



**AIR QUALITY PROGRAM**  
**836 Fulton Street**  
**Pittsburgh, PA 15233-2124**

**Synthetic Minor Source**  
**Operating Permit**

**Issued To:** Metalico Pittsburgh, Inc.  
**Facility:** Metalico Pittsburgh, Inc.  
3100 Grand Avenue  
Neville Township, PA 15225

**ACHD Permit #:** 0692-OP24  
**Date of Issuance:** April 18, 2024  
**Expiration Date:** April 17, 2029  
**Renewal Date:** October 17, 2028

**Issued By:**   
JoAnn Fruchan, P.E.  
Program Manager, Engineering

**Prepared By:**   
Michael Dorman  
Air Quality Engineer

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**AMENDMENTS:**

***DATE***      ***SECTION(S)***

**I. CONTACT INFORMATION**

**Facility Location:** **Metalico Pittsburgh, Inc.**  
3100 Grand Avenue  
Neville Township, PA 15225

**Permittee/Owner:** **Metalico Pittsburgh, Inc.**  
3100 Grand Avenue  
Neville Township, PA 15225

**Permittee/Operator:**  
**(if not Owner)**

**Responsible Official:** **Glenda K. Wehrli**  
**Title:** Director of Environmental Compliance & Employee Safety  
**Company:** **Metalico Pittsburgh, Inc.**  
**Address:** 3100 Grand Avenue  
Neville Township, PA 15225

**Telephone Number:** 412-771-7000 ext 5033  
**Fax Number:** 412-771-3340

**Facility Contact:** **Glenda K. Wehrli**  
**Title:** Director of Environmental Compliance & Employee Safety  
**Telephone Number:** 412-771-7100 ext 5033  
**Fax Number:** 412-771-3340  
**E-mail Address:** [gwehrli@metalico.com](mailto:gwehrli@metalico.com)

**AGENCY ADDRESSES:**

**ACHD Contact:** **Chief Engineer**  
**Allegheny County Health Department**  
Air Quality Program  
836 Fulton Street  
Pittsburgh, PA 15233-2124  
[aqpermits@alleghenycounty.us](mailto:aqpermits@alleghenycounty.us)

## II. FACILITY DESCRIPTION

Metalico Pittsburgh, Inc. is a scrap metal recycling facility located at 3100 Grand Avenue on Neville Island in Allegheny County. The facility specializes in the recycling of ferrous and non-ferrous metals. The facility receives, sorts, stores, and processes (shearing, baling, shredding, etc.) various scrap metals. The process consists of a shredder, a ferrous material separator, and a non-ferrous material separator. Non-metallic material (fluff) from automobiles and appliances is separated from the ferrous and non-ferrous scrap and sent to a landfill for disposal.

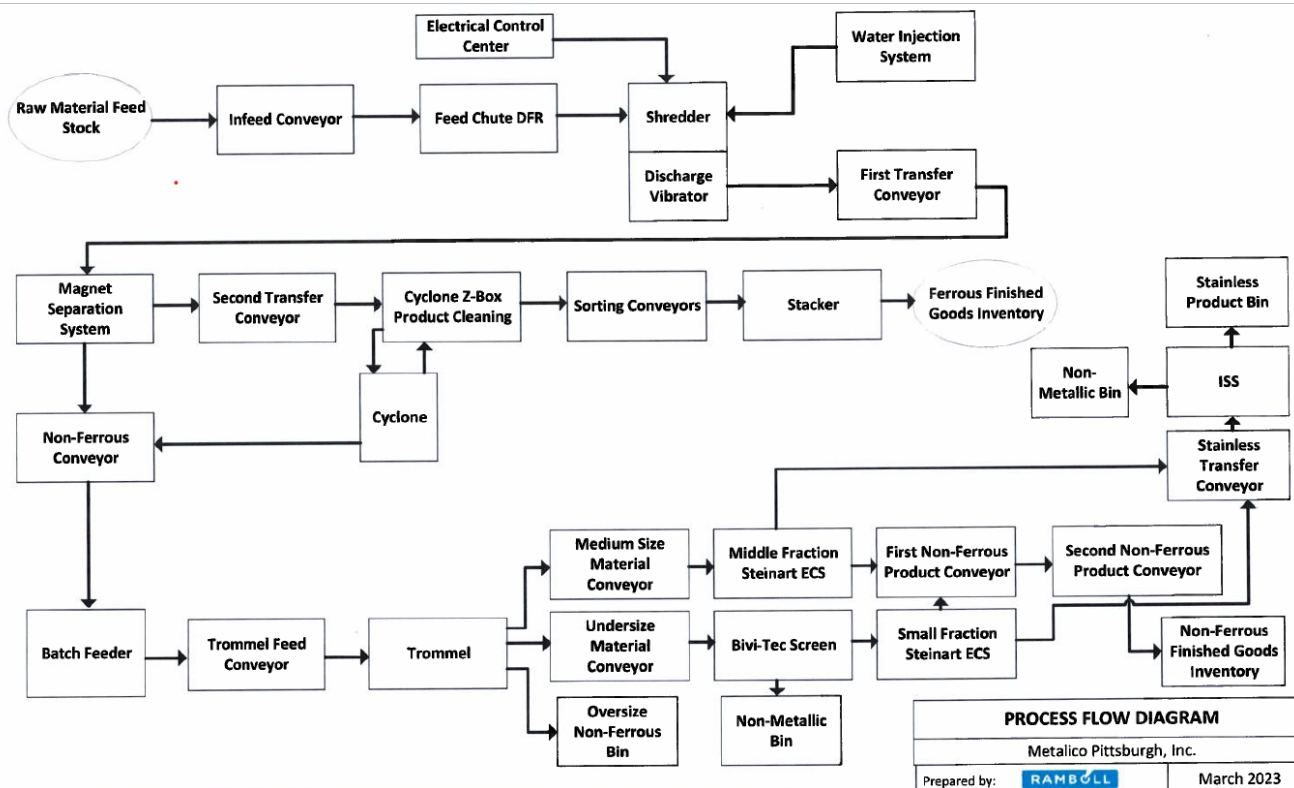
The facility is a synthetic minor source of particulate matter (PM), particulate matter < 10 microns in diameter (PM<sub>10</sub>), particulate matter < 2.5 microns in diameter (PM<sub>2.5</sub>) and volatile organic Compounds (VOCs). It is a minor source for sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO) and hazardous air pollutants (HAPs) as defined in section 2101.20 of Article XXI. The facility limits PM and VOC emissions by limiting operation of the shredder.

The emission units regulated by this permit are summarized in Table II-1:

TABLE II-1: Emission Unit Identification

I.D.	SOURCE DESCRIPTION	CONTROL DEVICE(S)	MAXIMUM CAPACITY	FUEL/RAW MATERIAL	STACK I.D.
P-001	Scrap Metal Shredder	Cyclone	120 tph	Scrap metal	S001
B-001	Clean Burn Coil Tube Boiler Model: CB-500-CTB	None	0.5 MMBtu/Hr	Waste Oil	S002
T-001	1,000 gallon On-road Diesel Tank	None	1,000 gal	Diesel Fuel	
T-002	3,000 gallon Off-road Diesel Tank	None	3,000 gal	Diesel Fuel	
T-003	3,000 gallon Off-road Diesel Tank	None	3,000 gal	Diesel Fuel	
T-004	3,000 gallon Used Oil Tank	None	3,000 gal	Used Oil	
T-005	10,000 gallon Off-road Diesel Tank	None	10,000 gal	Diesel Fuel	
T-006	10,000 gallon On-road Diesel Tank	None	10,000 gal	Diesel Fuel	
PW-001	Parts Washer	None	15 – 20 gal	ZEP DYNA 143 solvent	
PW-002	Parts Washer	None	15 – 20 gal	ZEP DYNA 143 solvent	
F-001	Loading Barges and Trucks	Wetting Material		Scrap	
TC-001	Torch Cutting	None		Scrap	

