsible Official

Name: ANDREW HANNAN
Title: OPERATIONS MANAGER
Phone: (267) 798 - 2410 Email: andrew.hannan@simsmm.com

Permit Contact Person

Name: MICHAEL TRUPIN
Title: DIR OF AIR PROGRAMS
Phone: (215) 478 - 1886 Email: michael.trupin@simsmm.com

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



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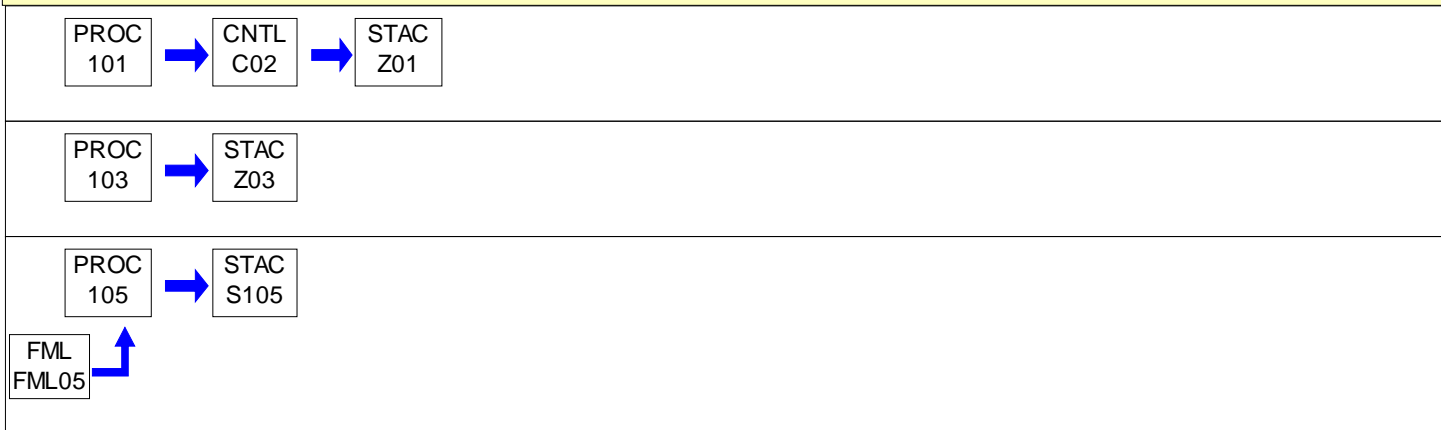
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SECTION A. Site Inventory List

| Source ID | Source Name | Capacity/Throughput | Fuel/Material |
|-----------|--|---------------------|---------------|
| 101 | HAMMERMILL METAL SHREDDER AND UNDERMILL OSCILLATOR | 400.000 Tons/HR | METAL |
| 103 | CONVEYORS & STOCKPILES | | |
| 105 | EMERGENCY ENGINE | | |
| C02 | WET SUPPRESSION SYSTEM | | |
| FML05 | DIESEL FUEL | | |
| S105 | ENGINE STACK | | |
| Z01 | HAMMERMILL FUGITIVES | | |
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PERMIT MAPS



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

Words and terms that are not otherwise defined in this permit 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 § 121.7]**Prohibition of Air Pollution**

No person may permit air pollution as that term is defined in the act.

#003 [25 Pa. Code § 127.512(c)(4)]**Property Rights**

This permit does not convey property rights of any sort, or any exclusive privileges.

#004 [25 Pa. Code § 127.446(a) and (c)]**Permit Expiration**

This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

#005 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e), 127.503 & 127.704(b)]**Permit Renewal**

(a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.

(b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.

(c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).

(d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also promptly provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

#006 [25 Pa. Code §§ 127.450(a)(4) & 127.464(a)]**Transfer of Ownership or Operational Control**

(a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:

- (1) The Department determines that no other change in the permit is necessary;
- (2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and,
- (3) A compliance review form has been submitted to the Department and the permit transfer has been approved by

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the Department.

(b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.

#007 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]**Inspection and Entry**

(a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department to perform the following:

- (1) Enter at reasonable times upon the permittee's premises where a Title V source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
- (2) Have access to and copy or remove, at reasonable times, records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

(b) 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.

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

#008 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]**Compliance Requirements**

(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:

- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application

(b) A person may not cause or permit the operation of a source, which is subject to 25 Pa. Code Article III, unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this Title V permit.

#009 [25 Pa. Code § 127.512(c)(2)]**Need to Halt or Reduce Activity Not a Defense**

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**SECTION B. General Title V Requirements****#010 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]****Duty to Provide Information**

(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.

(b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

#011 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]**Reopening and Revising the Title V Permit for Cause**

(a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay a permit condition.

(b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:

(1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.

(2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.

(3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.

(4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.

(d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

#012 [25 Pa. Code § 127.543]**Reopening a Title V Permit for Cause by EPA**

As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.

#013 [25 Pa. Code § 127.522(a)]**Operating Permit Application Review by the EPA**

The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of title V permit applications to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

**SECTION B. General Title V Requirements****#014 [25 Pa. Code § 127.541]****Significant Operating Permit Modifications**

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA Code §127.522(a), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#015 [25 Pa. Code §§ 121.1 & 127.462]**Minor Operating Permit Modifications**

The permittee may make minor operating permit modifications (as defined in 25 Pa. Code §121.1), on an expedited basis, in accordance with 25 Pa. Code §127.462 (relating to minor operating permit modifications). Notifications to EPA, pursuant to 25 PA Code §127.462(c), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#016 [25 Pa. Code § 127.450]**Administrative Operating Permit Amendments**

(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code §127.450(a). Copies of request for administrative permit amendment to EPA, pursuant to 25 PA Code §127.450(c)(1), if required, shall be submitted to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

(b) Upon final action by the Department granting a request for an administrative operating permit amendment covered under §127.450(a)(5), the permit shield provisions in 25 Pa. Code § 127.516 (relating to permit shield) shall apply to administrative permit amendments incorporated in this Title V Permit in accordance with §127.450(c), unless precluded by the Clean Air Act or the regulations thereunder.

