

ALLEGHENY COUNTY HEALTH DEPARTMENT



AIR QUALITY PROGRAM
301 39th Street, Bldg. #7
Pittsburgh, PA 15201-1891

Title V Operating Permit
&
Federally Enforceable State Operating Permit

Issued To: Braddock Recovery, Inc.

ACHD Permit #: 0265

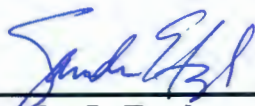
Facility: Braddock Recovery, Inc.
1300 Braddock Avenue
Braddock, PA 15104

Date of Issuance: October 24, 2016

Expiration Date: October 23, 2021

Renewal Date: April 24, 2021.

Issued By:


Sandra L. Etzel
Air Pollution Control Manager

Prepared By:

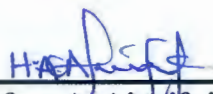

Hafeez A. Ajenifuja
Air Quality Engineer

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AMENDMENTS:

DATE: SECTION:



I. CONTACT INFORMATION

Facility Location: **Braddock Recovery, Inc.**
1300 Braddock Avenue
Braddock, PA 15104

Permittee/Owner: **Braddock Recovery, Inc., a subsidiary of HARSCO Corp.**
300 Seven Fields Blvd
Seven Fields, PA 16046

Responsible Official: **Glenn Hundertmark**
Title: Manager Environmental Control
Company: HARSCO Corp
Address: 300 Seven Fields Blvd, Suit 300
Seven Fields, PA 16046

Telephone Number: (724) 741-6662
Fax Number: (724) 741-6696
E-mail Address: ghundertmark@harsco.com

Facility Contact: Michael Buvalla
Title: Plant Manager
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Fax Number: (724) 741-6696
E-mail Address: mbuvalla@harsco.com

AGENCY ADDRESSES:

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ACHD Contact: **Chief Engineer**
Allegheny County Health Department
Air Quality Program
301 39th Street, Building #7
Pittsburgh, PA 15201-1891

EPA Contact: **Enforcement Programs Section (3AP12)**
USEPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

II. FACILITY DESCRIPTION

Braddock Recovery, Inc. (Braddock Recovery) is located on the US Steel - Edgar Thompson site. This facility receives waste products from US Steel, including furnace flue dust, slag and sludge, mill scale, and coke fines, dries them in a rotary kiln fired with coke oven gas, combines them with lime, cement, sodium silicate, water, bentonite and molasses in a wet mixing process in two pugmills, and forms the moist mix into briquettes. These finished briquettes are piled on-site with a radial stacker and then loaded onto railcars and sent back to US Steel to be used in the furnaces. The raw materials are loaded into the first stage of the process with a front-end loader. The front-end loader loads finished briquettes onto a conveyor and then into the railcars. Materials are moved through the entire process by a series of conveyors. The rotary kiln is controlled by a cyclone and a fabric filter. The particulate removed with these control devices is sent back to screw conveyor (S008). A vibrating screen is used just after the kiln to remove particles that are too large. Another vibrating screen is used at the end of the process to separate fine particles from the finished briquettes. These fines are then re-directed via conveyor to the mixers. The front-end loader loads finished briquettes onto a conveyor and then into the railcars. There are paved roadways and storage piles on-site. Fugitive particulate emissions from the storage piles are controlled by watering. Fugitive particulate emissions from the unpaved roadways are controlled with watering for dust control. Most operations occur in enclosed spaces.

The facility, which is located in Braddock, Pennsylvania, is a minor source of all criteria pollutants and Hazardous Air Pollutant (HAPs), as defined in Section 2101.20 of Article XXI. However, the facility is considered a major source based on operating, managing or supporting the United States Steel- Edgar Thomson Plant "Waste Product Recycling and Briquetting Process.

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

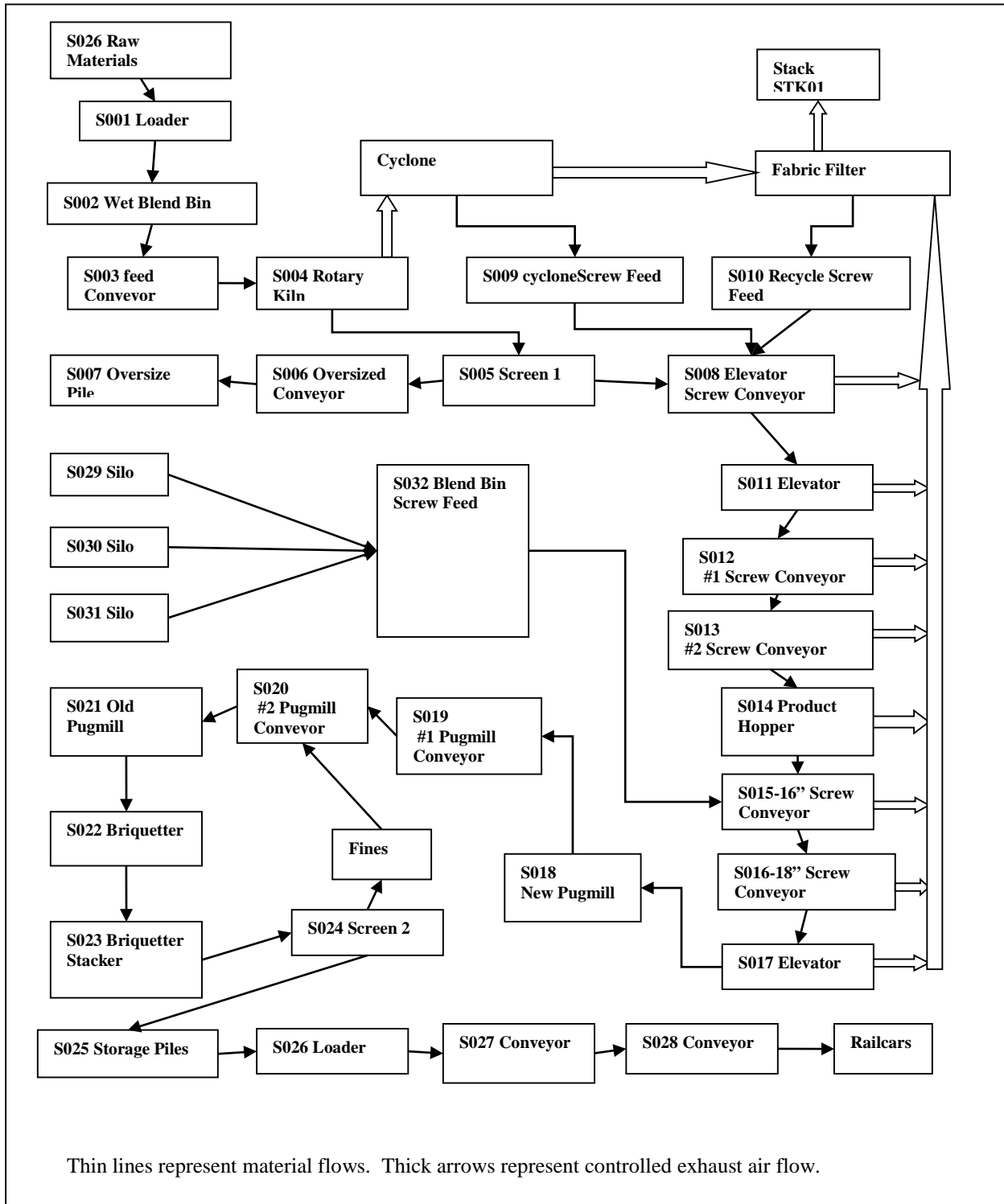
TABLE II-1 - Emission Unit Identification