Process Flow Diagram



### ***DECLARATION OF POLICY***

*Pollution prevention is recognized as the preferred strategy (over pollution control) for reducing risk to air resources. Accordingly, pollution prevention measures should be integrated into air pollution control programs wherever possible, and the adoption by sources of cost-effective compliance strategies, incorporating pollution prevention, is encouraged. The Department will give expedited consideration to any permit modification request based on pollution prevention principles.*

**The permittee is subject to the terms and conditions set forth below. These terms and conditions constitute provisions of Allegheny County Health Department Rules and Regulations, Article XXI Air Pollution Control. The subject equipment has been conditionally approved for operation. The equipment shall be operated in conformity with the plans, specifications, conditions, and instructions which are part of your application, and may be periodically inspected for compliance by the Department. In the event that the terms and conditions of this permit or the applicable provisions of Article XXI conflict with the application for this permit, these terms and conditions and the applicable provisions of Article XXI shall prevail. Additionally, nothing in this permit relieves the permittee from the obligation to comply with all applicable Federal, State and Local laws and regulations.**

### **III. GENERAL CONDITIONS**

#### **1. Prohibition of Air Pollution (§2101.11)**

- a. It shall be a violation of this permit to fail to comply with, or to cause or assist in the violation of, any requirement of this permit, or any order or permit issued pursuant to authority granted by Article XXI. The permittee shall not willfully, negligently, or through the failure to provide and operate necessary control equipment or to take necessary precautions, operate any source of air contaminants in such manner that emissions from such source:
  - 1) Exceed the amounts permitted by this permit or by any order or permit issued pursuant to Article XXI;
  - 2) Cause an exceedance of the ambient air quality standards established by Article XXI §2101.10;  
or
  - 3) May reasonably be anticipated to endanger the public health, safety, or welfare.
- b. It shall be a violation of this permit to operate, or allow to be operated, any source in such manner as to allow the release of air contaminants into the open air or to cause air pollution as defined in Article XXI, except as is explicitly permitted by this permit or Article XXI.

#### **2. Definitions (§2101.20)**

- a. Except as specifically provided in this permit, terms used retain the meaning accorded them under the applicable provisions and requirements of Article XXI or the applicable federal or state regulation. Whenever used in this permit, or in any action taken pursuant to this permit, the words and phrases shall have the meanings stated, unless the context clearly indicates otherwise.
- b. Unless specified otherwise in this permit or in the applicable regulation, the term “year” shall mean any twelve (12) consecutive months.

**3. Conditions (§2102.03.c)**

It shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02, for any person to fail to comply with any terms or conditions set forth in this permit.

**4. Certification (§2102.01)**

Any report, or compliance certification submitted under this permit shall contain written certification by a responsible official as to truth, accuracy, and completeness. This certification and any other certification required under this permit shall be signed by a responsible official of the source, and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

**5. Transfers (§2102.03.e)**

This permit shall not be transferable from one person to another, except in accordance with Article XXI §2102.03.e and in cases of change-in-ownership which are documented to the satisfaction of the Department, and shall be valid only for the specific sources and equipment for which this permit was issued. The transfer of permits in the case of change-in-ownership may be made consistent with the administrative permit amendment procedure of Article XXI §2103.14.b. The required documentation and fee must be received by the Department at least 30 days before the intended transfer date.

**6. Term (§2103.12.e, §2103.13.a)**

- a. This permit shall remain valid for five (5) years from the date of issuance, or such other shorter period if required by the Clean Air Act, unless revoked. The terms and conditions of an expired permit shall automatically continue pending issuance of a new operating permit provided the permittee has submitted a timely and complete application and paid applicable fees required under Article XXI Part C, and the Department through no fault of the permittee is unable to issue or deny a new permit before the expiration of the previous permit.
- b. Expiration. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with the requirements of Article XXI Part C.

**7. Need to Halt or Reduce Activity Not a Defense (§2103.12.f.2)**

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.

**8. Property Rights (§2103.12.f.4)**

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

**9. Duty to Provide Information (§2103.12.f.5)**

- a. The permittee shall furnish to the Department in writing within a reasonable time, any information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of any records required to be kept by the permit.



- b. Upon cause shown by the permittee the records, reports, or information, or a particular portion thereof, claimed by the permittee to be confidential shall be submitted to the Department in accordance with the requirements of Article XXI, §2101.07.d.4. Information submitted to the Department under a claim of confidentiality, shall be available to the US EPA and the PADEP upon request and without restriction. Upon request of the permittee the confidential information may be submitted to the USEPA and PADEP directly. Emission data or any portions of any draft, proposed, or issued permits shall not be considered confidential.

**10. Modification of Section 112(b) Pollutants which are VOCs or PM<sub>10</sub> (§2103.12.f.7)**

Except where precluded under the Clean Air Act or federal regulations promulgated under the Clean Air Act, if this permit limits the emissions of VOCs or PM<sub>10</sub> but does not limit the emissions of any hazardous air pollutants, the mixture of hazardous air pollutants which are VOCs or PM<sub>10</sub> can be modified so long as no permit emission limitations are violated. A log of all mixtures and changes shall be kept and reported to the Department with the next report required after each change.

**11. Right to Access (§2103.12.h.2)**

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized Department and other federal, state, county, and local government representatives to:

- a. Enter upon the permittee's premises where a permitted source is located or an emissions-related activity is conducted, or where records are or should be kept under the conditions of the permit;
- b. Have access to, copy and remove, at reasonable times, any records that must be kept under the conditions of the permit;
- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. As authorized by either Article XXI or the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.

**12. Certification of Compliance (§2103.12.h.5.)**

- a. The permittee shall submit on an annual basis, certification of compliance with all terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification of compliance shall be made consistent with General Condition III.4 above and shall include the following information at a minimum:
  - 1) The identification of each term or condition of the permit that is the basis of the certification;
  - 2) The compliance status;
  - 3) Whether any noncompliance was continuous or intermittent;
  - 4) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with the provisions of this permit; and
  - 5) Such other facts as the Department may require to determine the compliance status of the source.
- b. All certification of compliance forms must be submitted to the Department by March 1<sup>st</sup> of each year for the time period beginning January 1<sup>st</sup> and ending December 31<sup>st</sup> of the previous year. The first report shall be due March 1, 2024 for the time period beginning on the issuance date of this

permit through December 31, 2023. Compliance certifications may be emailed to the Department at [aqreports@alleghenycounty.us](mailto:aqreports@alleghenycounty.us) in lieu of mailing a hard copy.

### 13. Record Keeping Requirements (§2103.12.j.1)

- a. The permittee shall maintain 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 date(s) analyses were performed;
  - 3) The company or entity that performed the analyses;
  - 4) The analytical techniques or methods used;
  - 5) The results of such analyses; and
  - 6) The operating parameters existing at the time of sampling or measurement.
- b. 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 and emission statements in Article XXI §2108.01.e. 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.

### 14. Retention of Records (§2103.12.j.2)

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

### 15. Reporting Requirements (§2103.12.k)

- a. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the Responsible Official.
- b. Prompt reporting of deviations from permit requirements is required, including those attributable to upset conditions as defined in this permit and Article XXI §2108.01.c, the probable cause of such deviations, and any corrective actions or preventive measures taken.
- c. All reports submitted to the Department shall comply with the certification requirements of General Condition III.4 above.
- d. Semiannual reports required by this permit shall be submitted to the Department as follows:
  - 1) One semiannual report is due by July 31<sup>st</sup> of each year for the time period beginning January 1<sup>st</sup> and ending June 30<sup>th</sup> of the current year.
  - 2) One semiannual report is due by February 1<sup>st</sup> of each year for the time period beginning July 1<sup>st</sup> and ending December 31<sup>st</sup> of the previous year.
  - 3) The first semiannual report shall be due February 1, 2024 for the time period beginning on the issuance date of this permit through December 31, 2023.