#017 [25 Pa. Code § 127.512(b)]**Severability Clause**

The provisions of this permit are severable, and if any provision of this permit is determined by the Environmental Hearing Board or a court of competent jurisdiction, or US EPA to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

#018 [25 Pa. Code §§ 127.704, 127.705 & 127.707]**Fee Payment**

(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees). The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

(b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.

(c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.

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(d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).

(e) The permittee shall pay an annual operating permit maintenance fee according to the following fee schedule established in 25 Pa. Code § 127.704(d) on or before December 31 of each year for the next calendar year.

- (1) Eight thousand dollars (\$8,000) for calendar years 2021—2025.
- (2) Ten thousand dollars (\$10,000) for calendar years 2026—2030.
- (3) Twelve thousand five hundred dollars (\$12,500) for the calendar years beginning with 2031.

#019 [25 Pa. Code §§ 127.14(b) & 127.449]**Authorization for De Minimis Emission Increases**

(a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. The written notice shall:

- (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

The Department may disapprove or condition de minimis emission increases at any time.

(b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:

- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NO_x from a single source during the term of the permit and 5 tons of NO_x at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM₁₀ from a single source during the term of the permit and 3.0 tons of PM₁₀ at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.

(c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:

- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
- (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

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(3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

(4) Space heaters which heat by direct heat transfer.

(5) Laboratory equipment used exclusively for chemical or physical analysis.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.

(e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to the changes made under 25 Pa. Code § 127.449 (relating to de minimis emission increases).

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#020 [25 Pa. Code §§ 127.11a & 127.215]**Reactivation of Sources**

(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.

(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#021 [25 Pa. Code §§ 121.9 & 127.216]**Circumvention**

(a) The owner of this Title V facility, 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

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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 permit, 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.

#022 [25 Pa. Code §§ 127.402(d) & 127.513(1)]**Submissions**

(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager
PA Department of Environmental Protection
(At the address given on the permit transmittal letter, or otherwise notified)

(b) Any report or notification for the EPA Administrator or EPA Region III should be addressed to:

Enforcement & Compliance Assurance Division
Air, RCRA and Toxics Branch (3ED21)
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2852

The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

#023 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]**Sampling, Testing and Monitoring Procedures**

(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

#024 [25 Pa. Code §§ 127.511 & Chapter 135]**Recordkeeping Requirements**

(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:

- (1) The date, place (as defined in the permit) and time of sampling or measurements.
- (2) The dates the analyses were performed.
- (3) The company or entity that performed the analyses.
- (4) The analytical techniques or methods used.

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(5) The results of the analyses.

(6) The operating conditions as existing at the time of sampling or measurement.

(b) The permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.

(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#025 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]**Reporting Requirements**

(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.

(c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #022(c) of this permit.

(d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#026 [25 Pa. Code § 127.513]**Compliance Certification**

(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:

- (1) The identification of each term or condition of the permit that is the basis of the certification.
- (2) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.

(b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department in accordance with the submission requirements specified in Section B, Condition #022 of this permit. The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.

**SECTION B. General Title V Requirements****#027 [25 Pa. Code § 127.3]****Operational Flexibility**

The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)
- (6) Section 127.462 (relating to minor operating permit amendments)
- (7) Subchapter H (relating to general plan approvals and operating permits)

#028 [25 Pa. Code §§ 127.441(d), 127.512(i) and 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 Title V facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:

- (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
 - (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 EPA 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 permit 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.

(d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:

- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
- (2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.

**SECTION B. General Title V Requirements**

(e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.

(f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:

(1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

(2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Section B, Condition #026 of this permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#029 [25 Pa. Code § 127.512(e)]**Approved Economic Incentives and Emission Trading Programs**

No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.

#030 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]**Permit Shield**

(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:

(1) The applicable requirements are included and are specifically identified in this permit.

(2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.

(b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.

(2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.

(4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.

(c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department incorporating a significant permit modification in this Title V Permit shall be covered by the permit shield at the time that the permit containing the significant modification is issued.

#031 [25 Pa. Code §135.3]**Reporting**

(a) The permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.

(b) A source owner or operator may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

#032 [25 Pa. Code §135.4]**Report Format**

Emissions reports shall contain sufficient information to enable the Department to complete its emission inventory. Emissions reports shall be made by the source owner or operator in a format specified by the Department.

**SECTION C. Site Level Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

No person may permit the emission into the outdoor atmosphere of 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) and (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.

002 [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.

003 [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.

004 [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 minutes in any 1 hour; or
- (b) equal to or greater than 60% at any time.

005 [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).

006 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

- (a) The permittee shall limit facility-wide VOC emissions to less than 50 tons per year, based on a 12-month rolling sum.
- (b) Facility-wide emissions include emissions from sources listed in Section A of the permit as well as miscellaneous sources exempt from plan approval requirements which are listed in Section H of the permit.

**SECTION C. Site Level Requirements****# 007 [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.**# 008 [25 Pa. Code §127.441]****Operating permit 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 Permit/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.**# 009 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

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

010 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this condition is also derived from 25 Pa. Code § 127.511.]

(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:

- (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

**SECTION C. Site Level Requirements**

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: the review of the compliance certification and the semi-annual report of monitoring and recordkeeping, complaints, monitoring results, change in operating time (night operations), and/or Department findings. Changes to the above monitoring frequency will be accomplished through a permit revision.

IV. RECORDKEEPING REQUIREMENTS.**# 011 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this condition is also derived from 25 Pa. Code § 127.511.]