I.D.	SOURCE DESCRIPTION	CONTROL DEVICE(S)	MAXIMUM DESIGN RATE	FUEL/RAW MATERIAL	STACK I.D.
P001	Two (2) Pugmills	None	50 tons/hr	Sludge, Mill Scale, Coke Breeze, Flue Dust, Lime & Additives	None
P002	Two (2) Screen	None	50 tons/hr	Furnace Flue Dust, Slag and Sludge, Mill Scale Coke Fines	None
P003	Two (2) Front End Loader	None	50 tons/hr	Furnace Flue Dust, Slag and Sludge, Mill Scale Coke Fines	None
P004	Twenty One (21) Material Transfer Points	Baghouse	50 tons/hr	Sludge, Mill Scale, Coke Breeze, Flue Dust	Stack 01
P005	Rotary Kiln Dryer	Baghouse and Cyclone	50 tons/hr	Sludge, Mill Scale, Coke Breeze, Flue Dust	Stack 01

**FACILITY DESCRIPTION****Braddock Recovery, Inc.
Title V Operating Permit #0265**

I.D.	SOURCE DESCRIPTION	CONTROL DEVICE(S)	MAXIMUM DESIGN RATE	FUEL/RAW MATERIAL	STACK I.D.
P006	Three (3) Storage Silos	Bin Vent Filter	190 tons/hr, Combined	Cement, bentonite, lime	None
F001	Storage Piles	None	438,000 tons/yr	Sludge, Mill Scale, Coke Breeze, Flue Dust	None
F002	Roads and Vehicles	Watering & Sweeping	0.40 mi-Unpaved; 500 Sq. Ft.Acres Parking Lot	N/A	None

Process Flow Diagram



DECLARATION OF POLICY

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

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

III. GENERAL CONDITIONS - Major Source

1. Prohibition of Air Pollution (§2101.11)

It shall be a violation of this permit to fail to comply with, or to cause or assist in the violation of, any requirement of this permit, or any order or permit issued pursuant to authority granted by Article XXI. The permittee shall not willfully, negligently, or through the failure to provide and operate necessary control equipment or to take necessary precautions, operate any source of air contaminants in such manner that emissions from such source:

- a. Exceed the amounts permitted by this permit or by any order or permit issued pursuant to Article XXI;
- b. Cause an exceedance of the ambient air quality standards established by Article XXI §2101.10; or
- c. May reasonably be anticipated to endanger the public health, safety, or welfare.

2. Definitions (§2101.20)

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

3. Conditions (§2102.03.c)

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

4. Certification (§2102.01)

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

5. Transfers (§2102.03.e)

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

6. Term (§2103.12.e, §2103.13.a, §2103.23(b))

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

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

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

8. Property Rights (§2103.12.f.4)

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

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

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

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

10. Modification of Section 112(b) Pollutants which are VOCs or PM₁₀ (§2103.12.f.7)

Except where precluded under the Clean Air Act or federal regulations promulgated under the Clean Air Act, if this permit limits the emissions of VOCs or PM₁₀ but does not limit the emissions of any hazardous air pollutants, the mixture of hazardous air pollutants which are VOCs or PM₁₀ can be modified so long as no permit emission limitations are violated. A log of all mixtures and changes shall be kept and reported to the Department with the next report required after each change.

11. Right to Access (§2103.12.h.2)

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

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

12. Certification of Compliance (§2103.12.h.5, §2103.22.i.1)

- a. The permittee shall submit on an annual basis, certification of compliance with all terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification of compliance shall be made consistent with General Condition 4 above and shall include the following information at a minimum:
 - 1) The identification of each term or condition of the permit that is the basis of the certification;
 - 2) The compliance status;
 - 3) Whether any noncompliance was continuous or intermittent;
 - 4) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with the provisions of this permit; and
 - 5) Such other facts as the Department may require to determine the compliance status of the source.
- b. All certifications of compliance must be submitted to the Department by May 31 of each year for the time period beginning April 1 of the previous year and ending March 31 of the same year. The next report shall be due May 31, 2017 for the time period beginning on the issuance date of this permit through March 31, 2017.

- c. The permittee shall submit all compliance certifications to the Administrator as well as the Department. Compliance certifications may be emailed to the Administrator at [R3 APD Permits@epa.gov](mailto:R3_APD_Permits@epa.gov) in lieu of mailing a hard copy.

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

- a. The permittee shall maintain records of required monitoring information that include the following:
- 1) The date, place as defined in the permit, and time of sampling or measurements;
 - 2) The date(s) analyses were performed;
 - 3) The company or entity that performed the analyses;
 - 4) The analytical techniques or methods used;
 - 5) The results of such analyses; and
 - 6) The operating parameters existing at the time of sampling or measurement.
- b. The permittee shall maintain and make available to the Department, upon request, records including computerized records that may be necessary to comply with the reporting and emission statements in Article XXI §2108.01.e. Such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

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

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

15. Reporting Requirements (§2103.12.k)

- a. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the Responsible Official.
- b. Prompt reporting of deviations from permit requirements is required, including those attributable to upset conditions as defined in this permit and Article XXI §2108.01.c, the probable cause of such deviations, and any corrective actions or preventive measures taken.
- c. All reports submitted to the Department shall comply with the certification requirements of General Condition 4 above.
- d. Semiannual reports required by this permit shall be submitted to the Department as follows:
- 1) One semiannual report is due by October 30 of each year for the time period beginning April 1 and ending September 30.
 - 2) One semiannual report is due by April 30 of each year for the time period beginning October 1 of the previous year and ending March 31
 - 3) The next semiannual report shall be due October 30, 2016 for the time period beginning on

the issuance date of this permit through September 30, 2016.