- e. Reports may be emailed to the Department at [aqreports@alleghenycounty.us](mailto:aqreports@alleghenycounty.us) in lieu of mailing a hard copy.

**16. Severability Requirement (§2103.12.l)**

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

**17. Existing Source Reactivations (§2103.13.d)**

The permittee shall not reactivate any source that has been out of operation or production for a period of one year or more unless the permittee has submitted a reactivation plan request to, and received a written reactivation plan approval from, the Department. Existing source reactivations shall meet all requirements of Article XXI §2103.13.d.

**18. Administrative Permit Amendment Procedures (§2103.14.b)**

An administrative permit amendment may be made consistent with the procedures of Article XXI §2103.14.b and §2103.24.b. Administrative permit amendments are not authorized for any amendment precluded by the Clean Air Act or the regulations there under.

**19. Revisions and Minor Permit Modification Procedures (§2103.14.c)**

Sources may apply for revisions and minor permit modifications on an expedited basis in accordance with Article XXI §2103.14.c and §2103.24.a.

**20. Significant Permit Modifications (§2103.14.d)**

Significant permit modifications shall meet all requirements of the applicable subparts of Article XXI, Part C, including those for applications, fees, public participation, review by affected States, and review by EPA, as they apply to permit issuance and permit renewal. The approval of a significant permit modification, if the entire permit has been reopened for review, shall commence a new full five (5) year permit term. The Department shall take final action on all such permits within nine (9) months following receipt of a complete application.

**21. Duty to Comply (§2103.12.f.1)**

The permittee shall comply with all permit conditions and all other applicable requirements at all times. Any permit noncompliance constitutes a violation of the Clean Air Act, the Air Pollution Control Act, and Article XXI and is grounds for any and all enforcement action, including, but not limited to, permit termination, revocation and reissuance, or modification, and denial of a permit renewal application.

**22. Renewals (§2103.13.b.)**

Renewal of this permit is subject to the same fees and procedural requirements, including those for public participation and affected State and EPA review, that apply to initial permit issuance. The application for renewal shall be submitted at least six (6) months but not more than eighteen (18) months prior to expiration of this permit. The application shall also include submission of a supplemental compliance review as required by Article XXI §2102.01.

**23. Reopenings for Cause (§2103.12.f.3, §2103.15.a)**

- a. This permit shall be reopened and reissued under any of the following circumstances:
- 1) Additional requirements under the Clean Air Act become applicable to a source. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended solely due to the failure of the Department to act on a permit renewal application in a timely fashion.
  - 2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.
  - 3) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
  - 4) The Administrator or the Department determines that this permit must be reissued or revoked to assure compliance with the applicable requirements.
- b. This 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 any permit condition. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in this permit.

**24. Annual Operating Permit Administration Fee (§2103.40)**

In each year during the term of this permit, on or before the last day of the month in which the application for this permit was submitted, the permittee shall submit to the Department, in addition to any other applicable administration fees, an Annual Operating Permit Administration Fee in accordance with §2103.40. by check or money order payable to the “Allegheny County Air Pollution Control Fund” in the amount specified in the fee schedule applicable at that time.

**25. Other Requirements not Affected (§2104.08, §2105.02)**

Compliance with the requirements of this permit shall not in any manner relieve any person from the duty to fully comply with any other applicable Federal, State, or County statute, rule, regulation, or the like, including but not limited to the odor emission standards under Article XXI §2104.04, any applicable NSPSs, NESHAPs, MACTs, or Generally Achievable Control Technology (GACT) standards now or hereafter established by the EPA, and any applicable requirements of BACT or LAER as provided by Article XXI, any condition contained in any applicable Installation or Operating Permit and/or any additional or more stringent requirements contained in an order issued to such person pursuant to Article XXI Part I.

**26. Termination of Operation (§2108.01.a)**

In the event that operation of any source of air contaminants is permanently terminated, the person responsible for such source shall so report, in writing, to the Department within 60 days of such termination.

**27. Tests by the Department (§2108.02.d)**

Notwithstanding any tests conducted pursuant to Article XXI §2108.02, the Department or another entity designated by the Department may conduct emissions testing on any source or air pollution control equipment. At the request of the Department, the person responsible for such source or equipment shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance of such tests.

**28. Other Rights and Remedies Preserved (§2109.02.b)**

Nothing in this permit shall be construed as impairing any right or remedy now existing or hereafter created in equity, common law or statutory law with respect to air pollution, nor shall any court be deprived of such jurisdiction for the reason that such air pollution constitutes a violation of this permit.

**29. Enforcement and Emergency Orders (§2109.03, §2109.05)**

- a. The person responsible for this source shall be subject to any and all enforcement and emergency orders issued to it by the Department in accordance with Article XXI §2109.03, §2109.04 and §2109.05.
- b. Upon request, any person aggrieved by an Enforcement Order or Emergency Order shall be granted a hearing as provided by Article XXI §2109.03.d; provided however, that an Emergency Order shall continue in full force and effect notwithstanding the pendency of any such appeal.
- c. Failure to comply with an Enforcement Order or immediately comply with an Emergency Order shall be a violation of this permit thus giving rise to the remedies provided by Article XXI §2109.02.

**30. Penalties, Fines, and Interest (§2109.07.a)**

A source that fails to pay any fee required under this permit when due shall pay a civil penalty of 50% of the fee amount, plus interest on the fee amount computed in accordance with Article XXI §2109.06.a.4 from the date the fee was required to be paid. In addition, the source may have this permit revoked for failure to pay any fee required.

**31. Appeals (§2109.10)**

In accordance with State Law and County regulations and ordinances, any person aggrieved by an order or other final action of the Department issued pursuant to Article XXI or any unsuccessful petitioner to the Administrator under Article XXI Part C, Subpart 2, shall have the right to appeal the action to the Director in accordance with the applicable County regulations and ordinances.

**32. Risk Management (§2104.08, 40 CFR Part 68)**

Should this stationary source, as defined in 40 CFR Part 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in Part 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by General Condition III.12 above.

**33. Operational Flexibility (§2103.14.a)**

- a. The owner or operator shall not make any changes at this source, including trades of increases and decreases in emissions within the permitted source, without first obtaining a permit revision for such changes, unless:
  - 1) The changes do not require an Installation Permit under §2102.04 of this Article or violate the terms of an Operating Permit or an Installation Permit;
  - 2) The permit specifically allows for changes that do not cause specific emissions increases greater than a *de minimis* emission increase, and the changes do not exceed such emissions increase allowed under the permit, in accordance with General Condition III.34 below;
  - 3) The changes do not violate major source applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements; and
  - 4) By no later than seven (7) days prior to the date on which the implementation of the proposed change is commenced, a written notification is submitted to the Department, for attachment to the Department's copy of the relevant permit, which includes:
    - a) A brief description of the change within the permitted source;
    - b) The date on which the change will occur;
    - c) The pollutants emitted; and
    - d) Any change in emissions.