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) Description of the activity or operation occurring during the observation such as deliveries, moving piles, loading trucks, or operating hammermill, etc. If separate monitoring events are required during the operating day, include two separate entries.
- (c) The cause of the event.
- (d) The corrective action taken, if necessary, to abate the situation and prevent future occurrences.

012 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this condition is also derived from 25 Pa. Code § 127.511.]

The permittee shall retain training records, including dates, instructor, topic(s), and attendees names, for a minimum of five (5) years.

013 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this condition is also derived from 25 Pa. Code § 127.511.]

The permittee shall retain records of all monitoring reports, certifications, and work practice standards (including sweeping and water spray) on-site for a minimum of five (5) years.

014 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this condition is also derived from 25 Pa. Code § 127.511.]

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

- (a) Emissions increase of minor significance 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; and
- (d) Increases resulting from the issuance of a plan approval and subsequent operating permit.

**SECTION C. Site Level Requirements****# 015 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain monthly records of facility-wide VOC emissions, including 12-month rolling sums. Records shall include emissions from sources listed in Section A of the permit as well as miscellaneous sources exempt from plan approval requirements which are listed in Section H of the permit.

V. REPORTING REQUIREMENTS.**# 016 [25 Pa. Code §127.441]****Operating permit 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.

(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.

017 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.511(c)(1)-(2) and 127.513(5)(i)-(v).]

The permittee shall submit the following reports:

- (a) An annual certificate of compliance, due by April 1st of each year, for the period covering January 1 through December

**SECTION C. Site Level Requirements**

31 of the previous year. This certificate of compliance shall document compliance with all permit terms and conditions set forth in this Title V Permit as required under 25 Pa. Code § 127.513. The annual certificate of compliance shall be submitted to DEP electronically, and to EPA Region III in electronic form at the following email address: R3_APD_Permits@epa.gov. The subject line shall read: "TVOP No. 09-00187 Simsmetal East LLC/Morrisville"

(b) A semi-annual deviation report to DEP by October 1 of each year, for the period covering January 1–June 30, of the same year. [Note: The annual certificate of compliance in (a), above, fulfills the obligation for the second deviation reporting period (i.e., July 1–December 31, of the previous year).]

VI. WORK PRACTICE REQUIREMENTS.**# 018 [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.

019 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this condition is also derived from 25 Pa. Code § 127.512.]

The permittee may not modify any air contaminant system identified in this permit, prior to obtaining Department approval, except those modifications authorized by Condition #019(g), of Section B, of this permit.

020 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this condition is also derived from 25 Pa. Code § 127.512.]

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 operating permit 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.

021 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this condition is also derived from 25 Pa. Code § 127.512.]

The permittee shall implement the following dust control plan for the facility:

- (a) Have a readily available brush sweeping vehicle and water truck to control potential dust emissions. In the event of mechanical equipment problems, manual sweeping and wetting may be used;
- (b) Take all reasonable steps to eliminate the accumulation of debris and/or dust on the paved areas;
- (c) Sweep and wet the exit roadway from the facility and street area at the exit of the facility as needed (including all unpaved roadways) no less than twice per operating day except when the weather does not require reasonable actions to control

**SECTION C. Site Level Requirements**

roadway dust; and

(d) Conduct a visual inspection daily for fugitive dust from the in-feed conveyor or feed chute, shredder, separator, and storage piles.

022 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

A highly visible notice shall be posted at a prominent location at the facility stating; "All laden trucks shall be tarped before exiting the property" to prevent particulate matter from becoming airborne.

023 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) The permittee shall be responsible for trucks that are owned or operated by the permittee, or any companies affiliated with the permittee, to adequately tarp all loads exiting the facility property so as to prevent fugitive particulate matter from becoming airborne.

(b) The permittee shall notify, in writing, the truck owners and operators which haul loads from the facility of their responsibility to tarp each loaded truck. This written notice shall be sent to all haulers with existing accounts and to new accounts within 30 days of establishing accounts. A written notice shall also be provided to all other truck owners and operators who do not establish accounts with the permittee at least during their first use at the facility.

(c) The permittee shall certify in writing to the Department its compliance with these notification procedures.

024 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall ensure that the source(s) and air pollution control device(s), listed in this permit are operated and maintained in a manner consistent with good operating and maintenance practices, and in accordance with manufacturer's specifications (where applicable).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

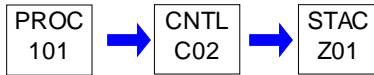
***** Permit Shield In Effect *****

**SECTION D. Source Level Requirements**

Source ID: 101

Source Name: HAMMERMILL METAL SHREDDER AND UNDERMILL OSCILLATOR

Source Capacity/Throughput: 400.000 Tons/HR METAL

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall limit the total VOC emissions from this source to less than 25 tons per year, based on a 12-month rolling sum.

Throughput Restriction(s).**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The following restricted items shall not be processed through the hammermill:

- (1) Incinerator waste, not to include recovered scrap metal;
- (2) Tires;
- (3) Containers (including 55 gallon drums) with unknown liquids or residues;
- (4) Radioactive materials;
- (5) CFC/HCFC containing scrap unless the refrigerant has been removed and properly disposed of;
- (6) Mercury containing devices;
- (7) All free flowing liquids shall be removed from the scrap prior to loading into the shredder. This includes, but is not limited to: oil, gasoline, fuels, antifreeze, transmission, gear oils, etc.;
- (8) Explosives;
- (9) Pressurized or closed containers, which shall include, but not be limited to: propane tanks, gas cylinders, gasoline tanks, uncut bulk storage tanks.
- (10) Poisons, infectious materials, or chemicals in any form (including, but not limited to: medical scrap and fertilizers;
- (11) Corrosive materials, except batteries when segregated and purchased separately; and
- (12) Scrap that contains hazardous waste.

