



Department Decision

Air Quality Synthetic Minor Construction Permit No. 1200-0510-CC

**Adams Scrap Recycling LLC
419 Old Easley Highway
Greenville, South Carolina 29611**

February 15, 2019

In accordance with the 1976 Code of Laws of South Carolina, as amended, including SC Code Section 44-1-60(D), a Department Decision has been made to issue Air Quality Synthetic Minor Construction Permit No. 1200-0510-CC to the above-named permittee. This permit was previously placed on public notice and open for public comment from July 10, 2018, through August 8, 2018. A community meeting was held by SC DHEC's Bureau of Air Quality on October 18, 2018, and the comment period was extended until October 26, 2018. Adverse public comments were received by SC DHEC during the comment period. Comments received during the formal comment period regarding air quality issues have been addressed in SC DHEC's *Responses to Comments on Air Quality* document attached to this Department Decision. SC DHEC's decision to issue this permit has been made after consideration and a complete review of the following: the air permit application, applicable state and federal air quality regulations, comments and concerns made at the community meeting and all other comments received within the required time frame, and all other pertinent information.

This Department Decision regarding Air Quality Synthetic Minor Construction Permit No. 1200-0510-CC includes the following; a) the issued permit (Attachment A) which meets the requirements of all applicable air quality regulations; b) a summary of the project, permit, and applicable regulations as outlined in the Statement of Basis (Attachment B); and c) a summary of the comments made by concerned citizens regarding air quality issues and responses by the Bureau of Air Quality, as outlined in the *Responses to Comments on Air Quality Permit No. 1200-0510-CC* (Attachment C). This Department Decision (including attachments) will be included in SC DHEC's administrative record for this permit decision.

**Steve McCaslin, P. E., Director
Air Permitting Division
Bureau of Air Quality**

Attachment A

**Air Quality Synthetic Minor Construction
Permit No. 1200-0510-CC**



Bureau of Air Quality Synthetic Minor Construction Permit

**Adams Scrap Recycling LLC
419 Old Easley Highway
Greenville, South Carolina 29611
Greenville County**

In accordance with the provisions of the Pollution Control Act, Sections 48-1-50(5), 48-1-100(A), and 48-1-110(a), the 1976 Code of Laws of South Carolina, as amended, and South Carolina Regulation 61-62, Air Pollution Control Regulations and Standards, the Bureau of Air Quality authorizes the construction of this facility and the equipment specified herein in accordance with the plans, specifications, and other information submitted in the construction permit application received on April 26, 2018, as amended. All official correspondence, plans, permit applications, and written statements are an integral part of the permit. Any false information or misrepresentation in the application for a construction permit may be grounds for permit revocation.

The construction and subsequent operation of this facility is subject to and conditioned upon the terms, limitations, standards, and schedules contained herein or as specified by this permit and its accompanying attachments.

Permit Number: 1200-0510-CC
Issue Date: February 15, 2019

**Steve McCaslin, P. E., Director
Air Permitting Division
Bureau of Air Quality**

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RECORD OF REVISIONS	
Date	Description of Changes

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A. PROJECT DESCRIPTION

Permission is hereby granted to install a natural gas fired Secondary Aluminum processing rotary melting furnace with Baghouse with Lime Injection.

B.1 EQUIPMENT

Equipment ID	Equipment Description	Control Device ID	Emission Point ID
RF	5.0 Million BTU/hr natural gas fired Secondary Aluminum processing rotary melting furnace to melt scrap aluminum. The rotary furnace is controlled by baghouse with lime injection system.	BH	BH1

B.2 CONTROL DEVICES

Control Device ID	Control Device Description	Pollutant(s) Controlled
BH	20,000 CFM Baghouse with lime injection to control emissions from melting furnace	Baghouse (PM/PM ₁₀ /PM _{2.5}), Lime Injection (HCL)

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
C.1	Equipment ID: All Control Device ID: All (S.C. Regulation 61-62.1, Section II.J.1.g) A copy of the Department issued construction and/or operating permit must be kept readily available at the facility at all times. The owner or operator shall maintain such operational records; make reports; install, use, and maintain monitoring equipment or methods; sample and analyze emissions or discharges in accordance with prescribed methods at locations, intervals, and procedures as the Department shall prescribe; and provide such other information as the Department reasonably may require. All records required to demonstrate compliance with the limits established under this permit shall be maintained on site for a period of at least 5 years from the date the record was generated and shall be made available to a Department representative upon request.

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C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
C.2	<p>Equipment ID: RF Control Device ID: BH</p> <p>The owner/operator shall inspect, calibrate, adjust, and maintain continuous monitoring systems, monitoring devices, and gauges in accordance with manufacturer’s specifications or good engineering practices. The owner/operator shall maintain on file all measurements including continuous monitoring system or monitoring device performance measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required in a permanent form suitable for inspection by Department personnel.</p>
C.3	<p>Equipment ID: RF Control Device ID: BH</p> <p>All gauges shall be readily accessible and easily read by operating personnel and Department personnel (i.e. on ground level or easily accessible roof level). Monitoring parameter readings (i.e., pressure drop readings, etc.) and inspection checks shall be maintained in logs (written or electronic), along with any corrective action taken when deviations occur. Each incidence of operation outside the operational ranges, including date and time, cause, and corrective action taken, shall be recorded and kept on site. Exceedance of operational range shall not be considered a violation of an emission limit of this permit, unless the exceedance is also accompanied by other information demonstrating that a violation of an emission limit has taken place. Reports of these incidences shall be submitted monthly for the first twelve months from initial start-up then semiannually. If no incidences occurred during the reporting period then a letter shall be submitted to indicate such.</p> <p>Any alternative method for monitoring control device performance must be preapproved by the Department and shall be incorporated into the permit as set forth in S.C. Regulation 61-62.1 Section II.</p>
C.4	<p>Equipment ID: RF Control Device ID: BH</p> <p>(S.C. Regulation 61-62.5, Standard No. 4, Section VIII) Particulate matter emissions shall be limited to the rate specified by use of the following equations:</p> <p style="padding-left: 40px;">For process weight rates less than or equal to 30 tons per hour $E = (F) 4.10P^{0.67}$ and</p> <p style="padding-left: 40px;">For process weight rates greater than 30 tons per hour $E = (F) 55.0P^{0.11} - 40$</p> <p style="padding-left: 40px;">Where E = the allowable emission rate in pounds per hour P = process weight rate in tons per hour F = effect factor from Table B in S.C. Regulation 61-62.5, Standard No. 4</p> <p>For the purposes of compliance with this condition, the process boundaries are defined as follows:</p>

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C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions				
	<table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse;"> <thead> <tr style="background-color: #e0e0e0;"> <th style="text-align: center;">Process/Equipment IDs</th> <th style="text-align: center;">Max Process Weight Rate (ton/hr)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">RF</td> <td style="text-align: center;">2.75</td> </tr> </tbody> </table> <p>(S.C. Regulation 61-62.5, Standard No. 4, Section IX) Where construction or modification began after December 31, 1985, emissions from these sources (including fugitive emissions) shall not exhibit an opacity greater than 20% each.</p> <p>This melting furnace is permitted to burn only natural gas as fuel. The use of any other substances as fuel is prohibited without prior written approval from the Department.</p> <p>BH - The owner/operator shall continue to operate and maintain pressure drop gauge(s) on each module of the baghouse. Pressure drop readings shall be recorded daily during source operation. Operation and maintenance checks shall be made on at least a weekly basis for baghouse cleaning systems, dust collection hoppers, and conveying systems for proper operation. The baghouse shall be in place and operational whenever processes controlled by it are running, except during periods of baghouse malfunction or mechanical failure.</p> <p>All gauges shall be readily accessible and easily read by operating personnel and Department personnel (i.e. on ground level or easily accessible roof level). Monitoring parameter readings (i.e., pressure drop readings, etc.) and inspection checks shall be maintained in logs (written or electronic), along with any corrective action taken when deviations occur. Each incidence of operation outside the operational ranges, including date and time, cause, and corrective action taken, shall be recorded and kept on site. Exceedance of operational range shall not be considered a violation of an emission limit of this permit, unless the exceedance is also accompanied by other information demonstrating that a violation of an emission limit has taken place. Reports of these incidences shall be submitted monthly for the first twelve months from initial start-up then semiannually. If no incidences occurred during the reporting period then a letter shall be submitted to indicate such.</p> <p>Any alternative method for monitoring control device performance must be preapproved by the Department and shall be incorporated into the permit as set forth in S.C. Regulation 61-62.1 Section II.</p> <p>Operational ranges for the monitored parameters shall be established to ensure proper operation of the pollution control equipment. These operational ranges for the monitored parameters shall be derived from stack test data, vendor certification, and/or operational history and visual inspections, which demonstrate the proper operation of the equipment. These ranges and supporting documentation (certification from manufacturer, stack test results, 30 days of normal readings, opacity readings, etc.) shall be submitted to the Director of Engineering Services within 180 days of startup. Operating ranges may be updated following submittal to the Department.</p>	Process/Equipment IDs	Max Process Weight Rate (ton/hr)	RF	2.75
Process/Equipment IDs	Max Process Weight Rate (ton/hr)				
RF	2.75				

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C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
C.5	<p>Equipment ID: Facility-Wide Control Device ID: Facility-Wide</p> <p>(S.C. Regulation 61-62.1, Section II.E; S.C. Regulation 61-62.1, Section II.G) This facility is a potential major source for hazardous air pollutants (HAP) emissions. The facility has agreed to federally enforceable operating limitations to limit its potential to emit to less than 10.0 tons per year for any single HAP and 25.0 tons per year for any combination of HAPs to avoid Title V and to remain an area source of HAPs.</p> <p>The owner/operator shall maintain records of all hazardous air pollutants (HAP). These records shall include the total amount of each material used, the HAP content in percent by weight of each material, and any other records necessary to determine HAP emissions. HAP emissions shall be calculated on a monthly basis, and a twelve-month rolling sum shall be calculated for individual HAP, and total HAP emissions. Emissions from malfunctions are required to be quantified and included in the calculations. The twelve-month rolling sum shall be less than 10.0 tons for a single HAP, and less than 25.0 tons for total HAPs. Reports of the calculated values and the twelve-month rolling sum, calculated for each month in the reporting period, shall be submitted monthly for the first twelve months from initial start-up then semi-annually.</p> <p>An algorithm, including example calculations and emission factors, explaining the method used to determine emission rates shall only be included in the initial report. Subsequent submittals of the algorithm are required within 30 days of the change if the algorithm or basis for emissions is modified or the Department requests additional information.</p>
C.6	<p>Equipment ID: Facility-Wide Control Device ID: Facility-Wide</p> <p>(S.C. Regulation 61-62.1, Section II.E; S.C. Regulation 61-62.1, Section II.G) This facility is a potential major source for PM₁₀ emissions. The facility has agreed to federally enforceable operating limitations to limit its potential to emit to less than 100.0 tons per year for PM₁₀ emissions to avoid Title V.</p> <p>The owner/operator shall maintain production records and any other records necessary to determine facility wide PM₁₀ emissions. PM₁₀ emissions shall be calculated on a monthly basis, and a twelve month rolling sum shall be calculated for total PM₁₀ emissions. Emissions from malfunctions are required to be quantified and included in the calculations. The twelve month rolling sum shall be less than 100.0 tons. Reports of the calculated values and the twelve-month rolling sum, calculated for each month in the reporting period, shall be submitted monthly for the first twelve months from initial start-up then semiannually.</p> <p>An algorithm, including example calculations and emission factors, explaining the method used to determine emission rates shall only be included in the initial report. Subsequent submittals of the</p>