**34. De Minimis Emission Increases (§2103.14.e)**

- a. The Department may allow, as a condition of an Operating Permit, *de minimis* emission increases from a new or existing source up to the amounts authorized in condition III.34.d below.
- b. A *de minimis* increase may not occur at a source if it either:
  - 1) Increases the emissions of a pollutant regulated under Section 112 of the Clean Air Act (42 U.S.C.A. §7412) except as authorized in conditions III.34.d.4) and 5) below;
  - 2) Subjects the source to the permit requirements of Article XXI, §§2102.05, 2102.06, or 2102.07 (relating to prevention of significant deterioration of air quality and major new source and major modification review); or
  - 3) Violates an applicable requirement of this Article, the state Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under the Air Pollution Control Act or the Clean Air Act.
- c. The permittee shall provide the Department with 7 days prior written notice of any *de minimis* emission increase. The notice shall identify and describe the pollutants that will be emitted as a result of the *de minimis* emissions increase and provide emission rates in tons/year and in terms necessary to establish compliance consistent with any applicable requirement. The Department may disapprove or condition the *de minimis* emission increase at any time.
- d. Except as provided in condition III.34.e below, the maximum *de minimis* emission rate increases, as measured in tons/year, that may be authorized in the permit during the term of the permit are:
  - 1) Four tons of carbon monoxide from an emissions unit during the term of the permit and 20 tons of carbon monoxide at the source during the term of the permit;
  - 2) One ton of NO<sub>x</sub> from an emissions unit during the term of the permit and 5 tons of NO<sub>x</sub> at the source during the term of the permit;

- 3) One and six-tenths tons of oxides of sulfur from an emissions unit during the term of the permit and 8.0 tons of oxides of sulfur at the source during the term of the permit;
  - 4) Six-tenths of a ton of PM<sub>10</sub> from an emissions unit during the term of the permit and 3.0 tons of PM<sub>10</sub> at the source 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, the regulations thereunder, or Article XXI; and
  - 5) One ton of VOC's from an emissions unit during the term of the permit and 5 tons of VOC's at the source 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, the regulations thereunder, or Article XXI.
- e. The Department may allow, as a condition of an operating permit, installation of the minor sources exempted under §2102.04.a.5 of Article XXI.
  - f. *De minimis* emission threshold levels cannot be met by offsetting emission increases with emission decreases at the same emissions unit.

**35. Circumvention (§2101.14)**

For purposes of determining compliance with the provisions of this permit and Article XXI, no credit shall be given to any person for any device or technique, including but not limited to the operation of any source with unnecessary amounts of air, the combining of separate sources except as specifically permitted by Article XXI and the Department, the use of stacks exceeding Good Engineering Practice height as defined by regulations promulgated by the US EPA at 40 CFR §§51.100 and 51.110 and Subpart I, and other dispersion techniques, which without reducing the amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise violate the provisions of this Article; except that, for purposes of determining compliance with Article §2104.04 concerning odors, credit for such devices or techniques, except for the use of a masking agent, may be given.

**36. Duty to Supplement and Correct Relevant Facts (§2103.11.d.2)**

- a. The permittee shall provide additional information as necessary to address requirements that become applicable to the source after the date it files a complete application but prior to the Department taking action on the permit application.
- b. The permittee shall provide supplementary fact or corrected information upon becoming aware that incorrect information has been submitted or relevant facts were not submitted.
- c. Except as otherwise required by this permit and Article XXI, the Clean Air Act, or the regulations thereunder, the permittee shall submit additional information as necessary to address changes occurring at the source after the date it files a complete application but prior to the Department taking action on the permit application.
- d. The applicant shall submit information requested by the Department which is reasonably necessary to evaluate the permit application.

**37. Effect (§2102.03.g.)**

- a. Except as specifically otherwise provided under Article XXI, Part C, issuance of a permit pursuant to Article XXI Part B or Part C shall not in any manner relieve any person of the duty to fully

comply with the requirements of this permit, Article XXI or any other provision of law, nor shall it in any manner preclude or affect the right of the Department to initiate any enforcement action whatsoever for violations of this permit or Article XXI, whether occurring before or after the issuance of such permit. Further, except as specifically otherwise provided under Article XXI Part C the issuance of a permit shall not be a defense to any nuisance action, nor shall such permit be construed as a certificate of compliance with the requirements of this permit or Article XXI.

**38. Installation Permits (§2102.04.a.1.)**

It shall be a violation of this permit giving rise to the remedies set forth in Article XXI Part I for any person to install, modify, replace, reconstruct, or reactivate any source or air pollution control equipment which would require an installation permit or permit modification in accordance with Article XXI Part B or Part C.



#### IV. SITE LEVEL TERMS AND CONDITIONS

##### 1. Reporting of Upset Conditions (§2103.12.k.2)

The permittee shall promptly report all deviations from permit requirements, including those attributable to upset conditions as defined in Article XXI §2108.01.c, the probable cause of such deviations, and any corrective actions or preventive measures taken.

##### 2. Visible Emissions (§2104.01.a)

Except as provided for by Article XXI §2108.01.d pertaining to a cold start, no person shall operate, or allow to be operated, any source in such manner that the opacity of visible emissions from a flue or process fugitive emissions from such source, excluding uncombined water:

- a. Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period; or,
- b. Equal or exceed an opacity of 60% at any time.

##### 3. Odor Emissions (§2104.04) (County-only enforceable)

No person shall operate, or allow to be operated, any source in such manner that emissions of malodorous matter from such source are perceptible beyond the property line of such source. In addition, the Department may pursue the remedies provided by §2109.02 for any violation of this Section.

##### 4. Materials Handling (§2104.05)

The permittee shall not conduct, or allow to be conducted, any materials handling operation in such manner that emissions from such operation are visible at or beyond the property line.

##### 5. Operation and Maintenance (§2105.03)

All air pollution control equipment required by this permit or any order under Article XXI, and all equivalent compliance techniques approved by the Department, shall be properly installed, maintained, and operated consistently with good air pollution control practice.

##### 6. Open Burning (§2105.50)

No person shall conduct, or allow to be conducted, the open burning of any material, except where the Department has issued an Open Burning Permit to such person in accordance with Article XXI §2105.50 or where the open burning is conducted solely for the purpose of non-commercial preparation of food for human consumption, recreation, light, ornament, or provision of warmth for outside workers, and in a manner which contributes a negligible amount of air contaminants.

##### 7. Shutdown of Control Equipment (§2108.01.b)

- a. In the event any air pollution control equipment is shut down for reasons other than a breakdown, the person responsible for such equipment shall report, in writing, to the Department the intent to shut down such equipment at least 24 hours prior to the planned shutdown. Notwithstanding the submission of such report, the equipment shall not be shut down until the approval of the

Department is obtained, provided however, that no such report shall be required if the source(s) served by such air pollution control equipment is also shut down at all times that such equipment is shut down.

- b. The Department shall act on all requested shutdowns as promptly as possible. If the Department does not take action on such requests within ten (10) calendar days of receipt of the notice, the request shall be deemed denied, and upon request, the owner or operator of the affected source shall have a right to appeal in accordance with the provisions of Article XXI.
- c. The prior report required by Site Level Condition IV.7.a above shall include:
  - 1) Identification of the specific equipment to be shut down, its location and permit number (if permitted), together with an identification of the source(s) affected;
  - 2) The reasons for the shutdown;
  - 3) The expected length of time that the equipment will be out of service;
  - 4) Identification of the nature and quantity of emissions likely to occur during the shutdown;
  - 5) Measures, including extra labor and equipment, which will be taken to minimize the length of the shutdown, the amount of air contaminants emitted, or the ambient effects of the emissions;
  - 6) Measures which will be taken to shut down or curtail the affected source(s) or the reasons why it is impossible or impracticable to shut down or curtail the affected source(s) during the shutdown; and
  - 7) Such other information as may be required by the Department.
- d. Written notice required by condition IV.7.a above may be emailed to the Department at [aqreports@alleghenycounty.us](mailto:aqreports@alleghenycounty.us) in lieu of mailing a hard copy.