(b) For the purpose of this condition, free flowing liquids are defined as liquids that can be drained through an opening and are still flowing in a single stream (i.e. have not begun to drip yet).

(c) Prompt removal and segregation for off-site disposal of any material listed above shall occur should it be detected during the permittee's inspection procedures.

003 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) Until such time that DEP approves the use of an alternative VOC emission factor, the permittee shall limit the total amount of material processed through the hammermill metal shredder to 229,000 net tons of material per year, based on a 12-month rolling sum.

(b) The permittee shall, immediately upon notification from DEP that an alternative VOC emission factor applies, limit the material throughput (including net 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 net 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. If the permittee chooses to limit the annual material throughput using an EPA-approved VOC emission factor, the permittee will not be required to conduct a source

**SECTION D. Source Level Requirements**

test in accordance with Condition #005.

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

II. TESTING REQUIREMENTS.**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The following condition applies to the initial source test and the temporary daily monitoring of VOCs continuously conducted at the Hammermill Metal Shredder and the Undermill Oscillator:

(a) The permittee shall email all source test and monitoring submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (email addresses are provided below). Any questions or concerns about source testing or monitoring submissions can be sent to RA-EPstacktesting@pa.gov and the PSIMS Administrator will address them.

Southeast Region
RA-EPSEstacktesting@pa.gov

Central Office
RA-EPstacktesting@pa.gov

(b) The following pertinent information shall be listed on the title page.

(1) Test Date(s)

- (i) For protocols, provide the proposed date on which testing will commence or "TBD"
- (ii) For reports, provide the first and last day of testing

(2) Facility Identification Number (Facility - ID): For test programs that were conducted under a multi-site protocol, also include the PF ID under which the protocol was stored in PSIMS, as indicated in the protocol response letter.

(3) Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but "Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment.

(4) Testing Requirements (all that apply):

- (i) Operating permit number
- (ii) Special purpose (i.e. Consent Order)

(c) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL".

005 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) In accordance with DEP Rules and Regulations set forth in 25 Pa. Code Chapter 139, the permittee shall conduct a source test by July 31, 2025, or thirty (30) calendar days following the completion of construction/installation of the total enclosure, whichever is later, in order to determine VOC and PM emissions from the Hammermill Metal Shredder and Undermill Oscillator.

(b) By September 30, 2024, the permittee shall submit to DEP for approval a source test protocol. The source test protocol submittal shall also contain detailed plans to conduct the daily monitoring of VOC emissions continuously for a minimum of 200 operating hours. The protocol shall contain the following information, at a minimum:

**SECTION D. Source Level Requirements**

- (1) a sketch of the source and the total enclosure with dimensions indicating the location of sampling ports for testing and monitoring,
- (2) data and information to ensure the collection of representative samples,
- (3) sufficient data to ensure total enclosure criteria of Method 204 are being met,
- (4) all test methods to be used during testing,
- (5) all monitoring and recordkeeping to be conducted during testing and monitoring,
- (6) the procedures and equipment specifications for the daily monitoring of VOC emissions continuously,
- (7) the method to determine mass per hour from the concentration results collected during testing and the daily monitoring of VOC emissions continuously.

[On September 30, 2024, the permittee submitted a stack test protocol to DEP for review and approval.]

(c) The permittee shall design and construct a total enclosure that meets the total enclosure criteria of Test Method 204. The enclosure shall include the hammermill inlet or the inlet to the loading bin and the outlet of the undermill oscillator.

(d) The source test shall be conducted while the Hammermill Metal Shredder is operating at maximum normal operating conditions (within 10% of the 400 ton per hour capacity), including a minimum of 60% ELV, or under such other conditions within the capacity of the equipment as may be requested by the DEP, representing maximum emissions. The permittee shall conduct the source test in accordance with the provisions of the current version of the DEP Source Testing Manual and the EPA Clean Air Act National Stack Testing Guidance. Refer to PADEP Source Testing Program website online for further information related to source testing including Source Testing FAQ and the PADEP Source Testing Manual.

(e) Information obtained during the source test, including but not limited to the air flow, shall be used to verify total enclosure for the affected source(s) using EPA Test Method 204. If at any time during the test, the enclosure fails to meet the total enclosure criteria of Method 204, the permittee shall measure the capture efficiency of each hood or enclosure separately using DEP-approved procedures and/or EPA Test Methods, as applicable. Following testing and monitoring, the enclosure may be removed and stored for future use.

(f) The source test shall be conducted at the stack associated with the emission capture system to measure and determine total VOC emissions in pounds per hour, total PM emissions in pounds per hour, and filterable PM in grains per dry standard cubic foot.

(g) The source test shall be conducted to determine a VOC emission factor in pounds of VOC per net ton of material processed, and a PM emission factor in pounds of PM per net ton of material processed, based on material throughput achieved during testing.

(1) The permittee shall conduct at least three 1-hour runs while processing a minimum of 60% ELV in order to determine maximum potential VOC emissions.

(2) The permittee may conduct an additional three 1-hour runs in order to determine a VOC emission factor while processing material other than end of life vehicles (zero % ELV).

(h) The source test may be used to establish minimum and/or maximum operating parameter values, or an operating parameter range for each parameter to be monitored that ensures compliance with the facility-wide VOC minor source emission limit. DEP reserves the right to include or modify operating parameters (i.e. amount of material throughput including %ELV), monitoring and recordkeeping, or inspection parameters depending on data collected during a compliant and DEP-approved source test.

(i) The permittee shall monitor and record the following parameters during testing:

- (1) amount of material processed in net tons per hour,
- (2) stream split (or percent ELV),
- (3) fan speed setting of the emissions capture and control system, and any changes made to the fan speed setting during the test,
- (4) pressure differential of the enclosure (continuously).