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C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
	algorithm are required within 30 days of the change if the algorithm or basis for emissions is modified or the Department requests additional information.
C.7	<p>Equipment ID: Facility-Wide Control Device ID: Facility-Wide</p> <p>(S.C. Regulation 61-62.6) Fugitive particulate matter (PM) emissions from material handling, process equipment, control equipment, or storage piles will be minimized to the maximum extent possible. This will include proper maintenance of the control system such as scheduled inspections, replacement of damaged or worn parts, etc. Fugitive emissions from dust buildup will be controlled by proper housekeeping and/or wet suppression.</p>
C.8	<p>Equipment ID: RF Control Device ID: BH</p> <p>The facility is permitted to melt only aluminum scrap known by the owner or operator. No painted or coated aluminum extrusions are to be melted. The following scrap maybe melted when prepared as follows:</p> <p>Aluminum Engines Engines are to have minimal paint/dirt on them, engine oil shall be removed with little or no oil remaining, filter removed, wiring harnesses removed with little or no excess wire remaining, hoses removed with little or no excess hose remaining.</p> <p>Aluminum Transmissions Transmissions are to have minimal dirt on them, the fluid removed, torque converter removed, wiring harnesses removed with little or no excess wire remaining, hoses removed with little or no excess hose remaining.</p> <p>Aluminum Engine Parts Aluminum Engine Parts are to have minimal dirt and oil on them.</p> <p>Aluminum Wheels Aluminum Wheels are to be free of tires and minimal amounts of dirt on them.</p> <p>The owner or operator must contact the Bureau of Air Quality to obtain approval to melt any other aluminum scrap.</p>

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C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
C.9	<p>Equipment ID: RF Control Device ID: BH</p> <p>The owner or operator shall make records of each of the following daily and submit reports of all such records on a monthly basis for the first twelve months from initial start-up then semiannually.</p> <ul style="list-style-type: none"> a. Date and Time of each charge b. Weight of each charge c. Makeup of the charge to insure it meets the allowed scrap d. Baghouse inlet temperature shall be recorded as 15-minute block averages and 3-hour block averages. e. Lime injection rate setting once per day f. Inspect lime feed hopper/silo at least once each 8-hour period and recording the results of each inspection to include any corrective action taken. If lime is found not to be free-flowing during any of the 8-hour periods, the owner or operator must increase the frequency of inspections to at least once every 4-hour period for the next 3 days. The owner or operator may return to inspections at least once every 8 hour period if corrective action results in no further blockages of lime during the 3-day period. g. Total reactive flux rate for each batch
C.10	<p>Facility Wide</p> <p>The owner or operator shall comply with S.C. Regulation 61-62.2 "Prohibition of Open Burning."</p>

D. NESHAP PERIODIC REPORTING SCHEDULE SUMMARY

NESHAP Part	NESHAP Subpart	Compliance Monitoring Report Submittal Frequency	Reporting Period	Report Due Date
63	RRR	Semi-Annual	January 1 through June 30 July 1 through December 31	60 days after June 30 th and December 31 st

1. This table summarizes only the periodic compliance reporting schedule. Additional reports may be required. See specific NESHAP Subpart for additional reporting requirements and associated schedule.
2. This reporting schedule does not supersede any other reporting requirements including but not limited to 40 CFR Part 60, 40 CFR Part 61, 40 CFR Part 63, and/or Title V. The MACT reporting schedule may be adjusted to coincide with the Title V reporting schedule with prior approval from the Department in accordance with 40 CFR 63.10(a)(5). This request may be made 1 year after the compliance date for the associated MACT standard.

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E. NESHAP – CONDITIONS

Condition Number	Conditions
E.1	All NESHAP notifications and reports shall be sent to the Manager of the Air Toxics Section, South Carolina Department of Health and Environmental Control - Bureau of Air Quality.
E.2	All NESHAP notifications and the cover letter to periodic reports shall be sent to the United States Environmental Protection Agency (US EPA) at the following address or electronically as required by the specific subpart: <p style="text-align: center;">US EPA, Region 4 Air, Pesticides and Toxics Management Division 61 Forsyth Street SW Atlanta, GA 30303</p>
E.3	This facility has processes subject to the provisions of S.C. Regulation 61-62.63 and 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants, Subparts A and RRR, National Emission Standards For Hazardous Air Pollutants For Secondary Aluminum Production. Existing affected sources shall be in compliance with the requirements of these Subparts by the compliance date, unless otherwise noted. Any new affected sources shall comply with the requirements of these Subparts upon initial start-up unless otherwise noted.
E.4	<u>Emission Limits</u> A. <u>Dioxin/Furans (63.1505(i)(3))</u> (3) 15 µg of D/F TEQ per Mg (2.1×10^{-4} gr of D/F TEQ per ton) of feed/charge from a group 1 furnace at a secondary aluminum production facility that is a major or area source. This limit does not apply if the furnace processes only clean charge;
E.5	<u>Operating Requirements</u> A. <u>Labeling (63.1506(b)(1) and (2))</u> (b) <i>Labeling.</i> The owner or operator must provide and maintain easily visible labels posted at each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln that identifies the applicable emission limits and means of compliance, including: (1) The type of affected source or emission unit (<i>e.g.</i> , scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, in-line fluxer). (2) The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (<i>e.g.</i> , clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the OM&M plan. B. <u>Capture and Control System (63.1506 (c) (1), (2), and (3))</u> (c) <i>Capture/collection systems.</i> For each affected source or emission unit equipped with an add-

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E. NESHAP – CONDITIONS

Condition Number	Conditions
	<p>on air pollution control device, the owner or operator must:</p> <ul style="list-style-type: none">(1) Design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates or facial inlet velocities as contained in the ACGIH Guidelines (incorporated by reference, see §63.14);(2) Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter; and(3) Operate each capture/collection system according to the procedures and requirements in the OM&M plan. <p>C. <u>Feed/Charge Weight (63.1506(d))</u></p> <p>(d) <i>Feed/charge weight.</i> The owner or operator of each affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) or µg/Mg (gr/ton) of feed/charge must:</p> <ul style="list-style-type: none">(1) Except as provided in paragraph (d)(3) of this section, install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test; and(2) Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.(3) The owner or operator may choose to measure and record aluminum production weight from an affected source or emission unit rather than feed/charge weight to an affected source or emission unit, provided that:<ul style="list-style-type: none">(i) The aluminum production weight, rather than feed/charge weight is measured and recorded for all emission units within a SAPU; and(ii) All calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight. <p>D. <u>Group I Furnace with Add-on Control Device (63.1506(m)(1),(3),(4),(5) and (7))</u></p> <p>(m) <i>Group 1 furnace with add-on air pollution control devices.</i> The owner or operator of a group 1 furnace with emissions controlled by a lime-injected fabric filter must:</p> <ul style="list-style-type: none">(1) If a bag leak detection system is used to meet the monitoring requirements in §63.1510, the

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E. NESHAP – CONDITIONS

Condition Number	Conditions
	<p>owner or operator must:</p> <ul style="list-style-type: none">(i) Initiate corrective action within 1 hour of a bag leak detection system alarm.(ii) Complete the corrective action procedures in accordance with the OM&M plan.(iii) Operate each fabric filter system such that the bag leak detection system alarm does not sound more than 5 percent of the operating time during a 6-month block reporting period. In calculating this operating time fraction, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted. If corrective action is required, each alarm shall be counted as a minimum of 1 hour. If the owner or operator takes longer than 1 hour to initiate corrective action, the alarm time shall be counted as the actual amount of time taken by the owner or operator to initiate corrective action. <p>(m)(3) Maintain the 3-hour block average inlet temperature for each fabric filter at or below the average temperature established during the performance test, plus 14°C (plus 25°F).</p> <p>(m)(4) For a continuous lime injection system, maintain free-flowing lime in the hopper to the feed device at all times and maintain the lime feeder setting at or above the level established during the performance test.</p> <p>(m)(5) Maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test.</p> <p>(m)(7) The operation of capture/collection systems and control devices associated with natural gas-fired, propane-fired or electrically heated group 1 furnaces that will be idled for at least 24 hours after the furnace cycle has been completed may be temporarily stopped. Operation of these capture/collection systems and control devices must be restarted before feed/charge, flux or alloying materials are added to the furnace.</p> <p>E. <u>Corrective Action (63.1506(p))</u></p> <p>(p) <i>Corrective action.</i> When a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the performance test and incorporated in the OM&M plan, the owner or operator must initiate corrective action. Corrective action must restore operation of the affected source or emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.</p>

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E. NESHAP – CONDITIONS

Condition Number	Conditions
E.6	<p><u>Monitoring Requirements</u></p> <p>A. <u>OM&M Plan (63.1510(b))</u></p> <p>(b) <i>Operation, maintenance, and monitoring (OM&M) plan.</i> The owner or operator must prepare and implement for each new or existing affected source and emission unit, a written OM&M plan. The owner or operator of an existing affected source must submit the OM&M plan to the permitting authority for major sources, or the Administrator for area sources no later than the compliance date established by §63.1501. The owner or operator of any new affected source must submit the OM&M plan to the permitting authority for major sources, or the Administrator for area sources within 90 days after a successful initial performance test under §63.1511(b), or within 90 days after the compliance date established by §63.1501 if no initial performance test is required. The plan must be accompanied by a written certification by the owner or operator that the OM&M plan satisfies all requirements of this section and is otherwise consistent with the requirements of this subpart. The owner or operator must comply with all of the provisions of the OM&M plan as submitted to the permitting authority for major sources, or the Administrator for area sources, unless and until the plan is revised in accordance with the following procedures. If the permitting authority for major sources, or the Administrator for area sources determines at any time after receipt of the OM&M plan that any revisions of the plan are necessary to satisfy the requirements of this section or this subpart, the owner or operator must promptly make all necessary revisions and resubmit the revised plan. If the owner or operator determines that any other revisions of the OM&M plan are necessary, such revisions will not become effective until the owner or operator submits a description of the changes and a revised plan incorporating them to the permitting authority for major sources, or the Administrator for area sources. Each plan must contain the following information:</p> <ol style="list-style-type: none"> (1) Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device. (2) A monitoring schedule for each affected source and emission unit. (3) Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in §63.1505. (4) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including: <ol style="list-style-type: none"> (i) Calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and (ii) Procedures for the quality control and quality assurance of continuous emission or opacity

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E. NESHAP – CONDITIONS

Condition Number	Conditions
	<p>monitoring systems as required by the general provisions in subpart A of this part.</p> <p>(5) Procedures for monitoring process and control device parameters, including lime injection rates, procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.</p> <p>(6) Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in paragraph (b)(1) of this section, including:</p> <p>(i) Procedures to determine and record the cause of any deviation or excursion, and the time the deviation or excursion began and ended;</p> <p>(7) A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.</p> <p>B. <u>Labeling (63.1510(c))</u></p> <p>(c) <i>Labeling.</i> The owner or operator must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels as required by the operational standard in §63.1506(b) are intact and legible.</p> <p>C. <u>Capture/Collection System (63.1510(d))</u></p> <p>(d) <i>Capture/collection system.</i> The owner or operator must:</p> <p>(1) Install, operate, and maintain a capture/collection system for each affected source and emission unit equipped with an add-on air pollution control device; and</p> <p>(2) Inspect each capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements in §63.1506(c) and record the results of each inspection. This inspection shall include a volumetric flow rate measurement taken at a location in the ductwork downstream of the hoods that is representative of the actual volumetric flow rate without interference due to leaks, ambient air added for cooling or ducts from other hoods. The flow rate measurement must be performed in accordance with paragraphs (d)(2)(i), (ii), or (iii) of this section. As an alternative to the flow rate measurement specified in this paragraph, the inspection may satisfy the requirements of this paragraph, including the operating requirements in §63.1506(c), by including permanent total enclosure verification in accordance with paragraph (d)(2)(i) or (iv) of this section. Inspections that fail to successfully demonstrate that the requirements of §63.1506(c) are met, must be followed by repair or adjustment</p>