#### 8. Breakdowns (§2108.01.c)

- a. In the event that any air pollution control equipment, process equipment, or other source of air contaminants breaks down in such manner as to have a substantial likelihood of causing the emission of air contaminants in violation of this permit, or of causing the emission into the open air of potentially toxic or hazardous materials, the person responsible for such equipment or source shall immediately, but in no event later than sixty (60) minutes after the commencement of the breakdown, notify the Department of such breakdown and shall, as expeditiously as possible but in no event later than seven (7) days after the original notification, provide written notice to the Department.
- b. To the maximum extent possible, all oral and written notices required shall include all pertinent facts, including:
  - 1) Identification of the specific equipment which has broken down, its location and permit number (if permitted), together with an identification of all related devices, equipment, and other sources which will be affected.
  - 2) The nature and probable cause of the breakdown.
  - 3) The expected length of time that the equipment will be inoperable or that the emissions will continue.
  - 4) Identification of the specific material(s) which are being, or are likely to be emitted, together with a statement concerning its toxic qualities, including its qualities as an irritant, and its potential for causing illness, disability, or mortality.
  - 5) The estimated quantity of each material being or likely to be emitted.

- 6) Measures, including extra labor and equipment, taken or to be taken to minimize the length of the breakdown, the amount of air contaminants emitted, or the ambient effects of the emissions, together with an implementation schedule.
  - 7) Measures being taken to shut down or curtail the affected source(s) or the reasons why it is impossible or impractical to shut down the source(s), or any part thereof, during the breakdown.
- c. Notices required shall be updated, in writing, as needed to advise the Department of changes in the information contained therein. In addition, any changes concerning potentially toxic or hazardous emissions shall be reported immediately. All additional information requested by the Department shall be submitted as expeditiously as practicable.
  - d. Unless otherwise directed by the Department, the Department shall be notified whenever the condition causing the breakdown is corrected or the equipment or other source is placed back in operation by no later than 9:00 AM on the next County business day. Within seven (7) days thereafter, written notice shall be submitted pursuant to Paragraphs a and b above.
  - e. Breakdown reporting shall not apply to breakdowns of air pollution control equipment which occur during the initial startup of said equipment, provided that emissions resulting from the breakdown are of the same nature and quantity as the emissions occurring prior to startup of the air pollution control equipment.
  - f. In no case shall the reporting of a breakdown prevent prosecution for any violation of this permit or Article XXI.
  - g. Written notice required by condition IV.8.a above. Reports may be emailed to the Department at [aqreports@alleghenycounty.us](mailto:aqreports@alleghenycounty.us) in lieu of mailing a hard copy.

#### 9. Cold Start (§2108.01.d)

In the event of a cold start on any fuel-burning or combustion equipment, except stationary internal combustion engines and combustion turbines used by utilities to meet peak load demands, the person responsible for such equipment shall report in writing to the Department the intent to perform such cold start at least 24 hours prior to the planned cold start. Such report shall identify the equipment and fuel(s) involved and shall include the expected time and duration of the startup. Upon written application from the person responsible for fuel-burning or combustion equipment which is routinely used to meet peak load demands and which is shown by experience not to be excessively emissive during a cold start, the Department may waive these requirements and may instead require periodic reports listing all cold starts which occurred during the report period. The Department shall make such waiver in writing, specifying such terms and conditions as are appropriate to achieve the purposes of Article XXI. Such waiver may be terminated by the Department at any time by written notice to the applicant. Cold start notifications may be emailed to the Department at [aqreports@alleghenycounty.us](mailto:aqreports@alleghenycounty.us).

#### 10. Emissions Inventory Statements (§2108.01.e)

- a. Emissions inventory statements in accordance with §2108.01.e shall be submitted to the Department by March 15 of each year for the preceding calendar year. The Department may require more frequent submittals if the Department determines that more frequent submissions are required by the EPA or that analysis of the data on a more frequent basis is necessary to implement the requirements of Article XXI or the Clean Air Act.

- b. The failure to submit any report or update within the time specified, the knowing submission of false information, or the willful failure to submit a complete report shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

#### 11. Orders (§2108.01.f)

In addition to meeting the requirements of General Condition III.26 and Site Level Conditions IV.7 through IV.10 above, inclusive, the person responsible for any source shall, upon order by the Department, report to the Department such information as the Department may require in order to assess the actual and potential contribution of the source to air quality. The order shall specify a reasonable time in which to make such a report.

#### 12. Violations (§2108.01.g)

The failure to submit any report or update thereof required by General Condition III.26 and Site Level Conditions IV.7 through IV.11 above, inclusive, within the time specified, the knowing submission of false information, or the willful failure to submit a complete report shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

#### 13. Emissions Testing (§2108.02)

- a. **Orders:** The person responsible for any source shall, upon order by the Department, conduct, or cause to be conducted, such emissions tests as specified by the Department within such reasonable time as is specified by the Department. Test results shall be submitted in writing to the Department within 20 days after completion of the tests, unless a different period is specified in the Department's order. Emissions testing shall comply with all applicable requirements of Article XXI §2108.02.e.
- b. **Tests by the Department:** Notwithstanding any tests conducted pursuant to this permit, the Department or another entity designated by the Department may conduct emissions testing on any source or air pollution control equipment. At the request of the Department, the permittee shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance of such tests.
- c. **Testing Requirements:** No later than 45 days prior to conducting any tests required by this permit, the person responsible for the affected source shall submit for the Department's approval a written test protocol explaining the intended testing plan, including any deviations from standard testing procedures, the proposed operating conditions of the source during the test, calibration data for specific test equipment and a demonstration that the tests will be conducted under the direct supervision of persons qualified by training and experience satisfactory to the Department to conduct such tests. In addition, at least 30 days prior to conducting such tests, the person responsible shall notify the Department in writing of the time(s) and date(s) on which the tests will be conducted and shall allow Department personnel to observe such tests, record data, provide pre-weighed filters, analyze samples in a County laboratory and to take samples for independent analysis. Test results shall be comprehensively and accurately reported in the units of measurement specified by the applicable emission limitations of this permit.
- d. Test methods and procedures shall conform to the applicable reference method set forth in this permit or Article XXI Part G, or where those methods are not applicable, to an alternative sampling and testing procedure approved by the Department consistent with Article XXI §2108.02.e.2.

- e. **Violations:** The failure to perform tests as required by this permit or an order of the Department, the failure to submit test results within the time specified, the knowing submission of false information, the willful failure to submit complete results, or the refusal to allow the Department, upon presentation of a search warrant, to conduct tests, shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

#### 14. Abrasive Blasting (§2105.51)

- a. Except where such blasting is a part of a process requiring an operating permit, no person shall conduct or allow to be conducted, abrasive blasting or power tool cleaning of any surface, structure, or part thereof, which has a total area greater than 1,000 square feet unless such abrasive blasting complies with all applicable requirements of Article XXI §2105.51.
- b. In addition to complying with all applicable provisions of §2105.51, no person shall conduct, or allow to be conducted, abrasive blasting of any surface unless such abrasive blasting also complies with all other applicable requirements of Article XXI unless such requirements are specifically addressed by §2105.51.

#### 15. Asbestos Abatement (§2105.62, §2105.63)

In the event of removal, encasement, or encapsulation of Asbestos-Containing Material (ACM) at a facility or in the event of the demolition of any facility, the permittee shall comply with all applicable provisions of Article XXI §2105.62 and §2105.63.

#### 16. Permit Source Premises (§2105.40)

- a. **General.** No person shall operate, or allow to be operated, any source for which a permit is required by Article XXI Part C in such manner that emissions from any open land, roadway, haul road, yard, or other premises located upon the source or from any material being transported within such source or from any source-owned access road, haul road, or parking lot over five (5) parking spaces:
- 1) Are visible at or beyond the property line of such source;
  - 2) Have an opacity of 20% or more for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period; or
  - 3) Have an opacity of 60% or more at any time.
- b. **Deposition on Other Premises:** Visible emissions from any solid or liquid material that has been deposited by any means from a source onto any other premises shall be considered emissions from such source within the meaning of Site Level Condition IV.16.a above.