16. Severability Requirement (§2103.12.1)

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

17. Existing Source Reactivations (§2103.13.d)

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

18. Administrative Permit Amendment Procedures (§2103.14.b, §2103.24.b)

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

19. Revisions and Minor Permit Modification Procedures (§2103.14.c, §2103.24.a)

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

20. Significant Permit Modifications (§2103.14.d)

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

21. Duty to Comply (§2103.12.f.1, §2103.22.g)

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

22. Renewals (§2103.13.a. & b., §2103.23.a. & b.)

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

- b. If a timely and complete application for an Operating Permit renewal is submitted, consistent with Article XXI Part C Subparts 1 and 2, but the Department, through no fault of the applicant, has failed to issue or deny the renewal permit before the end of the term of the previous permit, then the permit shall not expire until the renewal permit has been issued or denied and any applicable permit shield shall extend beyond the original permit term until final action on the renewal application. Failure of the Department to issue or deny a permit by the renewal date shall be an appealable action. The Court of Common Pleas may require that the Department take action on an application without further delay.

23. Reopenings for Cause (§2103.15, §2103.25.a, §2103.12.f.3)

- a. This permit shall be reopened and reissued under any of the following circumstances:
- 1) Additional requirements under the Clean Air Act become applicable to a major source with a remaining permit term of three (3) or more years. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended solely due to the failure of the Department to act on a permit renewal application in a timely fashion.
 - 2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.
 - 3) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
 - 4) The Administrator or the Department determines that this permit must be reissued or revoked to assure compliance with the applicable requirements.
- b. This permit may be modified; revoked, reopened, and reissued; or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in this permit.

24. Reopenings for Cause by the EPA (§2103.25.b)

This permit may be modified, reopened and reissued, revoked or terminated for cause by the EPA in accordance with procedures specified in Article XXI §2103.25.b.

25. Annual Operating Permit Administration Fee (§2103.40)

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

26. Annual Major Source Emissions Fees Requirements (§2103.41)

No later than September 1 of each year, the permittee shall pay an annual emission fee in accordance with

Article XXI §2103.41 for each ton of a regulated pollutant (except for carbon monoxide) actually emitted from the source. The permittee shall not be required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant. The emission fee shall be increased in each year after 1995 by the percentage, if any, by which the Consumer Price Index for the most recent calendar year exceeds the Consumer Price Index for the previous calendar year.

27. Other Requirements not Affected (§2104.08, §2105.02)

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

28. Termination of Operation (§2108.01.a)

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

29. Emissions Inventory Statements (§2108.01.e & g)

- a. Emissions inventory statements in accordance with Article XXI §2108.01.e shall be submitted to the Department by March 15 of each year for the preceding calendar year. The Department may require more frequent submittals if the Department determines that more frequent submissions are required by the EPA or that analysis of the data on a more frequent basis is necessary to implement the requirements of Article XXI or the Clean Air Act.
- b. The failure to submit any report or update within the time specified, the knowing submission of false information, or the willful failure to submit a complete report shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

30. Tests by the Department (§2108.02.d)

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

31. Other Rights and Remedies Preserved (§2109.02.b)

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

32. Enforcement and Emergency Orders (§2109.03, §2109.05)

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

33. Penalties, Fines, and Interest (§2109.07.a)

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

34. Appeals (§2109.10)

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

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

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

36. Permit Shield (§2103.22)

- a. The permittee's compliance with the conditions of this permit shall be deemed compliance with all major source applicable requirements as of the date of permit issuance, provided that:
 - 1) Such major source applicable requirements are included and are specifically identified in the permit; or
 - 2) The Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- b. Nothing in Article XXI §2103.22.e or the Title V Permit shall alter or affect the following:
 - 1) The provisions of Section 303 of the Clean Air Act and the provisions of Article XXI

- regarding emergency orders, including the authority of the Administrator and the Department under such provisions;
- 2) The liability of any person who owns, operates, or allows to be operated, a source in violation of any major source applicable requirements prior to or at the time of permit issuance;
 - 3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; or
 - 4) The ability of the EPA or the County to obtain information from the permittee pursuant to Section 114 of the Clean Air Act, the provisions of Article XXI and State law.
- c. Unless precluded by the Clean Air Act or regulations therein, final action by the Department on administrative amendments, minor and significant permit modifications, and operational flexibility changes shall be covered by the permit shield provided such amendments, modifications and changes meet the relevant requirements of Article XXI.
- d. The permit shield authorized under Article XXI §2103.22 is in effect for the permit terms and conditions as identified in this permit.

37. Circumvention (§2101.14)

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

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

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

39. Effect (§2102.03.g.)

Except as specifically otherwise provided under Article XXI, Part C, issuance of a permit pursuant to

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

40. Installation Permits (§2102.04.a.1.)

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

- a. The Department has first issued an Installation Permit for such source or equipment; or
- b. Such action is solely a reactivation of a source with a current Operating Permit, which is approved under §2103.13 of this Article; or
- c. Such source is exempt under subsection a.5 of this section.

PERMIT SHIELD IN EFFECT

IV. SITE LEVEL TERMS AND CONDITIONS

1. Visible Emissions (§2104.01.a)

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

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

2. Odor Emissions (§2104.04) (County-only enforceable)

No person shall operate, or allow to be operated, any source in such manner that emissions of malodorous matter from such source are perceptible beyond the property line.

3. Materials Handling (§2104.05)

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

4. Operation and Maintenance (§2105.03)

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

5. Open Burning (§2105.50)

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

6. Shutdown of Control Equipment (§2108.01.b)

- a. In the event any air pollution control equipment is shut down for reasons other than a breakdown, the person responsible for such equipment shall report, in writing, to the Department the intent to shut down such equipment at least 24 hours prior to the planned shutdown. Notwithstanding the submission of such report, the equipment shall not be shut down until the approval of the Department is obtained; provided, however, that no such report shall be required if the source(s) served by such air pollution control equipment is also shut down at all times that such equipment is shut down.
- b. The Department shall act on all requested shutdowns as promptly as possible. If the Department

does not take action on such requests within ten (10) calendar days of receipt of the notice, the request shall be deemed denied, and upon request, the owner or operator of the affected source shall have a right to appeal in accordance with the provisions of Article XI.

- c. The prior report required by Site Level Condition IV.6.a above shall include:
- 1) Identification of the specific equipment to be shut down, its location and permit number (if permitted), together with an identification of the source(s) affected;
 - 2) The reasons for the shutdown;
 - 3) The expected length of time that the equipment will be out of service;
 - 4) Identification of the nature and quantity of emissions likely to occur during the shutdown;
 - 5) Measures, including extra labor and equipment, which will be taken to minimize the length of the shutdown, the amount of air contaminants emitted, or the ambient effects of the emissions;
 - 6) Measures which will be taken to shut down or curtail the affected source(s) or the reasons why it is impossible or impracticable to shut down or curtail the affected source(s) during the shutdown; and
 - 7) Such other information as may be required by the Department.