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	<p>to the system operating conditions and a follow up inspection within 45 days to demonstrate that §63.1506(c) requirements are fully met.</p> <p>(i) Conduct annual flow rate measurements using EPA Methods 1 and 2 in appendix A to 40 CFR part 60, or conduct annual verification of a permanent total enclosure using EPA Method 204; or you may follow one of the three alternate procedures described in paragraphs (ii), (iii), or (iv) of this section to maintain system operations in accordance with an operating limit established during the performance test. The operating limit is determined as the average reading of a parametric monitoring instrument (Magnehelic®, manometer, anemometer, or other parametric monitoring instrument) and technique as described in paragraphs (d)(2)(ii), (iii), and (iv) of this section. A deviation, as defined in paragraphs (ii), (iii), and (iv) of this section, from the parametric monitoring operating limit requires the owner or operator to make repairs or adjustments to restore normal operation within 45 days.</p> <p>(ii) As an alternative to annual flow rate measurements using EPA Methods 1 and 2, measurement with EPA Methods 1 and 2 can be performed once every 5 years, provided that:</p> <p>(A) A flow rate indicator consisting of a pitot tube and differential pressure gauge (Magnehelic®, manometer or other differential pressure gauge) is installed with the pitot tube tip located at a representative point of the duct proximate to the location of the Methods 1 and 2 measurement site; and</p> <p>(B) The flow rate indicator is installed and operated in accordance with the manufacturer's specifications; and</p> <p>(C) The differential pressure is recorded during the Method 2 performance test series; and</p> <p>(D) Daily differential pressure readings are made by taking three measurements with at least 5 minutes between each measurement and averaging the three measurements; and readings are recorded daily and maintained at or above 90 percent of the average pressure differential indicated by the flow rate indicator during the most recent Method 2 performance test series; and</p> <p>(E) An inspection of the pitot tube and associated lines for damage, plugging, leakage and operational integrity is conducted at least once per year; or</p> <p>(iii) As an alternative to annual flow rate measurements using EPA Methods 1 and 2, measurement with EPA Methods 1 and 2 can be performed once every 5 years, provided that:</p> <p>(A) Daily measurements of the capture and collection system's fan revolutions per minute (RPM) or fan motor amperage (amps) are made by taking three measurements with at least 5 minutes between each measurement, and averaging the three measurements; and readings are recorded</p>

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	<p>daily and maintained at or above 90 percent of the average RPM or amps measured during the most recent Method 2 performance test series; or</p> <p>(B) A static pressure measurement device is installed in the duct immediately downstream of the hood exit, and daily pressure readings are made by taking three measurements with at least 5 minutes between each measurement, and averaging the three measurements; and readings are recorded daily and maintained at 90 percent or better of the average vacuum recorded during the most recent Method 2 performance test series; or</p> <p>(C) A hotwire anemometer, ultrasonic flow meter, cross-duct pressure differential sensor, venturi pressure differential monitoring or orifice plate equipped with an associated thermocouple and automated data logging software and associated hardware is installed; and daily readings are made by taking three measurements with at least 5 minutes between each measurement, and averaging the three measurements; and readings are recorded daily and maintained at 90 percent or greater of the average readings during the most recent Method 2 performance test series; or</p> <p>(D) For booth-type hoods, hotwire anemometer measurements of hood face velocity are performed simultaneously with EPA Method 1 and 2 measurements, and the annual hood face velocity measurements confirm that the enclosure draft is maintained at 90 percent or greater of the average readings during the most recent Method 2 performance test series. Daily readings are made by taking three measurements with at least 5 minutes between each measurement, and averaging the three measurements; and readings are recorded daily and maintained at 90 percent or greater of the average readings during the most recent Method 1 and 2 performance test series.</p> <p>(iv) As an alternative to the annual verification of a permanent total enclosure using EPA Method 204, verification can be performed once every 5 years, provided that:</p> <p>(A) Negative pressure in the enclosure is directly monitored by a pressure indicator installed at a representative location;</p> <p>(B) Pressure readings are recorded daily or the system is interlocked to halt material feed should the system not operate under negative pressure;</p> <p>(C) An inspection of the pressure indicator for damage and operational integrity is conducted at least once per calendar year.</p> <p>D. <u>Feed Charge Weight (63.1510(e))</u></p> <p>(e) <i>Feed/charge weight.</i> The owner or operator of an affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) or µg/Mg (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum</p>

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	<p>production from, the affected source or emission unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emission unit-by-emission unit basis. As an alternative to a measurement device, the owner or operator may use a procedure acceptable to the permitting authority for major sources, or the Administrator for area sources to determine the total weight of feed/charge or aluminum production to the affected source or emission unit.</p> <p>(1) The accuracy of the weight measurement device or procedure must be 1 percent of the weight being measured. The owner or operator may apply to the permitting agency for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standard.</p> <p>(2) The owner or operator must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.</p> <p>E. <u>Baghouse Monitoring (63.1510(f))</u></p> <p>(f) <i>Fabric filters and lime-injected fabric filters.</i> The owner or operator of an affected source or emission unit using a fabric filter or lime-injected fabric filter to comply with the requirements of this subpart must install, calibrate, maintain, and continuously operate a bag leak detection system as required in paragraph (f)(1) of this section or a continuous opacity monitoring system as required in paragraph (f)(2) of this section. The owner or operator of an aluminum scrap shredder must install and operate a bag leak detection system as required in paragraph (f)(1) of this section, install and operate a continuous opacity monitoring system as required in paragraph (f)(2) of this section, or conduct visible emission observations as required in paragraph (f)(3) of this section.</p> <p>(1) These requirements apply to the owner or operator of a new or existing affected source or existing emission unit using a bag leak detection system.</p> <p>(i) The owner or operator must install and operate a bag leak detection system for each exhaust stack of a fabric filter.</p> <p>(ii) Each bag leak detection system must be installed, calibrated, operated, and maintained according to the manufacturer's operating instructions.</p> <p>(iii) The bag leak detection system must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 10 milligrams per actual cubic meter (0.0044 grains per</p>

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	<p>actual cubic foot) or less.</p> <p>(iv) The bag leak detection system sensor must provide output of relative or absolute PM loadings.</p> <p>(v) The bag leak detection system must be equipped with a device to continuously record the output signal from the sensor.</p> <p>(vi) The bag leak detection system must be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm must be located where it is easily heard by plant operating personnel.</p> <p>(vii) For positive pressure fabric filter systems, a bag leak detection system must be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector must be installed downstream of the fabric filter.</p> <p>(viii) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.</p> <p>(ix) The baseline output must be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time.</p> <p>(x) Following initial adjustment of the system, the owner or operator must not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the OM&M plan. In no case may the sensitivity be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition.</p> <p>F. <u>Baghouse Inlet Temperature (63.1510(h))</u></p> <p>(h) <i>Fabric filter inlet temperature.</i> These requirements apply to the owner or operator of a scrap dryer/delacquering kiln/decoating kiln or a group 1 furnace using a lime-injected fabric filter to comply with the requirements of this subpart.</p> <p>(1) The owner or operator must install, calibrate, maintain, and operate a device to continuously monitor and record the temperature of the fabric filter inlet gases consistent with the requirements for continuous monitoring systems in subpart A of this part.</p> <p>(2) The temperature monitoring device must meet each of these performance and equipment specifications:</p>

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	<p>(i) The monitoring system must record the temperature in 15-minute block averages and calculate and record the average temperature for each 3-hour block period.</p> <p>(ii) The recorder response range must include zero and 1.5 times the average temperature established according to the requirements in §63.1512(n).</p> <p>(iii) The reference method must be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference, subject to approval by the Administrator.</p> <p>G. <u>Lime Injection (63.1510(i))</u></p> <p>(i) <i>Lime injection.</i> These requirements apply to the owner or operator of an affected source or emission unit using a lime-injected fabric filter to comply with the requirements of this subpart.</p> <p>(1) The owner or operator of a continuous lime injection system must verify that lime is always free-flowing by either:</p> <p>(i) Inspecting each feed hopper or silo at least once each 8-hour period and recording the results of each inspection. If lime is found not to be free-flowing during any of the 8-hour periods, the owner or operator must increase the frequency of inspections to at least once every 4-hour period for the next 3 days. The owner or operator may return to inspections at least once every 8 hour period if corrective action results in no further blockages of lime during the 3-day period; or</p> <p>(ii) Subject to the approval of the permitting agency, installing, operating and maintaining a load cell, carrier gas/lime flow indicator, carrier gas pressure drop measurement system or other system to confirm that lime is free-flowing. If lime is found not to be free-flowing, the owner or operator must promptly initiate and complete corrective action, or</p> <p>(iii) Subject to the approval of the permitting agency, installing, operating and maintaining a device to monitor the concentration of HCl at the outlet of the fabric filter. If an increase in the concentration of HCl indicates that the lime is not free-flowing, the owner or operator must promptly initiate and complete corrective action.</p> <p>(2) The owner or operator of a continuous lime injection system must record the lime feeder setting once each day of operation.</p> <p>(3) An owner or operator who intermittently adds lime to a lime-injected fabric filter must obtain approval from the permitting authority for major sources, or the Administrator for area sources for a lime addition monitoring procedure. The permitting authority for major sources, or the Administrator for area sources will not approve a monitoring procedure unless data and information</p>

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	<p>are submitted establishing that the procedure is adequate to ensure that relevant emission standards will be met on a continuous basis.</p> <p>(4) At least once per month, verify that the lime injection rate in pounds per hour (lb/hr) is no less than 90 percent of the lime injection rate used to demonstrate compliance during your most recent performance test. If the monthly check of the lime injection rate is below the 90 percent, the owner or operator must repair or adjust the lime injection system to restore normal operation within 45 days. The owner or operator may request from the permitting authority for major sources, or the Administrator for area sources, an extension of up to an additional 45 days to demonstrate that the lime injection rate is no less than 90 percent of the lime injection rate used to demonstrate compliance during the most recent performance test. In the event that a lime feeder is repaired or replaced, the feeder must be calibrated, and the feed rate must be restored to the lb/hr feed rate operating limit established during the most recent performance test within 45 days. The owner or operator may request from the permitting authority for major sources, or the Administrator for area sources, an extension of up to an additional 45 days to complete the repair or replacement and establishing a new setting. The repair or replacement, and the establishment of the new feeder setting(s) must be documented in accordance with the recordkeeping requirements of §63.1517.</p> <p>H. <u>Total Reactive Flux Injection Rate (63.1510(j))</u></p> <p>(j) <i>Total reactive flux injection rate.</i> These requirements apply to the owner or operator of a group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer. The owner or operator must:</p> <p>(1) Install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emission unit.</p> <p>(i) The monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.</p> <p>(ii) The accuracy of the weight measurement device must be ±1 percent of the weight of the reactive component of the flux being measured. The owner or operator may apply to the permitting authority for major sources, or the Administrator for area sources for permission to use a weight measurement device of alternative accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of ±1 percent impracticable. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standards.</p> <p>(iii) The owner or operator must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified,</p>

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	<p>at least once every 6 months.</p> <p>(2) Calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in §63.1512(o).</p> <p>(3) Record, for each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of:</p> <p>(i) Gaseous or liquid reactive flux other than chlorine; and</p> <p>(ii) Solid reactive flux.</p> <p>(4) Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in §63.1512(o). For solid flux that is added intermittently, record the amount added for each operating cycle or time period used in the performance test using the procedures in §63.1512(o).</p> <p>(5) The owner or operator of a group 1 furnace or in-line fluxer performing reactive fluxing may apply to the Administrator for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis.</p> <p>I. <u>Site-Specific Requirements (63.1510(s))</u></p> <p>(s) <i>Site-specific requirements for secondary aluminum processing units.</i> (1) An owner or operator of a secondary aluminum processing unit at a facility must include, within the OM&M plan prepared in accordance with §63.1510(b), the following information:</p> <p>(i) The identification of each emission unit in the secondary aluminum processing unit;</p> <p>(ii) The specific control technology or pollution prevention measure to be used for each emission unit in the secondary aluminum processing unit and the date of its installation or application;</p> <p>(iii) The emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;</p>

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	<p>(iv) Information and data demonstrating compliance for each emission unit with all applicable design, equipment, work practice or operational standards of this subpart; and</p> <p>(v) The monitoring requirements applicable to each emission unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average using the procedure in §63.1510(t).</p> <p>(2) The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:</p> <p>(i) Any averaging among emissions of differing pollutants;</p> <p>(ii) The inclusion of any affected sources other than emission units in a secondary aluminum processing unit;</p> <p>(iii) The inclusion of any emission unit while it is shutdown; or</p> <p>(iv) The inclusion of any periods of startup or shutdown in emission calculations.</p> <p>(3) To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the owner or operator must submit a request to the permitting authority for major sources, or the Administrator for area sources containing the information required by paragraph (s)(1) of this section and obtain approval of the permitting authority for major sources, or the Administrator for area sources prior to implementing any revisions.</p> <p>J. <u>Compliance by Individual Unit Demonstration (63.1510(u))</u></p> <p>(u) <i>Secondary aluminum processing unit compliance by individual emission unit demonstration.</i> As an alternative to the procedures of paragraph (t) of this section, an owner or operator may demonstrate, through performance tests that each individual emission unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emission unit.</p>
E.7	<p><u>Performance Testing</u></p> <p>A. <u>Dates (63.1501(e))</u></p> <p>(e) The owner or operator of an affected source that commences construction or reconstruction after February 14, 2012, must comply with all the requirements of this subpart by September 18, 2015 or upon startup, whichever is later.</p> <p>B. <u>General Requirements (63.1511)</u></p>