#### 17. Parking Lots and Roadways (§2105.42)

- a. The permittee shall not maintain for use, or allow to be used, any parking lot over 50 parking spaces or used by more than 50 vehicles in any day or any other roadway carrying more than 100 vehicles in any day or 15 vehicles in any hour in such manner that emissions from such parking lot or roadway:
- 1) Are visible at or beyond the property line;
  - 2) Have an opacity of 20% or more for a period or periods aggregating more than three (3) minutes

- in any 60 minute period; or  
3) Have an opacity of 60% or more at any time.

- b. Visible emissions from any solid or liquid material that has been deposited by any means from a parking lot or roadway onto any other premises shall be considered emissions from such parking lot or roadway.
- c. Site Level Condition IV.17.a above shall apply during any repairs or maintenance done to such parking lot or roadway.
- d. Notwithstanding any other provision of this permit, the prohibitions of Site Level Condition IV.17 may be enforced by any municipal or local government unit having jurisdiction over the place where such parking lots or roadways are located. Such enforcement shall be in accordance with the laws governing such municipal or local government unit. In addition, the Department may pursue the remedies provided by Article XXI §2109.02 for any violations of Site Level Condition IV.17.

**18. Permit Source Transport (§2105.43)**

- a. No person shall transport, or allow to be transported, any solid or liquid material outside the boundary line of any source for which a permit is required by Article XXI Part C in such manner that there is any visible emission, leak, spill, or other escape of such material during transport.
- b. Notwithstanding any other provision of this permit, the prohibitions of Site Level Condition IV.18 may be enforced by any municipal or local government unit having jurisdiction over the place where such visible emission, leak, spill, or other escape of material during transport occurs. Such enforcement shall be in accordance with the laws governing such municipal or local government unit. In addition, the Department may pursue the remedies provided by Article XXI §2109.02 for any violation of Site Level Condition IV.18.

**19. Construction and Land Clearing (§2105.45)**

- a. No person shall conduct, or allow to be conducted, any construction or land clearing activities in such manner that the opacity of emissions from such activities:
  - 1) Equal or exceed 20% for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period; or
  - 2) Equal or exceed 60% at any time.
- b. Notwithstanding any other provision of this permit, the prohibitions of Site Level Condition IV.19 may be enforced by any municipal or local government unit having jurisdiction over the place where such construction or land clearing activities occur. Such enforcement shall be in accordance with the laws governing such municipal or local government unit. In addition, the Department may pursue the remedies provided by Article XXI §2109.02 for any violations of Site Level Condition IV.19.

**20. Mining (§2105.46)**

No person shall conduct, or allow to be conducted, any mining activities in such manner that emissions from such activities:

- a. Are visible at or beyond the property line;
- b. Have an opacity of 20% or more for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period; or,
- c. Have an opacity of 60% or more at any time.

**21. Demolition (§2105.47)**

- a. No person shall conduct, or allow to be conducted, any demolition activities in such manner that the opacity of the emissions from such activities equal or exceed 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period.
- b. Notwithstanding any other provisions of this permit, the prohibitions of Site Level Condition IV.21 may be enforced by any municipal or local government unit having jurisdiction over the place where such demolition activities occur. Such enforcement shall be in accordance with the laws governing such municipal or local government unit. In addition, the Department may pursue the remedies provided by Article XXI §2109.02 for any violations of Site Level Condition IV.21.

**22. Fugitive Emissions (§2105.49)**

The person responsible for a source of fugitive emissions, in addition to complying with all other applicable provisions of this permit shall take all reasonable actions to prevent fugitive air contaminants from becoming airborne. Such actions may include, but are not limited to:

- a. The use of asphalt, oil, water, or suitable chemicals for dust control;
- b. The paving and maintenance of roadways, parking lots and the like;
- c. The prompt removal of earth or other material which has been deposited by leaks from transport, erosion or other means;
- d. The adoption of work or other practices to minimize emissions;
- e. Enclosure of the source; and
- f. The proper hooding, venting, and collection of fugitive emissions.

**23. Episode Plans (§2106.02)**

The permittee shall upon written request of the Department, submit a source curtailment plan, consistent with good industrial practice and safe operating procedures, designed to reduce emissions of air contaminants during air pollution episodes. Such plans shall meet the requirements of Article XXI §2106.02.

**24. New Source Performance Standards (§2105.05)**

- a. It shall be a violation of this permit giving rise to the remedies provided by §2109.02 of Article XXI for any person to operate, or allow to be operated, any source in a manner that does not comply with all requirements of any applicable NSPS now or hereafter established by the EPA, except if such person has obtained from EPA a waiver pursuant to Section 111 or Section 129 of the Clean Air Act or is otherwise lawfully temporarily relieved of the duty to comply with such requirements.
- b. Any person who operates, or allows to be operated, any source subject to any NSPS shall conduct, or cause to be conducted, such tests, measurements, monitoring and the like as is required by such standard. All notices, reports, test results and the like as are required by such standard shall be

submitted to the Department in the manner and time specified by such standard. All information, data and the like which is required to be maintained by such standard shall be made available to the Department upon request for inspection and copying.



**V. EMISSION UNIT LEVEL TERMS AND CONDITIONS****A. Process P-001: Scrap Metal Processor**

<b>Process Description:</b>	Scrap Metal Processor (Shredder)
<b>Facility ID:</b>	P-001
<b>Max. Design Rate:</b>	120 tons/hr (240,000 tons,yr)
<b>Raw Materials:</b>	Junk automobiles, appliances and miscellaneous light steel scrap
<b>Control Device:</b>	Cyclone (43,000 cfm) and “Smart Water Injection System”

**1. Restrictions:**

- a. The permittee shall not operate the Shredder unless the “Smart Water Injection System” and the cyclone are in good working order and operating according to the manufacturers’ specifications. (§2105.03, §2103.12.a.2.B)
- b. The permittee shall remove all fuel tanks, refrigeration system equipment, and other such equipment containing volatile organic compounds and other potentially hazardous materials prior to shredding. (§2103.12.a.2.B)
- c. The permittee shall not operate , or allow to be operated, the shredder at the Metalico site in such manner that the opacity of visible emissions from a flue or process fugitive emissions from these facilities, excluding uncombined water: (§2104.01.a)
  - 1) Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period; or
  - 2) Equal or exceed an opacity of 60% at any time.
- d. For the purposes of Conditions V.A.1.e and V.A.1.f below, operation of the shredder shall be defined as any time the load on the shredder motor is greater than or equal to 200 amps. (§2103.12.a.2.B)
- e. The permittee shall not operate the shredder more than ten (10) hours in any calendar day or eight (8) hours per day during Air Quality Action Days as determined by the Allegheny County Health Department (ACHD or Department). (In the Matter of: Metalico Pittsburgh, Inc.; U.S. EPA Docket No. CAA-03-2023-0016DA(D)(42)(a); §2103.12.a.2.B)
- f. The permittee shall not operate the shredder more than 2,000 hours per rolling 12-month period. (In the Matter of: Metalico Pittsburgh, Inc.; U.S. EPA Docket No. CAA-03-2023-0016DA(D)(42)(a) ; §2103.12.a.2.B)
- g. The permittee shall reduce the hours of Facility operation, as needed, to assure that no more than 50 tons of VOCs, per rolling 12-month period, are emitted from the combined emission sources at the Facility. (In the Matter of: Metalico Pittsburgh, Inc.; U.S. EPA Docket No. CAA-03-2023-0016DA(D)(42)(d) ; §2103.12.a.2.B)
- h. The maximum shred feed rate shall not exceed 120 tons per hour. (In the Matter of: Metalico Pittsburgh, Inc.; U.S. EPA Docket No. CAA-03-2023-0016DA(D)(42)(b) ; §2103.12.a.2.B)

- i. The permittee shall not shred more than 240,000 tons of shred feed per rolling 12-month period. (In the Matter of: Metalico Pittsburgh, Inc.; U.S. EPA Docket No. CAA-03-2023-0016DA(D)(42)(c) ; §2103.12.a.2.B)
- j. The Permittee shall use an emission factor of 0.39 lb VOC per ton of shred feed to calculate VOC emissions generated by the Facility Shredder. (In the Matter of: Metalico Pittsburgh, Inc.; U.S. EPA Docket No. CAA-03-2023-0016DA(D)(42)(e) ; §2103.12.a.2.B)
- k. Emissions from P-001 shall not exceed the following at any time: (§2103.12.a.2.B)

**TABLE V-A-1: Shredder Emission Limitations**

<b>POLLUTANT</b>	<b>HOURLY EMISSION LIMIT (lb/hr)</b>	<b>ANNUAL EMISSION LIMIT (tons/year)*</b>
PM	13.06	13.06
PM <sub>10</sub>	13.06	13.06
PM <sub>2.5</sub>	13.06	13.06
VOCs	46.80	46.80
HAPs	1.33	1.33

\* A year is defined as any consecutive 12-month period.