**SECTION D. Source Level Requirements**

(j) At least thirty (30) days prior to the source test, the Regional Air Quality Manager, shall be informed of the date and time of the test.

(k) Within sixty (60) days after the source test, an electronic copy of the complete test report, including all operating conditions and monitoring and recordkeeping conducted during the test, shall be submitted to the Regional Air Quality Manager for approval.

(l) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. DEP may grant an extension for a reasonable cause. Additionally, the stack testing and total enclosure construction deadlines may be extended by DEP if necessary if protocol approval has not been granted by DEP Source Testing Section.

[DEP reserves the right to require subsequent source tests while processing a minimum % ELV to be determined by the overall average annual % ELV achieved over a time period that is considered representative of maximum normal conditions over the last 5-year period, or as otherwise directed by DEP. DEP also reserves the right to require subsequent source tests if DEP determines that the source test did not achieve maximum operating conditions, as determined pursuant to the COA, dated June 2, 2023, as amended.]

006 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) In accordance with DEP Rules and Regulations set forth in 25 Pa. Code Chapter 139, within two (2) business days of the source test, the permittee shall begin daily monitoring of VOC emissions continuously from the Hammermill Metal Shredder and Undermill Oscillator using equipment approved by DEP.

(b) The permittee shall continue the monitoring of VOC emissions described in (a) above for a minimum of 200 total hours of normal operation of the Hammermill Metal Shredder. The 200 hours of monitoring of VOC emissions described in (a) are cumulative and shall be completed by November 30, 2025. The permittee shall operate the continuous monitoring equipment at all times while processing material through the Hammermill Metal Shredder during the entire period of the daily monitoring of VOC emissions continuously, except during periods of malfunction of the capture system.

(c) The daily monitoring of VOC emissions continuously shall be conducted at the stack associated with the emission capture system to measure and determine total VOC emissions in ppm and pounds per hour. The permittee shall operate the emission capture system at all times during the daily monitoring of VOC emissions continuously in accordance with the procedures and methods described in the DEP-approved protocol, including maintaining the capture system under negative pressure.

(d) The permittee shall convert each hourly VOC concentration reading taken in ppm into a lb/hr VOC emission rate according to those methods approved by DEP.

(e) The daily monitoring of VOC emissions continuously shall be conducted while the Hammermill Metal Shredder is operating at normal operating conditions. The permittee shall process an amount of end of life vehicles (ELV) representing normal operating conditions.

(f) The permittee shall monitor and record the following parameters during the daily monitoring of VOC emissions continuously:

- (1) hammermill metal shredder operating hours per day,
- (2) material throughput in net tons per day,
- (3) material throughput calculated in net tons per hour based on hours of operation,
- (4) average daily percent ELV, as determined on a monthly basis,
- (5) pressure differential of the enclosure (continuously during operation).

(g) For the daily monitoring of VOC emissions continuously, the permittee shall record:

- (1) one (1)-minute concentration readings in ppm during all operating times,
- (2) one (1)-hour concentration averages in ppm during all operating times,

**SECTION D. Source Level Requirements**

- (3) daily concentration averages in ppm for each operating day,
 (4) the average concentration for 200 operating hours, or more, as applicable, and
 (5) calculated lb/hr values for the above results in (g)(2) through (4).

(h) The permittee shall install, operate, and maintain the monitoring equipment in accordance with the DEP-approved specifications and the DEP-approved operating plan, and any applicable rule or regulation established pursuant to 25 Pa. Code Article III and any other applicable rule promulgated under the Clean Air Act.

(i) Within thirty (30) days after completion of the daily monitoring of VOC emissions continuously, the permittee shall submit an electronic copy of the results of the daily monitoring of VOC emissions, including the results of (g)(1) through (g)(5) of this condition, and all operating conditions and monitoring and recordkeeping conducted during the daily monitoring of VOC emissions, to the Regional Air Quality Manager for review.

(j) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. DEP may grant an extension for a reasonable cause.

III. MONITORING REQUIREMENTS.**# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor the following on a daily basis, when the hammermill is in operation:

- (a) Hammermill hours of operation, and
 (b) Hammermill motor amps.

008 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall inspect each incoming load of scrap for the restricted items listed in the Throughput Restriction Condition for this source.

009 [25 Pa. Code §127.441]**Operating permit 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 (net tons per month) and a temporary VOC emission factor (lb VOC/net ton material) of 0.217 lb VOC/net ton 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.

(c) Per the source testing requirement and alternative testing option, if the permittee chooses to determine two (2) sets of VOC emission factors to include processing end of life vehicles and processing material other than end of life vehicles (zero % ELV), then the appropriate VOC emission factor should be applied to the amount of material processed while taking into account the type of material processed, by using the following equation:

$$\text{VOC} = (Z * (\text{EFZ}) + \text{ELV} * (\text{EFELV})) / 2,000 \text{ lbs/ton}$$

where:

VOC = tons of VOC emissions per 12-month consecutive period
 Z = net tons of zero % ELV processed per 12-month consecutive period
 EFZ = emission factor for zero % ELV emissions as determined during a compliance and DEP-approved source test (lb/net ton)
 ELV = net tons of ELV processed per 12-month consecutive period
 EFELV = emission factor for ELV emissions as determined during a compliance and DEP-approved source test (lb/net ton)

**SECTION D. Source Level Requirements**

[An alternative to the emission calculation method described in (c) above may be approved by DEP upon a request that must be validated prior to implementing.]

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

[DEP reserves the right to recalculate VOC emissions from this source in the years prior to conducting the source test by using an updated VOC emission factor established during a reviewed and approved source test. The permittee has the right to perform a subsequent source test for the purposes of recalculating VOC emissions. If any retesting occurs, the VOC emission factor remains as determined during the last DEP-approved source test until the retest is reviewed and approved by DEP.]