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	<p>(a) <i>Site-specific test plan.</i> Prior to conducting any performance test required by this subpart, the owner or operator must prepare a site-specific test plan which satisfies all of the rule requirements, and must obtain approval of the plan pursuant to the procedures set forth in §63.7. Performance tests shall be conducted under such conditions as the Administrator specifies to the owner or operator based on representative performance of the affected source for the period being tested. Upon request, the owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of performance tests.</p> <p>(b) <i>Initial performance test.</i> Following approval of the site-specific test plan, the owner or operator must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected source and emission unit, and report the results in the notification of compliance status report as described in §63.1515(b). The owner or operator of any affected source constructed before February 14, 2012, for which an initial performance test is required to demonstrate compliance must conduct this initial performance test no later than the date for compliance established by §63.1501. The owner or operator of any affected source constructed or reconstructed after February 14, 2012, for which an initial performance test is required must conduct this initial performance test within 180 days after the date for compliance established by §63.1501. Except for the date by which the performance test must be conducted, the owner or operator must conduct each performance test in accordance with the requirements and procedures set forth in §63.7(c). Owners or operators of affected sources located at facilities which are area sources are subject only to those performance testing requirements pertaining to D/F. Owners or operators of sweat furnaces meeting the specifications of §63.1505(f)(1) are not required to conduct a performance test.</p> <p>(1) The performance tests must be conducted under representative conditions expected to produce the highest level of HAP emissions expressed in the units of the emission standards for the HAP (considering the extent of feed/charge contamination, reactive flux addition rate and feed/charge rate). If a single test condition is not expected to produce the highest level of emissions for all HAP, testing under two or more sets of conditions (for example high contamination at low feed/charge rate, and low contamination at high feed/charge rate) may be required. Any subsequent performance tests for the purposes of establishing new or revised parametric limits shall be allowed upon pre-approval from the permitting authority for major sources, or the Administrator for area sources. These new parametric settings shall be used to demonstrate compliance for the period being tested.</p> <p>(2) Each performance test for a continuous process must consist of 3 separate runs; pollutant sampling for each run must be conducted for the time period specified in the applicable method or, in the absence of a specific time period in the test method, for a minimum of 3 hours.</p> <p>(3) Each performance test for a batch process must consist of three separate runs; pollutant sampling for each run must be conducted over the entire process operating cycle. Additionally, for</p>

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	<p>batch processes where the length of the process operating cycle is not known in advance, and where isokinetic sampling must be conducted based on the procedures in Method 5 in appendix A to part 60, use the following procedure to ensure that sampling is conducted over the entire process operating cycle:</p> <p>(i) Choose a minimum operating cycle length and begin sampling assuming this minimum length will be the run time (<i>e.g.</i>, if the process operating cycle is known to last from four to six hours, then assume a sampling time of four hours and divide the sampling time evenly between the required number of traverse points);</p> <p>(ii) After each traverse point has been sampled once, begin sampling each point again for the same time per point, in the reverse order, until the operating cycle is complete. All traverse points as required by Method 1 of appendix A to part 60, must be sampled at least once during each test run;</p> <p>(iii) In order to distribute the sampling time most evenly over all the traverse points, do not perform all runs using the same sampling point order (<i>e.g.</i>, if there are four ports and sampling for run 1 began in port 1, then sampling for run 2 could begin in port 4 and continue in reverse order.)</p> <p>(4) Where multiple affected sources or emission units are exhausted through a common stack, pollutant sampling for each run must be conducted over a period of time during which all affected sources or emission units complete at least 1 entire process operating cycle or for 24 hours, whichever is shorter.</p> <p>(5) Initial compliance with an applicable emission limit or standard is demonstrated if the average of three runs conducted during the performance test is less than or equal to the applicable emission limit or standard.</p> <p>(6) Apply paragraphs (b)(1) through (5) of this section for each pollutant separately if a different production rate, charge material or, if applicable, reactive fluxing rate would apply and thereby result in a higher expected emissions rate for that pollutant.</p> <p>(7) The owner or operator may not conduct performance tests during periods of malfunction.</p> <p>(c) <i>Test methods.</i> The owner or operator must use the following methods in appendix A to 40 CFR part 60 to determine compliance with the applicable emission limits or standards:</p> <p>(1) Method 1 for sample and velocity traverses.</p> <p>(2) Method 2 for velocity and volumetric flow rate.</p>

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	<p>(3) Method 3 for gas analysis.</p> <p>(4) Method 4 for moisture content of the stack gas.</p> <p>(5) Method 5 for the concentration of PM.</p> <p>(6) Method 9 for visible emission observations.</p> <p>(7) Method 23 for the concentration of D/F.</p> <p>(d) <i>Alternative methods.</i> The owner or operator may use alternative test methods as provided in paragraphs (d)(1) through (3) of this section.</p> <p>(1) The owner or operator may use test method ASTM D7520-13 as an alternative to EPA Method 9 subject to conditions described in §63.1510(f)(4).</p> <p>(2) In lieu of conducting the annual flow rate measurements using Methods 1 and 2, the owner or operator may use Method 204 in Appendix M to 40 CFR part 51 to conduct annual verification of a permanent total enclosure for the affected source/emission unit.</p> <p>(3) The owner or operator may use an alternative test method approved by the Administrator.</p> <p>(e) <i>Repeat tests.</i> The owner or operator of new or existing affected sources and emission units located at secondary aluminum production facilities that are major sources must conduct a performance test every 5 years following the initial performance test.</p> <p>(g) <i>Establishment of monitoring and operating parameter values.</i> The owner or operator of new or existing affected sources and emission units must establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by §63.1510 that ensures compliance with the applicable emission limit or standard. To establish the minimum or maximum value or range, the owner or operator must use the appropriate procedures in this section and submit the information required by §63.1515(b)(4) in the notification of compliance status report. The owner or operator may use existing data in addition to the results of performance tests to establish operating parameter values for compliance monitoring provided each of the following conditions are met to the satisfaction of the permitting authority for major sources, or the Administrator for area sources:</p> <p>(1) The complete emission test report(s) used as the basis of the parameter(s) is submitted.</p> <p>(2) The same test methods and procedures as required by this subpart were used in the test.</p>

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	<p>(3) The owner or operator certifies that no design or work practice changes have been made to the source, process, or emission control equipment since the time of the report.</p> <p>(4) All process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report.</p> <p>(5) If the owner or operator wants to conduct a new performance test and establish different operating parameter values, they must submit a revised site specific test plan and receive approval in accordance with paragraph (a) of this section. In addition, if an owner or operator wants to use existing data in addition to the results of the new performance test to establish operating parameter values, they must meet the requirements in paragraphs (g)(1) through (4) of this section.</p> <p>C. <u>Compliance Demonstration (63.1512(d))</u></p> <p>(d) <i>Group 1 furnace with add-on air pollution control devices.</i> (1) The owner or operator of a group 1 furnace that processes scrap other than clean charge materials with emissions controlled by a lime-injected fabric filter must conduct performance tests to measure emissions of PM and D/F at the outlet of the control device and emissions of HCl at the outlet (for the emission limit) or the inlet and the outlet (for the percent reduction standard).</p> <p>(j) <i>Secondary aluminum processing unit.</i> The owner or operator must conduct performance tests as described in paragraphs (j)(1) through (3) of this section. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM, HCl and HF and µg TEQ/Mg of feed/charge for D/F emissions from each emission unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in §63.1510(t). A performance test is required for:</p> <p>(j)(1) Each group 1 furnace processing only clean charge to measure emissions of PM and either:</p> <p>(j)(1)(i) Emissions of HF and HCl (for determining the emission limit); or</p> <p>(j)(1)(ii) The mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard).</p> <p>(j)(2) Each group 1 furnace that processes scrap other than clean charge to measure emissions of PM and D/F and either:</p> <p>(j)(2)(i) Emissions of HF and HCl (for determining the emission limit); or</p> <p>(j)(2)(ii) The mass flow rate of HCl at the inlet to and outlet from the control device (for the percent</p>

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	<p>reduction standard).</p> <p>(j)(3) Each in-line fluxer to measure emissions of PM and HCl.</p> <p>(k) <i>Feed/charge weight measurement.</i> During the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the owner or operator of an affected source or emission unit, subject to an emission limit in a kg/Mg (lb/ton) of feed/charge format, must measure (or otherwise determine) and record the total weight of feed/charge to the affected source or emission unit for each of the three test runs and calculate and record the total weight. An owner or operator that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the emission unit or affected source instead of the feed/charge weight.</p> <p>(l) <i>Continuous opacity monitoring system.</i> The owner or operator of an affected source or emission unit using a continuous opacity monitoring system must conduct a performance evaluation to demonstrate compliance with Performance Specification 1 in appendix B to 40 CFR part 60. Following the performance evaluation, the owner or operator must measure and record the opacity of emissions from each exhaust stack for all consecutive 6-minute periods during the PM emission test.</p> <p>(n) <i>Inlet gas temperature.</i> The owner or operator of a scrap dryer/delacquering kiln/decoating kiln or a group 1 furnace using a lime-injected fabric filter must use these procedures to establish an operating parameter value or range for the inlet gas temperature.</p> <p>(n)(1) Continuously measure and record the temperature at the inlet to the lime-injected fabric filter every 15 minutes during the HCl and D/F performance tests;</p> <p>(n)(2) Determine and record the 15-minute block average temperatures for the 3 test runs; and</p> <p>(n)(3) Determine and record the 3-hour block average of the recorded temperature measurements for the 3 test runs.</p> <p>(o) <i>Flux injection rate.</i> The owner or operator must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate and, for uncontrolled furnaces, the total reactive fluorine flux injection rate.</p> <p>(o)(1) Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15 minute period during the HCl, HF and D/F tests, determine and record the 15-minute block average weights, and calculate and record the total weight of the gaseous or liquid reactive flux for the 3 test runs;</p> <p>(o)(2) Record the identity, composition, and total weight of each addition of solid reactive flux for the</p>

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	<p>3 test runs;</p> <p>(o)(3) Determine the total reactive chlorine flux injection rate and, for uncontrolled furnaces, the total reactive fluorine flux injection rate by adding the recorded measurement of the total weight of chlorine and, for uncontrolled furnaces, fluorine in the gaseous or liquid reactive flux injected and the total weight of chlorine and, for uncontrolled furnaces, fluorine in the solid reactive flux using Equation 5:</p> $W_t = F_1 W_1 + F_2 W_2 \quad (\text{Eq. 5})$ <p>Where:</p> <p>W_t = Total chlorine or fluorine usage, by weight;</p> <p>F_1 = Fraction of gaseous or liquid flux that is chlorine or fluorine;</p> <p>W_1 = Weight of reactive flux gas injected;</p> <p>F_2 = Fraction of solid reactive chloride flux that is chlorine (e.g., $F = 0.75$ for magnesium chloride) or fraction of solid reactive fluoride flux that is fluorine (e.g., $F = 0.33$ for potassium fluoride); and</p> <p>W_2 = Weight of solid reactive flux;</p> <p>(o)(4) Divide the weight of total chlorine or fluorine usage (W_t) for the 3 test runs by the recorded measurement of the total weight of feed for the 3 test runs; and</p> <p>(o)(5) If a solid reactive flux other than magnesium chloride or potassium fluoride is used, the owner or operator must derive the appropriate proportion factor subject to approval by the permitting authority for major sources, or the Administrator for area sources.</p> <p>(p) <i>Lime injection.</i> The owner or operator of an affected source or emission unit using a lime-injected fabric filter system must use these procedures during the HCl and D/F tests to establish an operating parameter value for the feeder setting for each operating cycle or time period used in the performance test.</p> <p>(p)(1) For continuous lime injection systems, ensure that lime in the feed hopper or silo is free-flowing at all times; and</p> <p>(p)(2) Record the feeder setting and lime injection rate for the 3 test runs. If the feed rate setting and lime injection rates vary between the runs, determine and record the average feed rate and lime</p>