**2. Testing Requirements:**

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 (“Emissions Testing Requirements). (§2103.12.h.1, §2108.02)

**3. Monitoring Requirements:**

- a. The Shredder shall have an amperage monitoring system capable of recording the total time, on a daily basis, that the Shredder operates with an amperage draw equal to or greater than 200 amps. (In the Matter of: Metalico Pittsburgh, Inc.; U.S. EPA Docket No. CAA-03-2023-0016DA(D)(42)(f); 2103.12.i)
- b. The amperage monitoring system shall collect data before, during and after the Shredder’s operation for a minimum of twelve (12) hours per day. (In the Matter of: Metalico Pittsburgh, Inc.; U.S. EPA Docket No. CAA-03-2023-0016DA(D)(42)(f)(i); §2103.12.1)
- c. The permittee shall inspect the incoming material to be shredded to ensure it complies with Condition V.A.1.b above above prior to shredding. (§2103.12.a.2.B, §2103.12.i)
- d. The permittee shall monitor the tons per hour of shred feed on an hourly basis. (§2103.12.a.2.B, §2103.12.i)
- e. The permittee shall observe the opacity of all process and building outlets at the Facility for visible emissions on a daily basis while the process is in operation and in accordance with USEPA

Method 22. If any visible emissions are detected, the permittee shall take action to eliminate the cause of these emissions. (§2103.12.a.2.B, §2103.12.i)

#### 4. Record Keeping Requirements:

- a. The permittee shall record the total number of hours per day in which the Shredder operates at an amperage draw equal to or greater than 200 amps using the Shredder's existing, or a functionally equivalent, amperage monitoring system. (§2103.12.a.2.B, §2103.12.j, In the Matter of: Metalico Pittsburgh, Inc.; U.S. EPA Docket No. CAA-03-2023-0016DA(D)(42)(g))
- b. Data from the amperage monitoring system shall be maintained on a central server so that it can be accessed at both the Facility and Respondent's other offices, to provide to ACHD or EPA upon request. (§2103.12.a.2.B, §2103.12.j, In the Matter of: Metalico Pittsburgh, Inc.; U.S. EPA Docket No. CAA-03-2023-0016DA(D)(42)(h))
- c. A daily written record of the Facility's shredder feed shall be maintained, using both its scale house and product classification process, as assessed upon receipt of all materials arriving at the Facility. (§2103.12.a.2.B, §2103.12.j, In the Matter of: Metalico Pittsburgh, Inc.; U.S. EPA Docket No. CAA-03-2023-0016DA(D)(42)(i))
- d. The permittee shall record the water usage (in gallons) of the Smart Water Injection System. (§2103.12.a.2.B, §2103.12.j)
- e. The permittee shall record the tons per hour of shred feed on an hourly basis. (§2103.12.a.2.B, §2103.12.j)
- f. The permittee shall keep and maintain documentation demonstrating that the requirements of Condition V.A.1.b above have been met. (§2103.12.a.2.B, §2103.12.j)
- g. The permittee shall record the results of inspections, episodes of non-compliance with conditions and corrective actions taken upon occurrence. (§2103.12.a.2.B, §2103.12.j)
- h. All records required under this section shall be maintained by the permittee for a period of five years following the date of such record. (§2103.12.j)

#### 5. Reporting Requirements:

- a. The permittee shall submit semi-annual reports to the Department in accordance with General Condition III.15 above which include the following information: (§2103.12.a.2.B, §2103.12.k)
  - 1) Calendar dates covered in the reporting period;
  - 2) Total hours of operation (monthly, and 12-month);
  - 3) Total hours in which the shredder amps exceeded 200 (weekly, monthly, and 12-month);
  - 4) Total scrap processed (monthly, and 12-month);
  - 5) Reasons for any noncompliance with the emission standards; and
- b. Total monthly scrap processed and total monthly hours of operation, shall be reported to the Department in the semi-annual report required under condition V.A.5.a above. (§2103.12.a.2.B, §2103.12.k)

- c. Reporting instances of non-compliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8 above, if appropriate. (§2103.12.k)

**6. Work Practice Standard:**

- a. The permittee shall maintain on site a Best Management Practice Plan (BMPP). (§2103.12.h.5.D)
  - 1) The BMPP shall be updated annually by March 1<sup>st</sup> of each calendar year.
  - 2) The BMPP shall be made available for inspection and review by Department personnel.
- b. The permittee shall maintain on site a Fire Prevention Plan (FPP). (§2103.12.h.5.D)
  - 1) The FPP shall be updated annually by April 1<sup>st</sup> of each calendar year.
  - 2) The FPP shall be made available for inspection and review by Department personnel.

**B. Process B-001: Waste Derived Fuel Coil Tube Boiler**

**Process Description:** Waste Derived Fuel Boiler - Clean Burn Energy Systems; Model: CB-500-CTB  
**Facility ID:** B-001  
**Max. Design Rate:** 0.50 MMBtu/hr  
**Fuel:** Waste Derived Fuel  
**Control Device:** None

**1. Restrictions:**

- a. Heat input to Boiler B-001 shall be limited to 0.50 MMBtu/hr based on the higher heating value of the fuel being combusted. (§2103.12.a.2.D, IP 0692-I002.V.A.1.a)
- b. Only waste derived fuel that meets the specification set forth in Condition V.B.1.c below shall be combusted in the boiler. (§2103.12.a.2.D, §2105.31.b.3, IP 0692-I002.V.A.1.b)
- c. The fuel specification for the waste derived fuel used in this boiler shall comply with the following limits: (§2103.12.a.2.D, §2105.31.a.1, IP 0692-I002.V.A.1.c)

1) Arsenic	5	ppm	maximum
2) Cadmium	2	ppm	maximum
3) Chromium	10	ppm	maximum
4) Lead	100	ppm	maximum
5) PCBs	5	ppm	maximum
6) Ash	1.2	%	maximum
7) Bottom Sediment and Water	2.0	%	maximum
8) Flash Point	100	degrees F	minimum

- d. The minimum flash point does not apply for if the waste derived fuel is both generated and burned at the this facility. (§2103.12.a.2.D, §2105.31.a.1.A, IP 0692-I002.V.A.1.d)
- e. The maximum allowed ash content is raised to 1.2% for the waste derived fuel. (§2105.31.a.1.D, IP 0692-I002.V.A.1.e)
- f. The exhaust stream from the equipment is vented to a stack with a height that is adequate to ensure that the emissions from the stack do not result in excessive ambient air concentrations of any air pollutant as a result of such things as, but not limited to, atmospheric downwash, wakes or eddy effects created by the source itself, nearby structures, or nearby terrain features. (§2103.12.a.2.D, §2105.31.b.4, IP 0692-I002.V.A.1.f)
- g. The boiler shall have a direct emission reduction of at least 99.0 percent to be determined in accordance with Chapter 14 of the Source Testing Manual. (§2103.12.a.2.D, §2105.31.b.6.A, IP 0692-I002.V.A.1.h)
- h. The waste derived fuel shall meet the following parameters: (§2103.12.a.2.D, §2105.31.a.2, IP 0692-I002.V.A.1.i)

1) Total Halogens	1,000	ppm	maximum
2) Heat of Combustion	18,000	Btu/lb	minimum

- i. Emissions from Boiler B-001 shall not exceed the emissions limitations in Table V-B-1 below. (§2103.12.a.2.D, §2103.20.b.4, IP 0692-I002.V.A.1.k).