7. Breakdowns (§2108.01.c)

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

- c. Notices required shall be updated, in writing, as needed to advise the Department of changes in the information contained therein. In addition, any changes concerning potentially toxic or hazardous emissions shall be reported immediately. All additional information requested by the Department shall be submitted as expeditiously as practicable.
- d. Unless otherwise directed by the Department, the Department shall be notified whenever the condition causing the breakdown is corrected or the equipment or other source is placed back in operation by no later than 9:00 AM on the next County business day. Within seven (7) days thereafter, written notice shall be submitted pursuant to Paragraphs a and b above.
- e. Breakdown reporting shall not apply to breakdowns of air pollution control equipment which occur during the initial startup of said equipment, provided that emissions resulting from the breakdown are of the same nature and quantity as the emissions occurring prior to startup of the air pollution control equipment.
- f. In no case shall the reporting of a breakdown prevent prosecution for any violation of this permit or Article XXI.

8. Cold Start (§2108.01.d)

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

9. Monitoring of Malodorous Matter Beyond Facility Boundaries (§2104.04) (County-Only Enforceable)

The permittee shall take all reasonable action as may be necessary to prevent malodorous matter from becoming perceptible beyond facility boundaries. Further, the permittee shall perform such observations as may be deemed necessary along facility boundaries to insure that malodorous matter beyond the facility boundary in accordance with Article XXI §2107.13 is not perceptible and record all findings and corrective action measures taken.

10. Orders (§2108.01.f)

In addition to meeting the requirements of General Condition III.28 and Site Level Conditions IV.6 through IV.10, inclusive, the person responsible for any source shall, upon order by the Department, report to the Department such information as the Department may require in order to assess the actual and potential contribution of the source to air quality. The order shall specify a reasonable time in which to make such a report.

11. Violations (§2108.01.g)

The failure to submit any report or update thereof required by General Condition III.28 and Site Level Conditions IV.6 through IV.10 above, inclusive, within the time specified, the knowing submission of false information, or the willful failure to submit a complete report shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

12. Emissions Testing (§2108.02)

- a. On or before December 31, 1981, and at two-year intervals thereafter, any person who operates, or allows to be operated, any piece of equipment or process which has an allowable emission rate, of 100 or more tons per year of particulate matter, sulfur oxides or volatile organic compounds shall conduct, or cause to be conducted, for such equipment or process such emissions tests as are necessary to demonstrate compliance with the applicable emission limitation(s) of this permit and shall submit the results of such tests to the Department in writing. Emissions testing conducted pursuant to this section shall comply with all applicable requirements of Article XXI §2108.02.e.
- b. **Orders.** In addition to meeting the requirements of Site Level Condition IV.12.a above, the person responsible for any source shall, upon order by the Department, conduct, or cause to be conducted, such emissions tests as specified by the Department within such reasonable time as is specified by the Department. Test results shall be submitted in writing to the Department within 20 days after completion of the tests, unless a different period is specified in the Department's order. Emissions testing shall comply with all applicable requirements of Article XXI §2108.02.e.
- c. **Tests by the Department.** Notwithstanding any tests conducted pursuant to Site Level Conditions IV.12.a and IV.12.b above, the Department or another entity designated by the Department may conduct emissions testing on any source or air pollution control equipment. At the request of the Department, the person responsible for such source or equipment shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance of such tests.
- d. **Testing Requirements.** No later than 45 days prior to conducting any tests required by this permit, the person responsible for the affected source shall submit for the Department's approval a written test protocol explaining the intended testing plan, including any deviations from standard testing procedures, the proposed operating conditions of the source during the test, calibration data for specific test equipment and a demonstration that the tests will be conducted under the direct supervision of persons qualified by training and experience satisfactory to the Department to conduct such tests. In addition, at least 30 days prior to conducting such tests, the person responsible shall notify the Department in writing of the time(s) and date(s) on which the tests will be conducted and shall allow Department personnel to observe such tests, record data, provide pre-weighed filters, analyze samples in a County laboratory and to take samples for independent analysis. Test results shall be comprehensively and accurately reported in the units of measurement specified by the applicable emission limitations of this permit.
- e. The permittee shall submit a notification of intent to conduct a performance test to satisfy 40 CFR Part 63 Subpart FFFFF requirements at least 60 calendar days before the performance test is scheduled to begin. [§63.7840(d)]
- f. Test methods and procedures shall conform to the applicable reference method set forth in this permit or Article XXI Part G, or where those methods are not applicable, to an alternative

sampling and testing procedure approved by the Department consistent with Article XXI §2108.02.e.2.

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

13. Abrasive Blasting (§2105.51)

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

14. Asbestos Abatement (§2105.62, §2105.63)

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

15. Protection of Stratospheric Ozone (40 CFR Part 82)

- a. Permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
- 1) All containers in which a Class I or Class II substance is stored or transported, all products containing a Class I substance, and all products directly manufactured with a process that uses a Class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106;
 - 2) The placement of the required warning statement must comply with the requirements pursuant to §82.108;
 - 3) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110; and
 - 4) No person may modify, remove or interfere with the required warning statement except as described in §82.112.
- b. Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F:
- 1) Persons opening appliances for maintenance, service, repair or disposal must comply with the prohibitions and required practices pursuant to §82.154 and §82.156;
 - 2) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158;

- 3) Persons maintaining, servicing, repairing or disposing of appliances, must be certified by an approved technician certification program pursuant to §82.161;
 - 4) Persons maintaining, servicing, repairing or disposing of appliances must certify to the Administrator of the U.S. Environmental Protection Agency pursuant to §82.162;
 - 5) Persons disposing of small appliances, motor vehicle air conditioners (MVAC) and MVAC-like appliances, must comply with the record keeping requirements pursuant to §82.166;
 - 6) Owners of commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156; and
 - 7) Owners or operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- c. If the permittee manufactures, transforms, destroys, imports or exports a Class I or Class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A (Production and Consumption Controls).
- d. If the permittee performs a service on a motor vehicle that involves an ozone-depleting substance, refrigerant or regulated substitute substance in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B (Servicing of Motor Vehicle Air Conditioners).
- e. The permittee may switch from any ozone-depleting substance to any alternative that is listed as acceptable in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G.