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Condition Number	Conditions
	<p>injection rate from the 3 runs.</p> <p>(q) <i>Bag leak detection system.</i> The owner or operator of an affected source or emission unit using a bag leak detection system must submit the information described in §63.1515(b)(6) as part of the notification of compliance status report to document conformance with the specifications and requirements in §63.1510(f).</p> <p>(r) <i>Labeling.</i> The owner or operator of each scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace and in-line fluxer must submit the information described in §63.1515(b)(3) as part of the notification of compliance status report to document conformance with the operational standard in §63.1506(b).</p> <p>(s) <i>Capture/collection system.</i> The owner or operator of a new or existing affected source or emission unit with an add-on control device must submit the information described in §63.1515(b)(2) as part of the notification of compliance status report to document conformance with the operational standard in §63.1506(c).</p> <p>D. <u>Equations (63.1513(b)(2) and (d))</u></p> <p>(2) Use Equation 7A of this section to determine compliance with an emission limit for D/F:</p> $E = \frac{C \times Q}{P} \quad (\text{Eq. 7A})$ <p>Where:</p> <p>E = Emission rate of D/F, µg/Mg (gr/ton) of feed;</p> <p>C = Concentration of D/F, µg/dscm (gr/dscf);</p> <p>Q = Volumetric flow rate of exhaust gases, dscm/hr (dscf/hr); and</p> <p>P = Production rate, Mg/hr (ton/hr).</p> <p>(d) <i>Conversion of D/F measurements to TEQ units.</i> To convert D/F measurements to TEQ units, the owner or operator must use the procedures and equations in <i>Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update</i>, incorporated by reference see §63.14.</p>
E.8	<p><u>Notifications (63.1515)</u></p> <p>(a) <i>Initial notifications.</i> The owner or operator must submit initial notifications to the permitting authority for major sources, or the Administrator for area sources as described in paragraphs (a)(1)</p>

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	<p>through (7) of this section.</p> <p>(1) As required by §63.9(b)(1), the owner or operator must provide notification for an area source that subsequently increases its emissions such that the source is a major source subject to the standard.</p> <p>(2) As required by §63.9(b)(3), the owner or operator of a new or reconstructed affected source, or a source that has been reconstructed such that it is an affected source, that has an initial startup after the effective date of this subpart and for which an application for approval of construction or reconstruction is not required under §63.5(d), must provide notification that the source is subject to the standard.</p> <p>(3) As required by §63.9(b)(4), the owner or operator of a new or reconstructed major affected source that has an initial startup after the effective date of this subpart and for which an application for approval of construction or reconstruction is required by §63.5(d) must provide the following notifications:</p> <p>(i) Intention to construct a new major affected source, reconstruct a major source, or reconstruct a major source such that the source becomes a major affected source;</p> <p>(ii) Date when construction or reconstruction was commenced (submitted simultaneously with the application for approval of construction or reconstruction if construction or reconstruction was commenced before the effective date of this subpart, or no later than 30 days after the date construction or reconstruction commenced if construction or reconstruction commenced after the effective date of this subpart);</p> <p>(iii) Anticipated date of startup; and</p> <p>(iv) Actual date of startup.</p> <p>(4) As required by §63.9(b)(5), after the effective date of this subpart, an owner or operator who intends to construct a new affected source or reconstruct an affected source subject to this subpart, or reconstruct a source such that it becomes an affected source subject to this subpart, must provide notification of the intended construction or reconstruction. The notification must include all the information required for an application for approval of construction or reconstruction as required by §63.5(d). For major sources, the application for approval of construction or reconstruction may be used to fulfill these requirements.</p> <p>(i) The application must be submitted as soon as practicable before the construction or reconstruction is planned to commence (but no sooner than the effective date) if the construction or</p>

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	<p>reconstruction commences after the effective date of this subpart; or</p> <p>(ii) The application must be submitted as soon as practicable before startup but no later than 90 days after the effective date of this subpart if the construction or reconstruction had commenced and initial startup had not occurred before the effective date.</p> <p>(5) As required by §63.9(d), the owner or operator must provide notification of any special compliance obligations for a new source.</p> <p>(6) As required by §63.9(e) and (f), the owner or operator must provide notification of the anticipated date for conducting performance tests and visible emission observations. The owner or operator must notify the Administrator of the intent to conduct a performance test at least 60 days before the performance test is scheduled; notification of opacity or visible emission observations for a performance test must be provided at least 30 days before the observations are scheduled to take place.</p> <p>(7) As required by §63.9(g), the owner or operator must provide additional notifications for sources with continuous emission monitoring systems or continuous opacity monitoring systems.</p> <p>(b) <i>Notification of compliance status report.</i> Each owner or operator of an existing affected source must submit a notification of compliance status report within 60 days after the compliance date established by §63.1501. Each owner or operator of a new affected source must submit a notification of compliance status report within 90 days after conducting the initial performance test required by §63.1511(b), or within 90 days after the compliance date established by §63.1501 if no initial performance test is required. The notification must be signed by the responsible official who must certify its accuracy. A complete notification of compliance status report must include the information specified in paragraphs (a)(1) through (10) of this section. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. In a State with an approved operating permit program where delegation of authority under section 112(l) of the CAA has not been requested or approved, the owner or operator must provide duplicate notification to the applicable Regional Administrator. If an owner or operator submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report must include:</p> <p>(1) All information required in §63.9(h). The owner or operator must provide a complete performance test report for each affected source and emission unit for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).</p>

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	<p>(2) The approved site-specific test plan and performance evaluation test results for each continuous monitoring system (including a continuous emission or opacity monitoring system).</p> <p>(3) Unit labeling as described in §63.1506(b), including process type or furnace classification and operating requirements.</p> <p>(4) The compliant operating parameter value or range established for each affected source or emission unit with supporting documentation and a description of the procedure used to establish the value (e.g., lime injection rate, total reactive chlorine flux injection rate, total reactive fluorine flux injection rate for uncontrolled group 1 furnaces, afterburner operating temperature, fabric filter inlet temperature), including the operating cycle or time period used in the performance test.</p> <p>(5) Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for capture/collection systems in §63.1506(c).</p> <p>(6) If applicable, analysis and supporting documentation demonstrating conformance with EPA guidance and specifications for bag leak detection systems in §63.1510(f).</p> <p>(9) The OM&M plan (including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device).</p>
E.9	<p><u>Reports (63.1516)</u></p> <p>(b) <i>Excess emissions/summary report.</i> The owner or operator of a major or area source must submit semiannual reports according to the requirements in §63.10(e)(3). Except, the owner or operator must submit the semiannual reports within 60 days after the end of each 6-month period instead of within 30 days after the calendar half as specified in §63.10(e)(3)(v). When no deviations of parameters have occurred, the owner or operator must submit a report stating that no excess emissions occurred during the reporting period.</p> <p>(1) A report must be submitted if any of these conditions occur during a 6-month reporting period:</p> <p>(i) The corrective action specified in the OM&M plan for a bag leak detection system alarm was not initiated within 1 hour.</p> <p>(iv) An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).</p>

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	<p>(v) [Reserved]</p> <p>(vi) An affected source (including an emission unit in a secondary aluminum processing unit) was not operated according to the requirements of this subpart.</p> <p>(vii) A deviation from the 3-day, 24-hour rolling average emission limit for a secondary aluminum processing unit.</p> <p>(2) Each report must include each of these certifications, as applicable:</p> <p>(vii) For each affected source choosing to demonstrate compliance during periods of startup and shutdown in accordance with §63.1513(f)(1): "During each startup and shutdown, no flux and no feed/charge were added to the emission unit, and electricity, propane or natural gas were used as the sole source of heat or the emission unit was not heated."</p> <p>(3) The owner or operator must submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.</p> <p>(i) Within 60 days after the date of completing each performance test (as defined in §63.2) required by this subpart, you must submit the results of the performance tests, including any associated fuel analyses, following the procedure specified in either paragraph (b)(3)(i)(A) or (B) of this section.</p> <p>(A) For data collected using test methods supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT Web site (https://www3.epa.gov/ttn/chief/ert/ert_info.html), you must submit the results of the performance test to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's Central Data Exchange (CDX) (https://cdx.epa.gov/.) Performance test data must be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT Web site. If you claim that some of the performance test information being submitted is confidential business information (CBI), you must submit a complete file generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT Web site, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage media to the EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT or alternate file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier in this paragraph.</p>

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	<p>(B) For data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT Web site, you must submit the results of the performance test to the Administrator at the appropriate address listed in §63.13.</p> <p>(d) If there was a malfunction during the reporting period, the owner or operator must submit a report that includes the emission unit ID, monitor ID, pollutant or parameter monitored, beginning date and time of the event, end date and time of the event, cause of the deviation or exceedance and corrective action taken for each malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must include a list of the affected source or equipment, an estimate of the quantity of each regulated pollutant emitted over any emission limit, and a description of the method used to estimate the emissions, including, but not limited to, product-loss calculations, mass balance calculations, measurements when available, or engineering judgment based on known process parameters. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.1506(a)(5).</p>
E.10	<p><u>Records (63.1517)</u></p> <p>(a) As required by §63.10(b), the owner or operator shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart.</p> <p>(1) The owner or operator must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.</p> <p>(2) The owner or operator may retain records on microfilm, computer disks, magnetic tape, or microfiche; and</p> <p>(3) The owner or operator may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.</p> <p>(b) In addition to the general records required by §63.10(b), the owner or operator of a new or existing affected source (including an emission unit in a secondary aluminum processing unit) must maintain records of:</p> <p>(1) For each affected source and emission unit with emissions controlled by a fabric filter or a lime-injected fabric filter:</p> <p>(i) If a bag leak detection system is used, the number of total operating hours for the affected source or emission unit during each 6-month reporting period, records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of</p>

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	<p>the alarm and the corrective action(s) taken.</p> <p>(4) For each affected source and emission unit with emissions controlled by a lime-injected fabric filter:</p> <p>(i) Records of inspections at least once every 8-hour period verifying that lime is present in the feeder hopper or silo and flowing, including any inspection where blockage is found, with a brief explanation of the cause of the blockage and the corrective action taken, and records of inspections at least once every 4-hour period for the subsequent 3 days. If flow monitors, pressure drop sensors or load cells are used to verify that lime is present in the hopper and flowing, records of all monitor or sensor output including any event where blockage was found, with a brief explanation of the cause of the blockage and the corrective action taken;</p> <p>(ii) If lime feeder setting is monitored, records of daily and monthly inspections of feeder setting, including records of any deviation of the feeder setting from the setting used in the performance test, with a brief explanation of the cause of the deviation and the corrective action taken. If a lime feeder has been repaired or replaced, this action must be documented along with records of the new feeder calibration and the feed mechanism set points necessary to maintain the lb/hr feed rate operating limit. These records must be maintained on site and available upon request.</p> <p>(iii) If lime addition rate for a noncontinuous lime injection system is monitored pursuant to the approved alternative monitoring requirements in §63.1510(v), records of the time and mass of each lime addition during each operating cycle or time period used in the performance test and calculations of the average lime addition rate (lb/ton of feed/charge).</p> <p>(5) For each group 1 furnace (with or without add-on air pollution control devices) or in-line fluxer, records of 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.</p> <p>(13) Records of monthly inspections for proper unit labeling for each affected source and emission unit subject to labeling requirements.</p> <p>(14) Records of annual inspections of emission capture/collection and closed vent systems or, if the alternative to the annual flow rate measurements is used, records of differential pressure; fan RPM or fan motor amperage; static pressure measurements; or duct centerline velocity using a hotwire anemometer, ultrasonic flow meter, cross-duct pressure differential sensor, venturi pressure differential monitoring or orifice plate equipped with an associated thermocouple, as appropriate.</p>