**TABLE V-B-1: Waste Derived Fuel Boiler Emission Limitations**

<b>POLLUTANT</b>	<b>HOURLY EMISSION LIMIT (lb/hr)</b>	<b>ANNUAL EMISSION LIMIT (tons/year)*</b>
PM	0.32	1.38
PM <sub>10</sub>	0.25	1.10
PM <sub>2.5</sub>	0.25	1.10
SO <sub>x</sub>	0.21	0.90
NO <sub>x</sub>	0.08	0.34
CO	0.021	0.09
VOCs	0.004	0.018

\* A year is defined as any consecutive 12-month period.

**2. Testing Requirements:**

- a. A representative sample of the fuel being used, shall be taken and analyzed pursuant to Chapter 14 of the Source Testing Manual every 12 months. (§2108.02, §2105.31.b.6.A, IP 0692-I002.V.A.2.a)
- b. Emissions testing shall be performed in accordance with the Site Level Condition IV.13 above “Emissions Testing Requirements”) to confirm that the boiler has a direct emission reduction of 99%. (§2108.02, §2105.31.b.6.A, IP 0692-I002.V.A.2.b)
- c. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Article XXI §2108.02. (§2103.12.h.1, §2108.02, IP 0692-I002.V.A..c)

**3. Monitoring Requirements:**

- a. The permittee shall install the necessary meter(s) to determine the amount of waste derived fuel usage. (§2103.12.a.2.D, §2103.12.i, IP 0692-I002.V.A.3.a)

**4. Record Keeping Requirements:**

- a. The permittee shall record and maintain the following data for the boiler: (§2103.12.j, 40 CFR §63.11225(c)(6)), IP 0692-I002.V.A.4.a)
  - 1) Fuel consumption (monthly, and 12-month);
  - 2) Total operating hours (monthly and 12-month); and
  - 3) Records of operation, maintenance, inspection, calibration and/or replacement of combustion equipment.
- b. The permittee shall maintain on site and submit to the Department, if requested, the following

information regarding the boiler tune-up: (§2103.12.j, 40 CFR §63.11223(b)(6), IP 0692-I002.V.A.4.b)

- 1) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
  - 2) A description of any corrective actions taken as a part of the tune-up of the boiler.
  - 3) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period.
- c. The permittee shall maintain records of the laboratory analysis of the waste derived fuel required under Condition V.B.2.a above. (§2103.12.j, IP 0692-I002.V.A.4.c)
- d. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. (§2103.12.j, IP 0692-I002.V.A.4.d)
- e. Permittee shall maintain all records for at least five (5) years following the date of the record. (2103.12.j, IP 0692-I002.V.A.4.e)

#### 5. Reporting Requirements:

- a. The permittee shall submit semi-annual reports to the Department in accordance with General Condition III.15 above. (§2103.12.k, IP 0692-I002.V.A.5.a)
- b. The semiannual report shall include the following information:(§2103.12.k, IP 0692-I002.V.A.5.b)
- 1) Calendar dates covered in the reporting period; (§2103.12.k)
  - 2) Total waste derived liquid fuel consumed (monthly, and 12-month);
  - 3) A copy of the most recent laboratory analysis of the waste derived fuel required under Condition V.B.2.a above;
  - 4) Records of all cold starts;
  - 5) Reasons for any noncompliance with the emission standards; and
  - 6) A certified statement signed by the responsible official that the records of fuel consumption represent all of the fuel combusted during each the month of the reporting period.
- c. Reporting instances of non-compliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8 above, if appropriate. (§2103.12.k, IP 0692-I002.V.A.5.c)
- d. The permittee shall submit copies of all requested information, reports, applications, submittals, and other communications to the Department upon notification to do so. (§2103.12.k, IP 0692-I002.V.A.5.d)

#### 6. Work Practice Standard:

- a. The permittee shall conduct a tune-up of the boiler every five (5) years as specified in 40 CFR §63.11223 to include the following: (40 CFR §63.11223(e), 40 CFR Part 63 Subpart JJJJJ Table 2 (12), 40 CFR §63.11223(b), IP 0692-I002.V.A.6.a)

- 1) Inspect the burner, and clean or replace any components of the burner as necessary.
  - 2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
  - 3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly
  - 4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
  - 5) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
  - 6) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.
- b. Boiler B-001 shall be: (§2103.12.a.2.D, 40 CFR §63.11205, IP 0692-I002.V.A.b)
- 1) Operated in such a manner as not to cause air pollution;
  - 2) Operated and maintained in a manner consistent with good operating and maintenance practices; and,
  - 3) Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit.



**VI. MISCELLANEOUS****A. Sources of Minor Significance**

I.D.	SOURCE DESCRIPTION	CONTROL DEVICE(S)	MAXIMUM CAPACITY	FUEL/RAW MATERIAL	STACK I.D.
T-001	1,000 gallon On-road Diesel Tank	None	1,000 gal	Diesel Fuel	
T-002	3,000 gallon Off-road Diesel Tank	None	3,000 gal	Diesel Fuel	
T-003	3,000 gallon Off-road Diesel Tank	None	3,000 gal	Diesel Fuel	
T-004	3,000 gallon Used Oil Tank	None	3,000 gal	Used Oil	
T-005	10,000 gallon Off-road Diesel Tank	None	10,000 gal	Diesel Fuel	
T-006	10,000 gallon On-road Diesel Tank	None	10,000 gal	Diesel Fuel	
PW-001	Parts Washer	None	15 – 20 gal	ZEP DYNA 143 solvent	
PW-002	Parts Washer	None	15 – 20 gal	ZEP DYNA 143 solvent	
F-001	Loading Barges and Trucks	Wetting Material		Scrap	
TC-001	Torch Cutting	None		Scrap	

**1. Restrictions:**

- a. The sulfur content of the diesel fuel stored in the aboveground storage tanks shall not exceed 15 ppm (0.0015% sulfur by weight). (§2103.12.a.2.B)
- b. The parts washers shall keep their lids closed when not in use. (§2103.12.a.2.B, §2105.15.a.1)
- c. The permittee shall wet scrap being loaded into barges and trucks, as needed, to minimize fugitive emissions from said operations. (§2103.12.a.2.B)
- d. The permittee shall obtain and maintain on site, fuel receipts and fuel supplier certifications used to demonstrate compliance with the sulfur limits of this permit. Said certifications shall be maintained per shipment and include the following information: (§2103.12.j)
  - 1) The name of the fuel supplier;
  - 2) A statement from the fuel supplier that the oil complies with ASTM D975 “Standard Specification for Diesel Fuel Oils”;
  - 3) The sulfur content of the fuel; and
  - 4) The heating value of the fuel.

## **VII. ALTERNATIVE OPERATING SCENARIOS**

*There are no Alternative Operating Scenarios in this permit.*

**VIII. EMISSIONS LIMITATIONS SUMMARY**

The annual emission limitations for the Metalico Pittsburgh, Inc. facility are summarized in the following table:

**TABLE VIII-1: Emission Limitations Summary**

<b>POLLUTANT</b>	<b>ANNUAL EMISSION LIMIT (tons/year)*</b>
PM	43.64
PM <sub>10</sub>	20.65
PM <sub>2.5</sub>	15.77
SO <sub>x</sub>	0.98
NO <sub>x</sub>	0.34
CO	0.09
VOCs	46.94
HAPs	1.33

\* A year is defined as any consecutive 12-month period.