16. Volatile Organic Compound Storage Tanks (§2105.12.a)

No person shall place or store, or allow to be placed or stored, a volatile organic compound having a vapor pressure of 1.5 psia or greater under actual storage conditions in any aboveground stationary storage tank having a capacity equal to or greater than 2,000 gallons but less than or equal to 40,000 gallons, unless there is in operation on such tank pressure relief valves which are set to release at the higher of 0.7 psig of pressure or 0.3 psig of vacuum or at the highest possible pressure and vacuum in accordance with State or local fire codes, National Fire Prevention Association guidelines, or other national consensus standard approved in writing by the Department. Petroleum liquid storage vessels that are used to store produced crude oil and condensate prior to lease custody transfer are exempt from these requirements.

17. Permit Source Premises (§2105.40)

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

- b. **Deposition on Other Premises.** Visible emissions from any solid or liquid material that has been deposited by any means from a source onto any other premises shall be considered emissions from such source within the meaning of Site Level Condition IV.17.a above.

18. Parking Lots and Roadways (§2105.42)

- a. The permittee shall not maintain for use, or allow to be used, any parking lot over 50 parking spaces or used by more than 50 vehicles in any day or any other roadway carrying more than 100 vehicles in any day or 15 vehicles at any hour in such manner that emissions from such parking lot or roadway:
- 1) Are visible at or beyond the property line;
 - 2) Have an opacity of 20% or more for a period or periods aggregating more than three (3) minutes in any 60 minute period; or
 - 3) Have an opacity of 60% or more at any time.
- b. Visible emissions from any solid or liquid material that has been deposited by any means from a parking lot or roadway onto any other premises shall be considered emissions from such parking lot or roadway.
- c. Site Level Condition IV.18.a above shall apply during any repairs or maintenance done to such parking lot or roadway.
- d. Notwithstanding any other provision of this permit, the prohibitions of Site Level Condition IV.18 may be enforced by any municipal or local government unit having jurisdiction over the place where such parking lots or roadways are located. Such enforcement shall be in accordance with the laws governing such municipal or local government unit. In addition, the Department may pursue the remedies provided by Article XXI §2109.02 for any violations of Site Level Condition IV.18.

19. Permit Source Transport (§2105.43)

- a. No person shall transport, or allow to be transported, any solid or liquid material outside the boundary line of any source for which a permit is required by the Article XXI, Part C in such manner that there is any visible emission, leak, spill, or other escape of such material during transport.
- b. Notwithstanding any other provision of this permit, the prohibitions of Site Level Condition IV.19 may be enforced by any municipal or local government unit having jurisdiction over the place where such visible emission, leak, spill, or other escape of material during transport occurs. Such enforcement shall be in accordance with the laws governing such municipal or local government unit. In addition, the Department may pursue the remedies provided by Article XXI §2109.02 for any violation of Site Level Condition IV.19.

20. Construction and Land Clearing (§2105.45)

- a. No person shall conduct, or allow to be conducted, any construction or land clearing activities in such manner that the opacity of emissions from such activities:
- 1) Equal or exceed 20% for a period or periods aggregating more than three (3) minutes in any

- sixty (60) minute period; or
- 2) Equal or exceed 60% at any time.

- b. Notwithstanding any other provision of this permit, the prohibitions of Site Level Condition IV.20 may be enforced by any municipal or local government unit having jurisdiction over the place where such construction or land clearing activities occur. Such enforcement shall be in accordance with the laws governing such municipal or local government unit. In addition, the Department may pursue the remedies provided by Article XXI §2109.02 for any violations of Site Level Condition IV.20.

21. Mining (§2105.46)

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

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

22. Demolition (§2105.47)

- a. No person shall conduct, or allow to be conducted, any demolition activities in such manner that the opacity of the emissions from such activities equal or exceed 20% for a period or periods aggregating more than three (3) minutes in any 60 minute period.
- b. Notwithstanding any other provisions of this permit, the prohibitions of Site Level Condition IV.22 may be enforced by any municipal or local government unit having jurisdiction over the place where such demolition activities occur. Such enforcement shall be in accordance with the laws governing such municipal or local government unit. In addition, the Department may pursue the remedies provided by Article XXI §2109.02 for any violations of Site Level Condition IV.22.

23. Fugitive Emissions (§2105.49)

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

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

24. Episode Plans (§2106.02)

The permittee shall upon written request of the Department, submit a source curtailment plan, consistent with good industrial practice and safe operating procedures, designed to reduce emissions of air

contaminants during air pollution episodes. Such plans shall meet the requirements of Article XXI §2106.02.

25. New Source Performance Standards (§2105.05)

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

V. EMISSION UNIT LEVEL TERMS AND CONDITIONS

A. Process P001: Two (2) Pugmills

Process Description:	New and Old Pugmills
Facility ID:	S012c and S017
Max. Design Rate:	438,000 tons per year
Raw Materials:	Sludge, Mill Scale, Coke Breeze, Flue Dust, Lime + Additives
Control Device(s):	None

1. Restrictions:

- a. The new and old pugmills shall operate at a rate of no greater than 50 tons per hour or 438,000 tons per year. (§2102.04.e, §2104.05)
- b. The permittee shall minimize drop heights when loading or unloading sludge, mill scale, coke breeze, flue dust and lime materials into pugmills (§2102.04.e; §2103.12.a.2.B).
- c. The permittee shall minimize visible emissions due to the operation of the pugmills. (§2102.04.e; §2103.12.a.2.D)

2. Testing Requirements:

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.12 (§2103.12.h.1)

3. Monitoring Requirements:

- a. The permittee shall inspect the pugmills weekly in order to determine compliance with conditions V.A.1.a through V.A.1.c when the pugmills are in operation. (§2102.04.e; §2103.12.a.2.B)
- b. Notations of visible emissions from the pugmills shall be performed once per week during normal daylight operations using method 22. A trained individual shall record whether any emissions are observed and whether these emissions extend beyond the facility property line. (§2103.12.h.1; §2102.04.e)

4. Record Keeping Requirements:

- a. The permittee shall keep and maintain a maintenance log for the operation. The records shall contain at a minimum: [§2103.12.j; §2102.04.e]
 - 1) The amount of raw materials processed during operation;
 - 2) The date and result of inspections required by condition V.A.3 above;
 - 3) Any mechanical repairs or adjustments made.
- b. The permittee shall record episodes of non-compliance with the terms and conditions of this permit, and corrective actions taken upon occurrence of such non-compliance. (§2102.04.b.6, §2103.12.j)

- c. Records shall be kept by the permittee for at least five (5) years. (§2103.12.j)

5. Reporting Requirements:

- a. The permittee shall submit semiannual reports in accordance with General Condition III.15. Such reports shall include at a minimum: [§2103.12.k]
- 1) Calendar dates covered in the reporting period;
 - 2) Types and amount of raw materials processed during operation (monthly and rolling 12-month); and
 - 3) Records of maintenance performed as a result of inspections required by condition V.A.3.a above.
- b. The permittee shall report all instances of non-compliance with Condition V.A.1 above and Condition V.A.4 below, along with all corrective action(s) taken to restore compliance, to the Department every six (6) months. (§2103.12.k)
- c. Reporting instances of non-compliance with the terms and conditions of this permit does not relieve the permittee of the requirement to report breakdowns per Site Level Condition IV.7 above. (§2103.12k)

6. Work Practice Standards:

None except as provided elsewhere.