010 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) The permittee shall monitor the amount of material processed (net 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.**# 011 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall keep daily records of the following, when the hammermill is in operation:

- (a) Hammermill operating hours, and
- (b) Hammermill motor amps.

012 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

When manually overriding the wet suppression system, the permittee shall record the:

- (a) Date;
- (b) Start and stop times; and
- (c) Reason for manually overriding the wet suppression system.

013 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) The permittee shall post signage listing all prohibited materials at the facility entrance used by supplier trucks and vehicles.

(b) The permittee shall require all supplier of materials that could potentially contain refrigerants (i.e. CFCs, HCFCs, etc.) or other prohibited materials to have a Scrap Acceptance Agreement and shall keep a copy of each agreement on site.

014 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall keep daily records of the inspections performed for restricted items with each incoming load of scrap.

015 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) The permittee shall maintain records of the amount of material processed (net 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.

**SECTION D. Source Level Requirements****# 016 [25 Pa. Code §127.441]****Operating permit 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.

017 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall keep a record of all employee training conducted as required in this permit, including refresher training, for a minimum of five (5) years.

018 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) The permittee shall record each inspection of the water spray nozzles, including the date of each inspection and any corrective actions taken, in the logbook (in written or electronic format). The permittee shall keep the logbook onsite and make hard copies (whichever is requested) of the logbook available to DEP upon request.

(b) The permittee shall specify in the logbook entry the control mechanism being used if the permittee ceases operation of the wet suppression system.

019 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain onsite a copy of the latest source test report and records of all data gathered during the latest source test, including the VOC and PM emission factors determined during testing.

020 [25 Pa. Code §127.441]**Operating permit 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.

021 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain records of all malfunctions occurring with the capture system, including but not limited to malfunction of the fan, damage to the enclosure, etc. For each malfunction of the capture system, the permittee shall record:

- (a) date and time the capture system was down,
- (b) date and time the capture system resumed normal activity,
- (c) the reason for the malfunction,
- (d) corrective action taken.

V. REPORTING REQUIREMENTS.**# 022 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall notify DEP, in writing, of the intent to begin construction of the total enclosure at least five (5) business days prior to the intended date of commencement of construction of the total enclosure.

(b) If construction of the total enclosure began prior to issuance of this permit, the permittee shall notify DEP, in writing, of the date construction of the total enclosure commenced within five (5) business days after permit issuance.

(c) The permittee shall notify DEP, in writing, the date of the completion of construction and installation of the total enclosure within five (5) business days after the completion.

**SECTION D. Source Level Requirements**

(d) The permittee shall notify DEP, in writing, the date of the completion of installation of the equipment to provide daily monitoring for VOCs continuously within five (5) business days after the completion.

023 [25 Pa. Code §127.441]**Operating permit 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 net 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 net tons per year and maximum monthly average % ELV), and any supporting calculations.

024 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

Within 30 days after notification from DEP that an alternative VOC emission factor applies, the permittee shall revise and submit to DEP emission inventory reports and supporting VOC emission recordkeeping affected by the recalculation of VOC emissions based on the applicable VOC emission factor for calendar years 2019 through 2024.

VI. WORK PRACTICE REQUIREMENTS.**# 025 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The inspections for restricted materials shall be performed by an employee as the scrap is unloaded in the staging area.

(b) If night deliveries of scrap are made, additional personnel shall assist in the unloading area.

(c) Any and all items found that are not allowed by this permit shall be promptly removed and disposed of properly.

026 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) Only properly trained employees shall operate the shredder. A properly trained employee shall be defined as one who received training on the system from the manufacturer, or an experienced operator. After initial training, only properly trained employees may train new employees.

(b) Refresher training shall be held on an annual basis.

(c) All training shall include, at a minimum:

- (1) Hammermill operation and shutdown procedures,
- (2) Manual override procedures on the suppression system,
- (3) Inspection procedures for incoming deliveries,
- (4) Proper operating procedures of the air classification system, and
- (5) Emergency procedures.

027 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

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.

028 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall initiate corrective action within 24 hours and complete corrective action as expeditiously as practical if the permittee finds that water is not flowing properly during an inspection of the water spray nozzles.

**SECTION D. Source Level Requirements****# 029 [25 Pa. Code §127.441]****Operating permit 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 inspection to confirm the non-existence of VOC and HAP containing fluids. Fluids shall include, but are not limited to, gasoline, motor oil, antifreeze, transmission oil, and hydraulic fluid.

030 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

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

- (a) Depollution of whole, unflatten ELV
- (b) Inbound material acceptance and inspection program
- (c) Require suppliers to certify that flattened ELV are drained of fluids (e.g., gasoline, motor oil, refrigerants, etc.).

031 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

On or before July 31, 2025, or thirty (30) calendar days following DEP's approval of a stack testing protocol, whichever is later, the permittee shall complete installation of the total enclosure, including the installation of the equipment to provide daily monitoring for VOC continuously, which shall be consistent with how the total enclosure and equipment are presented in the DEP-approved stack test protocol.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

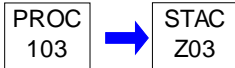
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 103

Source Name: CONVEYORS & STOCKPILES

Source Capacity/Throughput:

**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit total fugitive particulate matter emissions from this source to 10.65 tons per year, based on a 12-month rolling sum.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate total fugitive particulate matter emissions from this source using actual material throughput for the hammermill metal shredder (Source ID 101), and the PM emission factor derived from Equation 1 of AP-42 Section 13.2.4 which is based on a variety of factors such as wind speed and moisture content of material.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of total fugitive particulate matter emissions from this source on a monthly and 12-month rolling sum.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the parameters used to calculate the PM emission factor for this source, including, but not limited to the annual average wind speed for the site location and the annual average moisture content of material.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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 (Source ID 101) resulting in higher moisture content downstream of the hammermill metal shredder at the conveyors and stockpiles (Source 103).