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	<p>(15) Records for any approved alternative monitoring or test procedure.</p> <p>(16) Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:</p> <ul style="list-style-type: none">(ii) OM&M plan; <p>(17) For each secondary aluminum processing unit, records of total charge weight, or if the owner or operator chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.</p> <p>(18) For any failure to meet an applicable standard, the owner or operator must maintain the following records:</p> <ul style="list-style-type: none">(i) Records of the emission unit ID, monitor ID, pollutant or parameter monitored, beginning date and time of the event, end date and time of the event, cause of the deviation or exceedance and corrective action taken.(ii) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.1506(a)(5), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. <p>(19) For each period of startup or shut down for which the owner or operator chooses to demonstrate compliance for an affected source, the owner or operator must comply with (b)(19)(i) or (ii) of this section.</p> <ul style="list-style-type: none">(i) To demonstrate compliance based on a feed/charge rate of zero, a flux rate of zero and the use of electricity, propane or natural gas as the sole sources of heating or the lack of heating, the owner or operator must submit a semiannual report in accordance with §63.1516(b)(2)(vii) or maintain the following records:<ul style="list-style-type: none">(A) The date and time of each startup and shutdown;(B) The quantities of feed/charge and flux introduced during each startup and shutdown; and(C) The types of fuel used to heat the unit, or that no fuel was used, during startup and shutdown; or(ii) To demonstrate compliance based on performance tests, the owner or operator must maintain the following records:

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Condition Number	Conditions
	<p>(A) The date and time of each startup and shutdown;</p> <p>(B) The measured emissions in lb/hr or µg/hr or ng/hr;</p> <p>(C) The measured feed/charge rate in tons/hr or Mg/hr from your most recent performance test associated with a production rate greater than zero, or the rated capacity of the affected source if no prior performance test data is available; and</p> <p>(D) An explanation to support that such conditions are considered representative startup and shutdown operations.</p> <p>(20) For owners or operators that choose to change furnace operating modes, the following records must be maintained:</p> <p>(i) The date and time of each change in furnace operating mode, and</p> <p>(ii) The nature of the change in operating mode (for example, group 1 controlled furnace processing other than clean charge to group 2).</p>

F. AMBIENT AIR STANDARDS REQUIREMENTS

Condition Number	Conditions
F.1	<p>Air dispersion modeling (or other method) has demonstrated that this facility's operation will not interfere with the attainment and maintenance of any state or federal ambient air standard. Any changes in the parameters used in this demonstration may require a review by the facility to determine continuing compliance with these standards. These potential changes include any decrease in stack height, decrease in stack velocity, increase in stack diameter, decrease in stack exit temperature, increase in building height or building additions, increase in emission rates, decrease in distance between stack and property line, changes in vertical stack orientation, and installation of a rain cap that impedes vertical flow. Parameters that are not required in the determination will not invalidate the demonstration if they are modified. The emission rates used in the determination are listed in Attachment - Emission Rates for Ambient Air Standards of this permit. Higher emission rates may be administratively incorporated into Attachment - Emission Rates for Ambient Air Standards of this permit provided a demonstration using these higher emission rates shows the attainment and maintenance of any state or federal ambient air quality standard or with any other applicable requirement. Variations from the input parameters in the demonstration shall not constitute a violation unless the maximum allowable ambient concentrations identified in the standard are exceeded.</p>

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F. AMBIENT AIR STANDARDS REQUIREMENTS

Condition Number	Conditions
	The owner/operator shall maintain this facility at or below the emission rates as listed in Attachment - Emission Rates for Ambient Air Standards, not to exceed the pollutant limitations of this permit. Should the facility wish to increase the emission rates listed in Attachment - Emission Rates for Ambient Air Standards, not to exceed the pollutant limitations in the body of this permit, it may do so by the administrative process specified above. This is a State Only enforceable requirement.

G. PERIODIC REPORTING SCHEDULE

Compliance Monitoring Report Submittal Frequency	Reporting Period (Begins on the startup date of the source)	Report Due Date
Quarterly	January-March April-June July-September October-December	April 30 July 30 October 30 January 30
Semiannual	January-June April-September July-December October-March	July 30 October 30 January 30 April 30
Annual	January-December April-March July-June October-September	January 30 April 30 July 30 October 30
Note: This reporting schedule does not supersede any federal reporting requirements including but not limited to 40 CFR Part 60, 40 CFR Part 61, and 40 CFR Part 63. All federal reports must meet the reporting time frames specified in the federal standard unless the Department or EPA approves a change.		

H. REPORTING CONDITIONS

Condition Number	Conditions
H.1	Reporting required in this permit, shall be submitted in a timely manner as directed in the Periodic Reporting Schedule of this permit.
H.2	All reports and notifications required under this permit shall be submitted to the person indicated in the specific condition at the following address: <p align="center">2600 Bull Street Columbia, SC 29201</p> The contact information for the local Environmental Affairs Regional office can be found at: <p align="center">http://www.scdhec.gov</p>

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H. REPORTING CONDITIONS

Condition Number	Conditions
H.3	The owner/operator shall submit written notification to the Director of Air Permitting of the date construction is commenced, postmarked within 30 days after such date.
H.4	Unless elsewhere specified within this permit, all reports required under this permit shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality.
H.5	<p>(S.C. Regulation 61-62.1, Section II.J) For sources not required to have continuous emission monitors, any malfunction of air pollution control equipment or system, process upset, or other equipment failure which results in discharges of air contaminants lasting for one (1) hour or more and which are greater than those discharges described for normal operation in the permit application, shall be reported to the Department within twenty-four (24) hours after the beginning of the occurrence and a written report shall be submitted to the Department within thirty (30) days. The written report shall include, at a minimum, the following:</p> <ol style="list-style-type: none">1. The identity of the stack and/or emission point where the excess emissions occurred;2. The magnitude of excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the excess emissions;3. The time and duration of excess emissions;4. The identity of the equipment causing the excess emissions;5. The nature and cause of such excess emissions;6. The steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunction;7. The steps taken to limit the excess emissions; and,8. Documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated, to the maximum extent practicable, in a manner consistent with good practice for minimizing emissions. <p>The initial twenty-four (24) hour notification should be made to the Department's local Environmental Affairs Regional office.</p> <p>The written report should be sent to the Manager of the Technical Management Section, Bureau of Air Quality and the local Environmental Affairs Regional office.</p>

I. PERMIT EXPIRATION AND EXTENSION

Condition Number	Conditions
I.1	<p>(S.C. Regulation 61-62.1, Section II.A.4) Approval to construct shall become invalid if construction:</p> <ol style="list-style-type: none">a. is not commenced within 18 months after receipt of such approval;b. is discontinued for a period of 18 months or more; orc. is not completed within a reasonable time as deemed by the Department. <p>The Department may extend the construction permit for an additional 18-month period upon a</p>

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I. PERMIT EXPIRATION AND EXTENSION

Condition Number	Conditions
	satisfactory showing that an extension is justified. This request must be made prior to the permit expiration.
I.2	This provision does not apply to the time period between construction of the approved phases of a phased construction project; each phase must commence construction within 18 months of the projected and approved commencement date.

J. PERMIT TO OPERATE

Condition Number	Conditions
J.1	(S.C. Regulation 61-62.1 Section II.F.2) The owner/operator or professional engineer in charge of the project shall certify that, to the best of his/her knowledge and belief and as a result of periodic observation during construction, the construction under application has been completed in accordance with the specifications agreed upon in the construction permit issued by the Department.
J.2	If construction is certified as provided in S.C. Regulation 61-62.1 Section II.F.2, the owner or operator, may operate the source in compliance with the terms and conditions of the construction permit until the operating permit is issued by the Department.
J.3	If construction is not built as specified in the permit application and associated construction permit(s), the owner/operator must submit to the Department a complete description of modifications that are at variance with the documentation of the construction permitting determination prior to commencing operation. Construction variances that would trigger additional requirements that have not been addressed prior to start of operation shall be considered construction without a permit.
J.4	(S.C. Regulation 61-62.1, Section II.F.3) The owner or operator shall submit a written request to the Director of Air Permitting for a new or revised operating permit to cover any new or altered source postmarked within 15 days after the actual date of initial startup of each new or altered source. The written request for a new or revised operating permit must include, as a minimum, the following information: i. A list of sources that were placed into operation. ii. The actual date of initial startup of each new or altered source.

K. GENERAL CONDITIONS

Condition Number	Conditions
K.1	The permittee shall pay permit fees to the Department in accordance with the requirements of S.C. Regulation 61-30, Environmental Protection Fees.

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K. GENERAL CONDITIONS

Condition Number	Conditions
K.2	<p>In the event of an emergency, as defined in S.C. Regulation 61-62.1, Section II.L, the owner or operator may document an emergency situation through properly signed, contemporaneous operating logs, and other relevant evidence that verify:</p> <ol style="list-style-type: none">1. An emergency occurred, and the owner or operator can identify the cause(s) of the emergency;2. The permitted source was at the time the emergency occurred being properly operated;3. During the period of the emergency, the owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and4. The owner or operator gave a verbal notification of the emergency to the Department within 24 hours of the time when emission limitations were exceeded, followed by a written report within 30 days. The written report shall include, at a minimum, the information required by S.C. Regulation 61-62.1, Section II.J.1.c.i through viii. The written report shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. <p>This provision is in addition to any emergency or upset provision contained in any applicable requirement.</p>
K.3	<p>(S.C. Regulation 61-62.1, Section II.O) Upon presentation of credentials and other documents as may be required by law, the owner or operator shall allow the Department or an authorized representative to perform the following:</p> <ol style="list-style-type: none">1. Enter the facility where emissions-related activity is conducted, or where records must be kept under the conditions of the permit.2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit.3. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.4. As authorized by the Federal Clean Air Act and/or the S.C. Pollution Control Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

L. EMISSIONS INVENTORY REPORTS - RESERVED

ATTACHMENT - Emission Rates for Ambient Air Standards

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The emission rates listed herein are not considered enforceable limitations but are used to evaluate ambient air quality impact. Until the Department makes a determination that a facility is causing or contributing to an exceedance of a state or federal ambient air quality standard, increases to these emission rates are not in themselves considered violations of these ambient air quality standards (see Ambient Air Standards Requirements).

AMBIENT AIR QUALITY STANDARDS - STANDARD NO. 2						
Emission Point ID	Emission Rates (lbs/hr)					
	PM ₁₀	PM _{2.5}	SO ₂	NO _x	CO	Lead
BH1	0.67	0.67	0.003	0.50	0.42	2.50E-06

Attachment B

Statement of Basis for Air Quality Permit No. 1200-0510-CC



STATEMENT OF BASIS
Page 1 of 3
 BAQ Engineering Services Division

Company Name	Adams Scrap Recycling LLC	Permit Writer:	Utpal Patel
Permit Number:	1200-0510.CC	Date:	February 15, 2019

DATE APPLICATION RECEIVED: April 26, 2018

FACILITY DESCRIPTION

Adams Scrap Recycling, LLC is a major recycler of metals products; the facility also recycles glass, paper, plastic and electronics.

PROJECT DESCRIPTION

The facility is applying for a construction permit for the installation of natural gas fired Secondary Aluminum processing rotary melting furnace with Baghouse with Lime Injection.

The facility is requesting a facility-wide federally enforceable limit of <100.0 tpy for PM₁₀ to apply for synthetic minor construction permit and to avoid being major for TV. The facility is also taking a federally enforceable limit of <10.0 tpy of Individual HAP and <25.0 tpy of Aggregate HAPs to avoid being major source of HAPs.

SPECIAL CONDITIONS

Condition C.8 has been placed in the permit to describe the scrap that is allowed to be melted, what is not allowed to be melted, and permission must be obtained from the Bureau of Air Quality before they melt anything else that is not listed.

Condition C.9 has been added due to comments regarding the frequency of monitoring.

Condition C.10 is being added due to comments about open burning being conducted at night.

EMISSIONS

Pollutant	FACILITY WIDE EMISSIONS	
	Uncontrolled Emissions	Controlled/Limited Emissions
	TPY	TPY
PM	174.80	2.91
PM ₁₀	160.39	2.91
PM _{2.5}	17.65	2.91
SO ₂	0.01	N/A
NO _x	2.19	N/A
CO	1.84	N/A
VOC	0.12	N/A
Hydrochloric Acid	46.56	9.64
Dioxin/Furans	0.0000018	N/A

OPERATING PERMIT STATUS

This facility does not currently have an operating permit but will be issued a Conditional Major Operating Permit.