7. Additional Requirements:

B. Process P002: Two (2) Screens

Process Description:	Screen #1 & #2
Facility ID:	S005 and S021
Max. Design Rate/Units:	50 tons/hr
Control Device(s):	None

1. Restrictions:

- a. The permittee shall ensure that the screening unit shall be operated in such a manner that no emissions are visible at or beyond the property line (§2102.04.e; §2103.12.a.2.D; §2104.05)
- b. The screening operation throughput shall not exceed 50 tons/hr and 438,000 tons per year (§2102.04.e; §2103.12.a.2.D)
- c. The permittee shall not operate or, allow to be operated the screening operation unless it is properly operated and maintained: (§2102.04.e; §2103.12.a.2.D)

2. Testing Requirements:

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

3. Monitoring Requirements:

- a. The permittee shall inspect the screening equipment and the material screened weekly to determine compliance with Conditions V.B.1.a through **Error! Reference source not found.** above. (§2103.12.i)
- b. Notations of visible emissions from screen 1 & 2 operations shall be performed once per week during normal daylight operations using method 22. A trained individual shall record whether any emissions are observed and whether these emissions extend beyond the facility property line. (§2103.12.h.1; §2102.04.e)

4. Record Keeping Requirements:

- a. The permittee shall keep and maintain the records of operation, maintenance, inspection, calibration and/or replacement of equipment: (§2103.12.j)
- b. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. (§2103.12.j)
- c. All records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. (§2103.12.j.2)

5. Reporting Requirements:

- a. The permittee shall report all instances of non-compliance with the terms and conditions of this permit, along with all corrective action(s) taken to restore compliance to the Department every six (6) months. (§2103.12.k)
- b. Reporting instances of non-compliance in accordance with condition V.F.5.a does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.7, if appropriate. (§2103.12.k.1)

6. Work Practice Standards:

None except as provided elsewhere.

C. Process P003: Two (2) Front End loader Batch Drops

Process Description:	Front End loader Batch Drops (Transfer Point)
Facility ID:	S001 & S019
Max. Design Rate/Units:	50 tons/hr
Raw Materials:	Furnace flue dust, slag and sludge, mill scale and coke fines
Control Device(s):	None

1. Restrictions:

- a. The loading equipment shall be operated in such a manner that no emissions are visible at or beyond the property line. (§2102.04.e; §2104.05; §2103.12.a.2.B)
- b. The permittee shall minimize drop heights when dumping materials into storage hopper bins and conveyors (§2102.04.e; §2103.12.a.2.B).
- c. The material throughput shall not exceed 50 tons in any one hour or 438,000 tons per twelve (12) month consecutive period (§2102.04.e; §2103.12.a.2.D)

2. Testing Requirements:

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.12 above and Article XXI §2108.02. (§2103.12.h.1; §2103.12.i; §2108.02)

3. Monitoring Requirements:

- a. Notations of visible emissions from the front end loader operations shall be performed once per week during normal daylight operations using method 22. A trained individual shall record whether any emissions are observed and whether these emissions extend beyond the facility property line. (§2103.12.h.1; §2102.04.e)

4. Record Keeping Requirements:

- a. The permittee shall record episodes of non-compliance with the terms and conditions of this permit, and corrective actions taken upon occurrence of such non-compliance. (§2103.12.j)
- b. Records shall be kept by the permittee for at least five (5) years. (§2103.12.j)

5. Reporting Requirements:

- a. The permittee shall report all instances of non-compliance with the terms and conditions of this permit, along with all corrective action(s) taken to restore compliance to the Department every six (6) months. (§2103.12.k)
- b. Reporting instances of non-compliance in accordance with condition V.C.5.a does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.7, if appropriate. (§2103.12.k.1)



**EMISSION UNIT LEVEL
TERMS AND CONDITIONS**

**Braddock Recovery, Inc.
Title V Operating Permit #0265**

6. Work Practice Standards:

None except as specified elsewhere.

D. Process P004: Twenty One (21) Material Transfer Points

Process Description:	Transfer Points 2-20
Facility ID:	S002, S003, S006 –S016, S018 S020, S022, S028 &S029
Max. Design Rate:	50 tons/hr
Raw Materials:	Sludge, Mill Scale, Coke Breeze, Flue Dust
Control Device(s):	Baghouse

1. Restrictions:

- a. The material transfer points shall be operated in such a manner that no emissions are visible at or beyond the property line. (§2103.12.g; §2103.12.a.2.B)
- b. The transfer points S012, S012a & S012b through S016, S018, S020, S022, S028 and S029 operation shall be directly vented through the system baghouse. (§2103.12.g; §2103.12.a.2.D)
- c. The permittee shall not operate or allow to be operated, the transfer points S012, S012a & S012b through S016, S018, S020, S022, S028 and S029, unless the baghouse is in operation. (§2103.12.g; 2103.12.a.2.D)
- d. The differential pressure drop across the baghouse compartment(s) shall be maintained between 3 inches w.c. and 8 inches w.c. at all times while the baghouse is in operation. (§2103.12.g; §2103.12.a.2.D)
- e. The material throughput shall not exceed 50 tons in any one hour or 438,000 tons per twelve (12) month consecutive period. (2103.12.g; §2103.12.a.2.D)

2. Testing Requirements:

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.12 above and Article XXI §2108.02. (§2103.12.h.1; §2103.12.i; §2108.02)

3. Monitoring Requirements:

- a. The permittee shall inspect the material transfer equipment weekly in order to determine compliance with conditions V.D.1.a through V.D.1.e above when the material transfer equipment is in operation. (§2103.12.i; §2103.12.a.2.B)
- b. The permittee shall provide instrumentation to monitor the differential pressure drop across the baghouse weekly to within 1/10 of an inch w.c. The instrumentation shall be maintained in good working condition at all times and be located in an easily accessible location. [§2103.12.h.1; §2103.12.i]
- c. The permittee shall perform monthly preventative maintenance inspections on the baghouse. Inspections shall include, but not be limited to: [§2103.12.I]
 - 1) Inspection of the overall collector and compartment housings, hooding, and connecting ductwork for leakage, corrosion, or dust accumulation;
 - 2) Inspection of all airlocks, and valves for proper seating, dust accumulation, leakage,