**SECTION D. Source Level Requirements****VII. ADDITIONAL REQUIREMENTS.****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Source ID 103 includes 16 conveyors associated with the hammermill metal shredder and 30 conveyors associated with the MRP Plant (material separation activities).

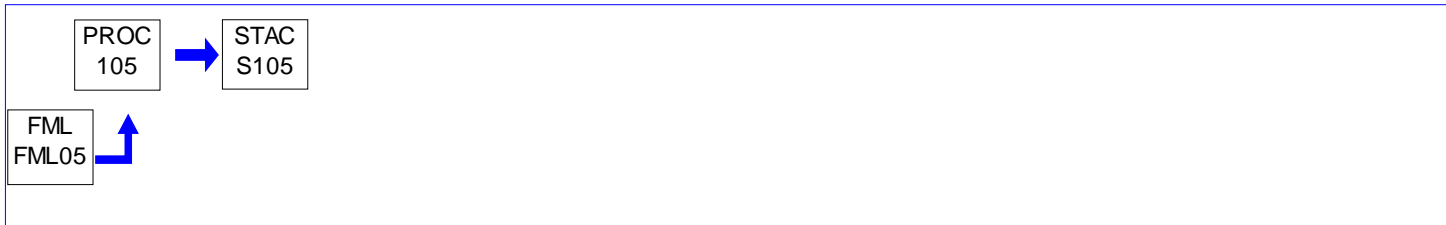
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**SECTION D. Source Level Requirements**

Source ID: 105

Source Name: EMERGENCY ENGINE

Source Capacity/Throughput:

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

The permittee shall ensure that emission into the outdoor atmosphere of particulate matter from the emergency engine occurs in such a manner that the concentration of particulate matter in the effluent gas does not exceed 0.04 gr/dscf, according to 25 Pa. Code § 123.13(c)(1)(i).

[The method of compliance for this permit condition is using proper fuels as approved herein.]

002 [25 Pa. Code §123.21]**General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

[Compliance with this condition is streamlined in 40 CFR § 60.4207(b) and § 80.510(b), by using diesel fuel oil with a sulfur content of 15ppm maximum.]

Fuel Restriction(s).**# 003 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4207]****Subpart III - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines****What fuel requirements must I meet if I am an owner or operator of a stationary CI internal combustion engine subject to**

[Additional authority for this permit condition is also derived from 40 CFR §§ 60.4207(b) and 1090.305.]

The permittee shall ensure that diesel fuel is the only fuel consumed by this engine. The diesel fuel shall comply with the following per-gallon standards:

- (a) Sulfur content: 15 ppm maximum.
- (b) Cetane index or aromatic content, as follows:
 - (1) A minimum cetane index of 40; or
 - (2) A maximum aromatic content of 35 volume percent.

[Compliance with this streamlined condition assures compliance with 25 Pa. Code § 123.21(b).]

Operation Hours Restriction(s).**# 004 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4211]****Subpart III - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines****What are my compliance requirements if I am an owner or operator of a stationary CI internal combustion engine?**

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 122 and 40 CFR § 60.4211(f).]

The permittee shall operate the emergency stationary ICE according to the requirements in paragraphs (a) and (b) of this condition. In order for the engine to be considered an emergency stationary ICE under 40 CFR Part 60 Subpart III, any

**SECTION D. Source Level Requirements**

operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (a) and (b) of this condition, is prohibited. If the permittee does not operate the engine according to the requirements in paragraphs (a) and (b) of this condition, the engine will not be considered an emergency engine under Subpart IIII and must meet all requirements for non-emergency engines.

(a) The permittee may operate the emergency stationary ICE for any combination of the purposes of maintenance checks and readiness testing for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (b) of this condition counts as part of the 100 hours per calendar year allowed by this paragraph (a). Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

(b) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph (a) of this condition.

II. TESTING REQUIREMENTS.

005 [25 Pa. Code §139.16]

Sulfur in fuel oil.

(a) The following are applicable to tests for the analysis of commercial fuel oil:

(1) The fuel oil sample for chemical analysis shall be collected in a manner that provides a representative sample. Upon the request of a Department official, the person responsible for the operation of the source shall collect the sample employing the procedures and equipment specified in 25 Pa. Code § 139.4(10) (relating to references).

(2) Test methods and procedures for the determination of viscosity shall be that specified in 25 Pa. Code § 139.4(11) (relating to references). The viscosity shall be determined at 100°F.

(3) Tests methods and procedures for the determination of sulfur shall be those specified in 25 Pa. Code § 139.4(12)--(15).

(4) Results shall be reported in accordance with the units specified in 25 Pa. Code § 123.22 (relating to combustion units).

(b) The testing requirements in subpart (a) above, shall be waived in the event that a delivery receipt from the supplier, showing the percentage sulfur in the fuel, is obtained each time a fuel oil delivery is made.

III. MONITORING REQUIREMENTS.

006 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4209]

Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**What are the monitoring requirements if I am an owner or operator of a stationary CI internal combustion engine?**

[Additional authority for this permit condition is also derived from 40 CFR § 60.4209(a).]

The permittee shall monitor the hours of operation of the engine through the use of a non-resettable hour meter.

IV. RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain records of the following information, for each shipment of diesel fuel recieved, obtained either by laboratory analysis or from the fuel supplier's certification:

**SECTION D. Source Level Requirements**

- (a) Sulfur content,
 (b) Cetane index or aromatic content.

008 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall record the hours of operation for the engine on a monthly basis, including 12-month rolling sums and the reason for operation.