REGULATORY APPLICABILITY REVIEW	
Regulations	Comments/Periodic Monitoring Requirements
Section II.E – Synthetic Minor	The facility is applying for a synthetic minor permit to limit <100.0 tpy for PM ₁₀ and <10.0 tpy of Individual HAP and <25.0 tpy of Aggregate HAPs to avoid being major source for TV and HAPs respectively.



STATEMENT OF BASIS
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 BAQ Engineering Services Division

Company Name	Adams Scrap Recycling LLC	Permit Writer:	Utpal Patel
Permit Number:	1200-0510.CC	Date:	February 15, 2019

REGULATORY APPLICABILITY REVIEW	
Regulations	Comments/Periodic Monitoring Requirements
Standard No. 1	The project does not have any indirect-fired fuel burning sources. Burner is an integral part of rotary furnace.
Standard No. 3 (state only)	The project does not have any waste combustion/reduction processes.
Standard No. 4	Rotary furnace, including any fugitives, is subject to PM and 20% opacity limit under this standard.
Standard No. 5	The facility was not in existence in 1979/1980.
Standard No. 5.2	5.0 Million Btu/hr natural gas fired burner emits <5.0 tpy of NOx; therefore, exempt from this standard.
Standard No. 7	The facility is not one of the 28 source categories; therefore, PSD threshold for criteria pollutants is 250.0 tpy. The facility is a minor source for PSD.
61-62.6	Fugitive Particulate (PM) emissions from material handling, handling of waste debris from the furnace, process equipment, control equipment, or storage piles will be minimized to the maximum extent possible.
40 CFR 60 and 61-62.60	This facility does not contain sources subject to any NSPS standard.
40 CFR 61 and 61-62.61	This project does not emit the pollutants subject to this standard (benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride).
40 CFR 63 and 61-62.63	This facility is subject to 40 CFR 63 Subpart RRR, NESHAP for Secondary Aluminum Production, Melting Furnace Operations as a new unit for an area source.
61-62.68	The project does not use or store any chemicals subject to 112(r) above threshold amounts.
40 CFR 64 (CAM)	The facility will not be Title V, therefore CAM does not apply.

AMBIENT AIR STANDARDS REVIEW	
Regulations	Comments/Periodic Monitoring Requirements
Standard No. 2	The facility has shown compliance with Standard No. 2 dated May 23, 2018. Pollutants subject to Standard No. 2 are exempt.
Standard No. 8 (state only)	The facility has shown compliance with Standard No. 8 dated May 23, 2018. Compliance with Standard No. 8 is shown by being in compliance with the MACT (40 CFR 63 Subpart RRR).

PUBLIC NOTICE

This construction permit has undergone a 30-day public notice period to establish synthetic minor limits for PM₁₀ less than 100 tons per year for Title V avoidance. The comment period was open from July 10, 2018, to August 8, 2019. The permit and the statement of basis were placed on the BAQ website during that time period.

During the Public Notice period there was a request for a Public Meeting. A Public Meeting was scheduled and held on October 18, 2018. After the Public Meeting the comment period was reopened until 5:00 PM October 26, 2018. During the meeting and comment period many comments were submitted and Conditions C.8, C.9 & C.10 have been added to address several of those concerns. Condition C.8 has been placed in the permit to describe the scrap that is allowed to be melted, what is not allowed to be melted, and permission must be obtained from the Bureau of Air



STATEMENT OF BASIS
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BAQ Engineering Services Division

Company Name	Adams Scrap Recycling LLC	Permit Writer:	Utpal Patel
Permit Number:	1200-0510.CC	Date:	February 15, 2019

Quality before they melt anything else that is not listed. Condition C.9 has been added due to comments that regarding the frequency of monitoring not being enough. Condition C.10 is being added due to comments about open burning being conducted at night.

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.

Attachment C

Response to Comments on Air Quality Permit No. 1200-0510-CC

**South Carolina Department of Health and Environmental Control (SC DHEC)
Bureau of Air Quality (BAQ)**

**Response to Comments
Public Notice #18-034-CM-C
Adams Scrap Recycling, LLC
Greenville County, South Carolina
Permit No. 1200-0510-CC**

The following is the SC DHEC BAQ's (Department) response to comments made during the formal comment period beginning July 10, 2018 through October 26, 2018, and the public meeting held on October 18, 2018, regarding the draft synthetic minor construction permit for Adams Scrap Recycling, LLC (Adams) located on Old Easley Road in Greenville County.

The Department Decision, permit, statement of basis, this response document, and a letter of notification to citizens is located for viewing at the SC DHEC Columbia office located at 2600 Bull Street, Columbia, SC 29201, and on our webpage at www.scdhec.gov/air-quality-permitting-decisions. Citizens who submitted comment or asked to be notified will be sent notice by certified mail, return receipt requested. Hardcopies of all the above-listed documents, as well as the written comments received, and transcript of the public hearing can be requested by contacting our Freedom of Information Office at (803) 898-3882. The following is a summary of all comments submitted and the Department's response.

Inspections and Compliance - Comments were received regarding the facility's compliance history and inspection of the facility. These comments included: concern that the facility has a poor track record of compliance, including claimed non-compliance related to groundwater or storm water, burning of materials at night, absence of required permits; concern about particulate fallout from the facility onto private property; concern about the facility owner's background or personal history; an argument that the company's compliance record should play into the Department's permitting decision; and concern about limited staff resources for inspections.

In response to comments and concerns relating to burning of materials at night and particulate fallout from the facility on private property, the Department's regional office inspector conducted an inspection of the site March 28, 2014, and no evidence of open burning of materials was observed. On January 9, 2019, an inspection was

performed to investigate particulate fallout concerns, the representative from Adams Scrap demonstrated to the inspector the facility's process by which insulation is removed from the wire. The Adams Scrap representative stated the facility would not burn insulation off in any case as the heat degrades the copper. The inspector did not observe any evidence that there was particulate fallout at that time from the Adams Scrap property. The inspector has met with the citizen providing the comment and encouraged them to call promptly after observing any fallout in the future, so the complaint could be investigated in a timely manner.

Concerns relating to non-compliance with groundwater, stormwater, timber removal and County code issues have been referred to the programs that oversee those matters. The Department has been informed that complaints regarding these matters have been investigated in the past and the facility has either made required corrections or was not found to be in violation (see further discussion related to water and soil impacts below). The Department takes compliance seriously and we strongly encourage the public to report these concerns as soon as they are observed as it becomes more difficult to investigate after time has passed.

The Department does not only investigate when a complaint is received. The Department conducts unannounced inspections at most facilities at a minimum of every other year. However, due to concerns raised by the public, the Department intends to perform inspections of this facility on a more frequent basis to the extent possible, including times when the Department receives any complaints regarding improper operation of the aluminum melting furnace. These inspections are unannounced, and no prior notice is given to the facility. During air quality inspections, all sources listed on the permit are inspected for compliance with the terms and conditions as stated in the permit. The inspections also include a review of all records, logs, etc. for compliance with the permit, and if there are any inconsistencies between the permit and the operation of the facility, these deviations or possible violations are detailed in the inspection report and referred to the Department's Enforcement Section for review. If the Enforcement Section determines that a potential violation has occurred, enforcement action may be taken requiring corrective action and the possible payment of civil penalties.

Air inspection reports are typically completed within 30 days after an inspection and contain a list of equipment and logs inspected, the compliance status with permit conditions, and any deviations or potential violations. Inspection reports are available through the SC DHEC's Freedom of Information (FOI) Center. For more

information on FOI requests, including fees, visit the following webpage: <http://www.scdhec.gov/Agency/RequestCopiesofRecords/>.

The Department has guidelines for responding to complaints within 24 to 48 hours. This guideline is established to ensure that all complaints are prioritized and handled based on the health and safety of our citizens. It is possible when a complaint is received that it could be handled within a few hours depending on other complaints and incidents that can occur on any given day, as well as the nature of the complaint, it may take the full response time. The response time frame is set to ensure that Department staff will investigate a complaint within two days.

The Department also monitors the operation of the facility in ways other than physical site inspections. The permit requires record keeping and reporting. These records and reports are required to be submitted and are reviewed by the Department.

The Department also plans to provide compliance assistance to the permittee to ensure Adams Scrap and its representatives fully understand the requirements of the permit. This will involve going to the site soon after the permit is issued to go over the permit and observe how the permit terms and conditions are being adhered to. During the compliance assistance visit, the Department will note any areas of concern and recommend changes to the permittee to avoid future non-compliance. We believe this educational process is extremely beneficial in obtaining ongoing compliance.

The Department must base air permit decisions on the applicable air quality regulations and standards in place at the time of the Department's technical review of the permit application. In this case, the facility has met those requirements for issuance of a permit and nothing in the facility's DHEC compliance history provides grounds for denial in this case. As discussed above, the Department will respond to any noncompliance and take enforcement action as needed.

Greenville County Code Issues - A comment was received relating to claimed non-compliance subject to Greenville County enforcement.

The Department met with the County of Greenville on January 29, 2019, to discuss any open violations and to determine what County inspections are performed. The county informed the Department that it does not have any open complaints or violations for Adams Scrap in the past five years. The Stormwater permit is jointly

enforced by the Department and Greenville County. Neither the Department nor the County has any current open violations on record for Adams Scrap. Any future potential non-compliance with Greenville County codes should be sent to the county office for investigation and enforcement.

Furnace Operation/Control Device/MACT Requirements – Comments were received on operational issues including: the kind of material allowed to be placed in the furnace; whether the Department can require extra controls; whether the proposed source could use an older, less efficient unit; and whether the facility has reporting and monitoring requirements. Some commenters stated general concern about air quality impacts. One commenter stated a concern about a perceived lack of regulation for the site.

This is in response to the comment about the kind of material allowed to be placed in the furnace. The Department has added a condition to the permit that specifies what is allowed to be melted in the furnace. The new condition specifies what the Department has determined to be clean scrap.

The facility is permitted to operate the furnace as a Group I furnace under 40 Code of Federal Regulation (CFR) Part 63, Subpart RRR, and S.C. Regulation 61-62.63, Subpart RRR (collectively “Subpart RRR”), which apply to secondary aluminum production operations nationwide. These Federal regulations are more commonly referred to as Maximum Achievable Control Technology (MACT) standards. A Group 1 furnace is a furnace of any design that melts, holds, or processes aluminum that contains paint, lubricants, coatings, or other foreign materials with or without reactive fluxing, or processes clean charge with reactive fluxing. (40 CFR 63, Subpart RRR)

This construction permit is issued for a 5.0 Million Btu/hr heat input capacity natural gas fired Group I furnace. If the facility decides to install a different furnace, it would be required to apply for another construction permit and demonstrate the proposed source could meet all regulatory requirements and standards that the different furnace would be subject to.

The proposed furnace is subject to emission limits, monitoring, record keeping, and reporting requirements under 40 CFR 63, Subpart RRR. The facility must also perform daily monitoring of pressure drop and inlet gas temperature to the Baghouse and Lime injection system. The facility will also have to conduct an initial source test for particulate matter (PM), hydrochloric acid (HCl) and Dioxin/Furan

within 180 days from the start-up of the furnace to show compliance with the respective emission limits of Subpart RRR.

Consistent with Subpart RRR, a Baghouse and Lime Injection is the required control device that must be used, and the facility must meet the applicable Subpart RRR emission limits. MACT standards are designed to ensure sources are controlled to the maximum degree possible, considering all statutorily required factors.

From the time of initial start-up of the furnace, the facility is required to be in compliance with all the requirements of Subpart RRR. The Department will also provide compliance assistance to the facility to ensure the facility understands the applicable MACT requirements and complies with them and all requirements of the permit.

Water/Groundwater and Soil Impacts - Comments were received regarding the potential impacts this facility may have on surrounding surface water, groundwater, and soil resources. One commenter asked about waste material and its disposal.

Potential impacts to surface water, groundwater, and soil resources are outside the scope of this Department decision regarding issuance of an air quality construction permit. These concerns, however, are addressed by permit and regulatory requirements within the purview of other Department programs, and the facility must ensure it complies with all such requirements.