- synchronization, and operation;
 - 3) Inspection of access doors for leaks due to faulty gaskets or warping of doors and/or frames;
 - 4) Inspect the conveying equipment system and storage silos.
- d. The permittee shall perform annual preventative maintenance inspections. Inspections shall include, but not be limited to: [§2103.12.I]
- 1) Inspection of filter media for blinding, leakage, wear, slack, bag tension, loose bag clamps, or discoloration;
 - 2) Inspection of the housing for erosion or dust buildup.
- e. Bags shall be replaced and repairs shall be made as necessary. [§2103.12.i]
- f. Notations of visible emissions from the material transfer points operations shall be performed once per week during normal daylight operations using method 22. A trained individual shall record whether any emissions are observed and whether these emissions extend beyond the facility property line. (§2103.12.h.1; §2102.04.e)

4. Record Keeping Requirements:

- a. The permittee shall keep and maintain the following records for the material transfer operation and baghouse: (§2103. 12. j)
 - 1) Material throughput for the material transfer points (daily);
 - 2) The results of the inspections required by condition V.D.3.c and V.D.3.d above;
 - 3) The weekly differential pressure drop across the pages as required in condition V.D.3.b;
 - 4) Records of operation, maintenance, inspection, calibration and/or replacement of equipment;
 - 5) The date of last bag (or cartridge) replacements
- b. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. (§2103.12.j)
- c. All records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. (§2103.12.j.2)

5. Reporting Requirements:

- a. The permittee shall submit semiannual reports in accordance with General Condition III.15. Such reports shall include at a minimum: [§2103.12.a.2.B; §2103.12.k]
 - 1) Calendar dates covered in the reporting period;
 - 2) Amount of briquettes processed/produced (monthly and rolling 12-month summaries);
 - 3) Monthly minimum and maximum pressure drop recorded under condition V.D.4.a.3) above;
 - 4) Excursions outside the differential pressures specified in condition V.D.1.d;
 - 5) Records of maintenance performed as a result of inspections required by condition V.D.3.c above; and
 - 6) Non-compliance information required to be recorded by V.D.4.b
- b. Reporting instances of non-compliance in accordance with condition V.D.5.a.6) does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.7, if appropriate. (§2103.12.k.1)



6. Work Practice Standards:

The permittee shall operate and maintain the baghouse and material transfer points in accordance with the manufacturers' specification and good engineering practices by performing regular maintenance on the baghouse and material transfer points as required in condition V.D.3. (§2103.12.a.2.B; §2105.03)

E. Process P005: Rotary Dryer

Process Description: Rotary Kiln Dryer
 Facility ID: S004
 Max. Design Rate/Units: 24.59 MMBTU/hr
 Fuel: Coke Oven Gas
 Raw Materials: Briquettes for Blast Furnace and BOP Shop
 Control Device(s): One (1) Cyclone and One (1) Baghouse

1. Restrictions:

- a. Heat input to the dryer shall not exceed 24.59 MMBtu/hr. (§2103.12.a.2.D, §2103.12.g)
- b. The permittee shall not operate, or allow to be operated, the rotary kiln in such manner that unburned coke oven gas is emitted into the open air. (§2105.21)
- c. The permittee shall not flare, mix, or combust coke oven gas, or allow such gas to be flared, mixed, or combusted, unless the concentration of sulfur compounds, measured as hydrogen sulfide, in such gas is less than or equal to 35 grains per hundred dry standard cubic feet of coke oven gas. (§2105.21.h.4)
- d. The dryer operation shall be vented through the cyclone and baghouse control system at all times while the process is operating. (§2102.04.b.6; §2102.04.e; §2103.12.a.2.D)
- e. The differential pressure drop across the baghouse shall be maintained between 3 inches w.c. and 8 inches w.c at all times while the baghouse is in operation. [§2102.04.b.6; §2102.04.e]
- f. The differential pressure drop across the cyclone shall be maintained between 2 inches w.c and 6 inches w.c at all times while the cyclone is in operation. [§2102.04.b.6; §2102.04.e]
- g. The material throughput to the dryer shall not exceed 50 tons per hour or 438,000 tons per twelve (12) month consecutive period (§2103.12.a.2.D)
- h. Emissions from the rotary kiln (S004) shall not exceed the emissions limitations in Table V-E-1 below. (§2103.12.a.2.D; Installation Permit No. 93-I-0039-P)

Table V-E-1 - Emission Limitations

POLLUTANT	Hourly Emission Limit (lbs/hr)	Annual Emission Limit (tons/year) ¹
PM	1.3	5.69
PM ₁₀	1.3	5.69
SO _x	5.31	23.26
NO _x	4.11	18.0
VOC	0.81	3.55
CO	1.1	4.82

¹A year is defined as any consecutive 12-month period.

2. Testing Requirements:

- a. Within one year of permit issuance, the permittee shall conduct emissions testing on the dryer in accordance with Article XXI §2108.02 and approved EPA Methods in Appendix A of 40 CFR Part 60 for sulfur oxides, PM, NO_x, CO and VOC. (§2103.12.h.1, §2108.02.b)
- b. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.12. (§2103.12.h.1)

3. Monitoring Requirements:

- a. The permittee shall monitor the amount of coke oven gas combusted in the dryer. [§2103.12.i].
- b. The permittee shall inspect the rotary kiln weekly in order to determine compliance with conditions V.E.1.b through V.E.1.h above when the kiln is in operation. (§2103.12.h.1; §2103.12.i; Installation Permit No. 93-I-0039-P)
- c. The permittee shall monitor and record the pressure drop across the fabric filter used in conjunction with the material transfer equipment and rotary kiln on a weekly basis. (§2103.12.h.1; §2103.12.i; Installation Permit No. 93-I-0039-P)
- d. The permittee shall provide instrumentation to monitor the differential pressure drop across the cyclone weekly to within 1/10 of an inch w.c. The instrumentation shall be maintained in good working condition at all times and be located in an easily accessible location. [§2103.12.h.1; §2103.12.i]
- e. The permittee shall perform preventative maintenance inspections of the cyclone. Inspections shall include, but not be limited to: [§2103.12.i; §2105.03]
 - 1) Inspection of the hopper bottom unloading valve for leakage (monthly);
 - 2) Inspect to see if hopper unloads when valve is open (monthly);
 - 3) Inspection of the overall collector and connecting ductwork for leakage, corrosion, or dust accumulation (monthly);
 - 4) Inspect for warped or poor fitting hatches (monthly);
 - 5) Inspection of the interior parts deterioration due to corrosion and wear (annually); and
 - 6) Inspect for dents in the cyclone (from hammering on cyclone to dislodge material)

4. Record Keeping Requirements:

- a. The permittee shall keep and maintain the following records for the dryer: (§2103.12.j)
 - 1) The weekly pressure drop across the cyclone as required by condition V.E.3.d;
 - 2) The weekly pressure drop across the baghouse as required by condition V.E.3.c;
 - 3) Material throughput and the hours of operation for the dryer (daily);
 - 4) The results of the inspections required by condition V.E.3.e above;
 - 5) Records of operation, maintenance, inspection, calibration and/or replacement of equipment;
 - 6) Manufacturer's specifications.