009 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall keep records on site to demonstrate compliance that this engine is EPA certified (i.e. certificate of conformity or Tier certification, etc.) and in compliance with the emission standards as required by 40 CFR § 60.4202(a)(2).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

VI. WORK PRACTICE REQUIREMENTS.**# 010 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4202]****Subpart III - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines****What emission standards must I meet for emergency engines if I am a stationary CI internal combustion engine manufacturer?**

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 122, 40 CFR § 60.4202(a)(2), and 40 CFR § 60.4205(b) and 40 CFR Part 1039 Appendix I.]

The emergency stationary CI internal combustion engine shall be certified to meet the Tier 3 emission standards specified in 40 CFR Part 1039, Appendix I for all pollutants as follows (for engines with a rated power between 37 and 75 kW):

- (a) NO_x + NMHC: 4.7 g/kW-hr
 (b) CO: 5.0 g/kW-hr
 (c) PM: 0.40 g/kW-hr

[Compliance with (c) assures compliance with the particulate matter standard of 0.04 gr/dscf as per 25 Pa. Code § 123.13(c)(1)(i).]

011 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4211]**Subpart III - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines****What are my compliance requirements if I am an owner or operator of a stationary CI internal combustion engine?**

[Additional authority for this permit condition is also derived from 25 Pa. Code Chapter 122 and 40 CFR § 60.4211.]

- (a) The permittee shall install and configure the engine in accordance with the manufacturer specifications.
- (b) The permittee shall operate and maintain the engine in accordance with one of the following:
- (1) The manufacturers' written instructions and/or specifications, or
 - (2) Permittee-developed procedures that are approved by the manufacturer. Only those settings that are permitted to be changed by the manufacturer may be changed.

VII. ADDITIONAL REQUIREMENTS.**# 012 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This engine is subject to the Standards of Performance for New Stationary Sources Subpart III and shall comply with all

**SECTION D. Source Level Requirements**

applicable requirements of this Subpart. In accordance with 40 CFR § 60.4, copies of all requests, reports, applications, submittals, and other communications are required to be submitted to both the EPA and DEP. NSPS reports may be submitted electronically to EPA's Central Data Exchange: <https://cdx.epa.gov>.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 105 is a Tier 3, 60 kW (80 hp) diesel engine manufactured by John Deere, powering a Kohler emergency generator supporting emergency power and light.

***** Permit Shield in Effect. *****



SECTION E. Source Group Restrictions.



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.

**SECTION G. Emission Restriction Summary.**

| Source Id | Source Description | | |
|-----------------------|--|---------------------------------|------|
| 101 | HAMMERMILL METAL SHREDDER AND UNDERMILL OSCILLATOR | | |
| Emission Limit | | Pollutant | |
| 24.900 | Tons/Yr | based on a 12-month rolling sum | VOC |
| 103 | CONVEYORS & STOCKPILES | | |
| Emission Limit | | Pollutant | |
| 10.650 | Tons/Yr | based on a 12-month rolling sum | PM10 |
| 105 | EMERGENCY ENGINE | | |
| Emission Limit | | Pollutant | |
| 0.040 | gr/DRY FT3 | | PM10 |
| 500.000 | PPMV | | SOX |

Site Emission Restriction Summary

| Emission Limit | | | Pollutant |
|----------------|---------|---------------------------------|-----------|
| 49.900 | Tons/Yr | based on a 12-month rolling sum | VOC |

**SECTION H. Miscellaneous.**

The basis for certain terms and conditions set forth in this operating permit were derived from Plan Approval, number 09-0187.

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:

1. Used oil space heater, rated at 0.5 MMBtu/hr
2. Remote reservoir cold cleaning parts washer using solvent containing less than 5% VOC
3. SEDA depollution closed-loop system to include:
 - a. Two (2) 1,000-gallon tanks receiving gasoline drained from ELV
 - b. One (1) 1,000-gallon tank receiving oil drained from ELV
 - c. One (1) 500-gallon tank for antifreeze drained from ELV
4. 10,000-gallon diesel storage tank
5. Eight (8) 1,000 gallons or less storage tanks: hydraulic oil, motor oil and used oil
6. Air Classifier, which is a fundamental part of the downstream material separation process, removing the light-weight fraction of the shredded material following processing at the hammermill and the initial removal of ferrous metals using magnets. The air flow used to separate the light fraction is introduced back into the classifier following the removal of light-weight materials. The system operates in a closed-loop system constantly keeping the air classifier under neutral pressure, resulting in no emissions to the atmosphere.

September 2007. APS 622331, AUTH ID 691351. The Department issued an initial operating permit following the completion of the above plan approval.

September 2009. APS 700016, AUTH ID 803027. Administrative Amendment to address a Change of Ownership from Fairless Iron & Metal, LLC (Federal Tax ID number 01-0792410-1) to Simsmetal East, LLC (Federal Tax ID number 20-8484120-1).

November 2012. APS 622331, AUTH ID 915866. No new regulations and no new sources from previous permit. eRFD number 3089, the use of oxy-propane cutting torches to cut scrap metal is exempt from plan approval requirements.

June 2014. APS 700016, AUTH ID 1028275. Amendment to address the correct name of the permittee.

August 2014. APS 700016, AUTH ID 1038853. Amendment to incorporate missing conditions from the June 2014 amended operating permit.

November 2017. APS 622331, AUTH ID 1177699. Permit renewal. No changes at the facility and no new applicable regulations. RFD (paper version) submitted and approved on July 25, 2017 for the installation of an insulated copper wire granulation system.

MARCH 2025. APS 700016, AUTH ID 1442509. Permit renewal. The facility status is changed from NMOP to TVOP. Source ID 105 (Emergency Engine) is added to Section A and Section D. The responsible official is updated from Mr. Josh Emery to Mr. Andrew Hannan. A facility-wide VOC emission limit of 50 tpy has been added to Section C of the permit. A VOC emission limit of 25 tpy and testing requirements have been added to Source ID 101 in Section D of the permit. Sources of minor significance have been added to Miscellaneous Section of the permit.



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