The facility has a current storm water permit issued in 2012, which the Bureau of Water has jurisdiction over. The facility was inspected on April 7 and 8, 2011, by the Department to determine compliance with the NPDES General Permit SCR003154 for Storm Water Discharges Associated with Industrial Activities (Except Construction) effective January 1, 2011. Based on the findings of that inspection, Adams Scrap was given a rating of Unsatisfactory for the implementation of the facility's storm water management program. The Department also observed deficiencies related to solid waste. Adams Scrap was deemed in violation of Section 48-1-90 and 48-1-110 of the Code of Laws of South Carolina and went through the Department's enforcement and compliance process. The facility was required to correct deficiencies that were found.

South Carolina DHEC has several monitors along the Saluda River in the area near the facility. There is a monitoring application on the website that citizens can obtain water quality data for the Saluda River. The monitoring application is found on the

S.C. DHEC website under the following link:
<https://gis.dhec.sc.gov/water/stormwater.html>

The Bureau of Land and Waste Management (BLWM) implements regulations regarding the handling and disposal of waste from the furnace. The facility has been notified that it should contact the BLWM to determine if any permits may be required for handling, storage and disposal of waste.

The Department will continue to conduct inspections as required and investigate any future complaints.

Odor - Comments were received regarding odors from existing operations and potential odors from the newly permitted operations. Specifically, commenters raised concern about odors of smoke, burning oil, or insulation from burning wire from the facility at night.

There are no applicable federal or state odor regulations. The presence of odor does not necessarily indicate the presence of dangerous levels of air pollution. Many air pollutants can be detected by smell at much lower concentrations than the maximum allowable concentrations established to protect public health.

Adams Scrap has stated that it would not burn insulation off in any case as the heat degrades the copper. However, if citizens observe any abnormal odors, these should be reported to the Department's Regional office so that an investigation can be conducted in an attempt to determine the cause and ensure the abnormal odors are not associated with improper operation.

Health - Comments were received regarding the facility's existing and potential impacts to the community's health, including any relationship between existing emissions and adverse health conditions, as well as specific impacts on the elderly and children as well as those with existing asthma and respiratory/breathing conditions. Commenters also asked about surveys or additional studies of health issues in the area surrounding the facility, and one commenter asked about cancer registry information. One commenter also stated concerns about health effects to pregnant women and children arising from lead pollution from the smelting operations. A comment was received that a survey/study be done on the residents within a 5-mile radius of Adam Scrap on health issues.

The Department's issuance or denial of an air quality permit must be based on applicable air quality standards and requirements. The Clean Air Act (CAA) requires the U.S. Environmental Protection Agency (EPA) to establish National Ambient Air Quality Standards (NAAQS) for six common pollutants ("criteria" pollutants) considered harmful to public health. There are two types of NAAQS: primary standards and secondary standards. Primary standards are set to protect public health, in particular, the health of sensitive populations such as asthmatics, children, and the elderly. Secondary standards are set to protect public welfare, such as protection against decreased visibility, and damage to animals, crops, vegetation, and buildings. These standards must be reviewed periodically by the EPA and have become more stringent over time.

In accordance with S.C Regulation 61-62.1, "no permit to construct or modify a source will be issued if emissions interfere with attainment or maintenance of any state or federal standard." The Department has reviewed the application and information submitted by Adams Scrap. Adams Scrap evaluated its emissions and determined that controlled emissions of criteria pollutants from the facility would be below threshold levels requiring an air quality analysis (see section on "Ambient Air Monitoring" below for further discussion). The facility's emissions of criteria pollutants below the de minimis threshold levels demonstrates that no violation of the NAAQS will occur. Furthermore, as discussed above, the Adams Scrap facility is subject to MACT requirements which limit emissions of other pollutant emissions, including HCl, to levels established by EPA.

The Department understands and values the commenters' concerns for the community's health. In response to comments received, the DHEC South Carolina Central Cancer Registry was asked to conduct a cancer analysis of this community (for zip code 29611), and they provided the following response:

"Cancer Incidence: The analysis revealed that no types of cancer showed any evidence of clustering. Therefore, no further action by DHEC is anticipated.

Cancer deaths: The analysis revealed that no types of cancer deaths showed any evidence of clustering. Therefore, no further action by DHEC is anticipated. Please be aware this is only an analysis completed by the DHEC SC Central Cancer Registry. A full copy of this report can be requested from the SC Central Cancer Registry."

For information regarding cancer incidence and mortality within this, or any other area in South Carolina, individuals may contact the S.C. Central Cancer Registry.

More information on the S.C. Central Cancer Registry is available at <https://www.scdhec.gov/health/diseases-conditions/cancer/sc-cancer-statistics-and-reports/sc-central-cancer-registry>.

Information related to lead exposure can be found later in this document.

Ambient Air Monitoring – There were questions raised about the air quality around the facility. Commenters inquired about the extent of testing or monitoring around the facility and stated that additional baseline monitoring is needed to understand impacts from the project. One commenter requested that processing of the requested permit be delayed until further air quality data is collected. A commenter stated that there is no monitoring going on at the facility now. A comment was received concerning the emissions from the facility and the need for monitoring in 5, 10, & 15-mile increments.

Monitoring stations in South Carolina’s ambient air monitoring network are specifically located to represent ambient pollution levels in a diverse set of geographical areas. In accordance with 40 CFR Part 58 Appendix D, ambient air monitors are required to be placed in areas with the highest population, or where the highest pollutant concentrations are expected to occur. If an ambient monitor located in an area of higher emissions or concentrations demonstrates the air pollutant concentrations are lower than the levels set by the national health-protective standards, then it is reasonable to expect that the air pollutant concentrations in other areas with lower emissions or concentrations will also be lower than the national standards.

The Department has operated an air quality monitoring network in South Carolina since 1959. These monitors and samplers are used to assess South Carolina’s air quality and determine compliance with the national and state ambient air quality standards. All monitors in the state show attainment of (or compliance with) all current air quality standards. The Department annually reviews the monitoring network, and seeks input from the public, to make sure the minimum requirements and the needs of the air program are met. Current local air quality conditions can be obtained at www.airnow.gov.

As part of the permit application process the applicant must demonstrate to the Department that the emissions from the operation of the proposed furnace will not cause a violation of the ambient air standards (NAAQS) that have been established to be protective of the public health and environment. One method used for this

demonstration is the use of computer modeling to determine the worst-case offsite concentrations of air pollutants. A facility may also demonstrate it will not violate the NAAQS by demonstrating the emissions are below de minimis levels at which the Department has determined will not cause a violation. The emissions from the proposed furnace are estimated to be less than those levels that require a computer modeling analysis or the need to conduct additional ambient monitoring. The facility is also exempt from air quality analysis for air toxics because it is subject to federal MACT standards under Subpart RRR.

Source Monitoring and Testing – Comments were received about the monitoring of the furnace’s operation.

The monitoring, testing, recordkeeping, and reporting requirements in an air permit are the responsibility of the facility. The facility may perform these requirements of the permit itself or outsource them to a contractor. The reporting and self-certification requirements of this permit are consistent with those applicable to other similar permitted facilities across the state. These reporting and certification requirements are required by federal and/or state regulations and are the accepted practice in environmental permitting across the state. The Department will review all compliance information submitted by the facility (or obtained on site) to determine compliance and take enforcement action against a permitted facility for violations occurring from exceedances, inaccurate reports, or certifications, as appropriate.

The facility is required by the MACT standard to test the source. The test is to be performed within the first 180 days and must follow the requirements of Subpart RRR and state source testing regulations. The test is required to show compliance with the emission limits for PM, HCl and Dioxin/Furans required by the MACT standard.

One comment was received that new facilities routinely have more issues during start up and that the reporting during the first 12 months should be more frequent than the draft permit required. The Department has modified the permit to increase the frequency of the monitoring and reporting, to include daily recordkeeping and monthly reporting for the first twelve months from initial start-up.

Notification Process – Comments were received regarding the notification process and how it should be performed.

Department regulations dictate the requirements for notifying the public of permit

proceedings. The Department adhered to these public participation requirements in providing notice of the draft Adams Scrap permit. This included placing the draft permit on notice for a thirty-day period. In addition, the Bureau of Air quality maintains a list of citizens that have requested to be specifically notified when air permits are public noticed in their area. Any citizen wishing to be placed on this list can send the request to airPNComments@dhec.sc.gov.

The permit required a Public Notice period and during that period there was a request for a Public Meeting. A Public Meeting was scheduled and held on October 18, 2018. After the Public Meeting the comment period was reopened until 5:00 PM October 26, 2018.

Inclusive Among DHEC Agencies - A comment was received to the effect that DHEC should be more inclusive in involving other bureaus or programs within the Department.

Permitting decisions are made by the department bureau or program responsible for implementation and enforcement of the relevant regulations and permit requirements. The Department coordinates its efforts between its multiple bureaus and regional offices especially when a project may require multiple permits. The Department also works closely with other state and local agencies to address citizen concerns, as needed.

More Emission Controls - A comment was received that there should be more emission control than just a baghouse.

See response under "Furnace Operation/Control Device/MACT Requirements" above. The federal MACT standard specifies the requirements for controlling emissions. For a group 1 furnace the MACT standard requires that a baghouse be used with lime injection to control emissions of PM and HCl. The facility will be required to demonstrate that the control devices in place will meet all required emission limits. If these emission limits cannot be met, additional control devices may be required.

Lead - A comment was received concerning lead exposure from the furnace melting aluminum, which has paint applied to it.

Lead emissions from the furnace based on emission factors provided by the consultant are estimated to be 0.00001 lbs/hr which equates to 0.000044 tons/year.

The EPA requires facilities that have actual lead emissions of ½ ton per year (TPY) or more to install and operate ambient air lead monitors around the site. The basis for this requirement is that emissions lower than the ½ TPY threshold would not cause a violation of the federal ambient lead standard. The actual emissions from Adams Scrap are expected to be far less than ½ tons per year.

Fires/Explosions – Comments were received that pertained to fires at the facility.

The Fire Department and the Department should be contacted promptly when fires or explosions are observed at any regulated facility. The Department has guidelines for responding to complaints within 24 to 48 hours.

Open burning is prohibited by regulations except under certain conditions. The draft permit was modified to add a condition to clearly specify that the facility must comply with the Department's open burning regulations at S.C. Regulation 61-62.2.

For more information the Department's process for responding to complaints and the Department's previous investigation concerning open burning at the facility, see response above under "Inspection and Compliance."

Request for Second Meeting - A comment was received requesting another meeting to address all concerns and have the appropriate people there to answer questions.

Although applicable regulations do not require the Department to hold a public meeting on draft construction permits, the Department elected to hold a public meeting to hear concerns and answer questions about the Adams Scrap project on October 18, 2018. The Department had representatives from the central office in Columbia and the Spartanburg and Greenville regional offices. There have been no significant changes to the proposed project since the October 18, 2018, public meeting. The Department also extended the close of the comment period for one week after the meeting. Therefore, the Department declined to hold a second meeting.

Location of the Facility and Effects on Property Value - Comments were received regarding the location of the facility being next to a residential area and impact on property value.

The Department's permitting decisions are based on the Department's technical review of an application and the regulatory requirements in place at the time of the Department's review. The Department cannot dictate where a facility desires to locate and does not have the regulatory authority to consider current or future property values when making permitting decisions. Air quality permitting decisions are made based on state and federal air quality regulations.

General Opposition – SC DHEC received comments requesting denial of the permit.

The Department's permitting decisions are based on the Department's technical review of an application and the regulatory requirements in place at the time of the Department's review. These regulations are established to be protective of public health and the environment. The permitting process included an in-depth analysis to verify all applicable air regulations and emission limitations will be met by the Adams Scrap facility when operated in compliance with the permit terms and conditions.

After review of the application, the additional information the Department requested from the facility as part of its review process, and the additional conditions that have been added to the draft permit in response to public comments and concerns, the Department has determined that the Adams Scrap facility meets the requirements for issuance of the air quality permit issued.

In accordance with Section 48-1-100(A) of the South Carolina Pollution Control Act the Department must issue a permit if an applicant submits a complete permit application and demonstrates the proposed source will meet all applicable regulations and standards. The Department's Environmental Protection Fees regulation (S.C. Regulation 61-30) establishes time schedules for timely action on permit applications for construction permits. Therefore, the Department may not hold a permit application indefinitely when a facility has submitted the required information, and the Department has reviewed such information as well as information from the public and determined that all applicable requirements for issuance of the permit have been satisfied.