- b. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. (§2103.12.j)
- c. All records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. (§2103.12.j.2)

5. Reporting Requirements:

- a. The permittee shall submit semiannual reports in accordance with General Condition III.15. Such reports shall include at a minimum: (§2103.12.k; §2103.12.a.2.B)
 - 1) Calendar dates covered in the reporting period;
 - 2) Amount of material processed (monthly and rolling 12-month);
 - 3) Monthly minimum and maximum pressure drop recorded under condition V.E.4.a.1) and V.E.4.a.2) above;
 - 4) Excursions outside the differential pressures specified in condition V.E.1.e;
 - 5) Records of maintenance performed as a result of inspections required by condition V.E.3.e; and
 - 6) Non-compliance information required to be recorded by V.E.4.b above.
- b. Reporting instances of non-compliance in accordance with condition V.E.5.a.6) does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.7, if appropriate. (§2103.12.k.1; §2102.04.e)

6. Work Practice Standard)

The permittee shall operate and maintain the rotary kiln, cyclone, and fabric filter in accordance with the manufacturers' specification and good engineering practices by performing regular maintenance considering the manufacturer's or operator's maintenance procedures. (§2105.03; §2103.12.a.2.D)

7. Additional Requirements

None except as provided elsewhere.

F. Process P006: Three (3) Storage Silos

Process Description: Lime Silo; Cement Silo; Bentonite/Sodium Silicate Silo
Facility ID: S023; S024; S025
Max. Design Rate/Units: 10 tons/hr; 150 tons/hr and 30 tons/hr
Raw Materials: Lime; Cement & Bentonite/Sodium Silicate
Control Device(s): Bin Vent Filter

1. Restrictions:

- a. The permittee shall control particulate emissions from the storage silos with bin vent filters at all times that the silos are in operation. (§2103.12.a.2.B; §2105.03)
- b. The truck or rail unloading equipment shall be operated in such manner that no emissions are visible at or beyond the property line. (§2104.05)

2. Testing Requirements:

- a. The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements:

- a. The permittee shall inspect the bin vent filters monthly in order to determine compliance with conditions V.F.1.a and V.F.1.b above when the storage silos are in operation. (§2103.12.h.1; §2103.12.i)
- b. The permittee shall perform weekly visual inspection of the silos exterior and interior for any deterioration or crack in order to determine compliance with conditions V.F.1.a and V.F.1.b above. (§2103.12.h.1; §2103.12.i)
- c. Notations of visible emissions from the storage silos shall be performed once per week during normal daylight operations using method 22. A trained individual shall record whether any emissions are observed and whether these emissions extend beyond the facility property line. (§2103.12.h.1; §2102.04.e)

4. Record Keeping Requirements:

- a. The permittee shall keep and maintain records of operation, maintenance, inspection, calibration and/or replacement of equipment as required in condition V.F.3: (§2103.12.j)
- b. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. (§2103.12.j)
- c. All records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. (§2103.12.j.2)

5. Reporting Requirements:

- a. The permittee shall report to the Department in accordance with General Condition III.15, the non-compliance information required to be recorded by V.F.4.b above (§2103.12.a.2.B; §2103.12.k.1)
- b. Reporting instances of non-compliance in accordance with condition V.F.5.a above does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.7, if appropriate. (§2103.12.k.1)

6. Work Practice Standard:

The permittee shall operate and maintain the bin vent filter and silos in accordance with the manufacturers' specification and good engineering practices by performing regular maintenance as required in condition V.C.3.. (§2105.03; §2103.12.a.2.D)

G. Storage Piles

Process Description:	Storage Piles
Facility ID:	S026
Max. Design Rate/Units:	438,000 tons/yr
Raw Materials:	Sludge, Mill Scale, Coke Breeze, Flue Dust
Control Device(s):	Fugitive dust control, i.e., material moisture content >10%

1. Restrictions:

- a. The permittee shall not operate, or allow to be operated; moist granulated storage piles unless fugitive particulate emission control measure are properly maintained and operated at all times. (§2105.03)
- b. The truck or rail unloading equipment shall be operated in such manner that no emissions are visible at or beyond the property line. (§2104.05)

2. Testing Requirements:

- a. The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Article XXI §2108.02. (§2103.12.h.1)

3. Monitoring Requirements:

Notations of visible emissions from storage piles shall be performed once per week during normal daylight operations using method 22. A trained individual shall record whether any emissions are observed and whether these emissions extend beyond the facility property line. (§2103.12.h.1; §2102.04.e)

4. Record Keeping Requirements:

- a. The permittee shall keep and maintain records of operation, maintenance, inspection, calibration and/or replacement of equipment. (§2103.12.j)
- b. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. (§2103.12.j)
- c. All records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. (§2103.12.j.2)

5. Reporting Requirements:

- a. The permittee shall report to the Department in accordance with General Condition III.15, the non-compliance information required to be recorded by V.G.4.b above (§2103.12.a.2.B)
- b. Reporting instances of non-compliance in accordance with condition V.G.5.a does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.7, if appropriate. (§2103.12.k.1)



6. Work Practice Standard:

All air pollution control equipment required by Article XXI or any permit or order under Article XXI, and all equivalent compliance techniques which have been approved by the Department pursuant to Article XXI, shall be properly installed, maintained, and operated consistent with good air pollution control practice. (§2105.03)

H. Plant Roads

Process Description:	Paved and Unpaved Plant Roads and Parking Areas
Facility ID:	F003
Capacity:	0 mi. Paved Roads; 0.40 mi. Unpaved Roads; 500 Sq. Ft. Acres Parking Lots
Fuel/Raw Material:	N/A
Control Method(s):	Wet Suppression; Chemical Treatment; Paved Road Sweeping

1. Restrictions:

- a. The permittee shall take actions to minimize the potential for fugitive dust emissions resulting from vehicular traffic on the facility property, including, but not limited to, the following (§2105.49):
 - 1) The periodic scraping of fine dust from haul roads;
 - 2) The use of water sprays and dust suppressants;
 - 3) Periodic street sweeping of paved roads;
 - 4) Maintain vehicle speed below ten (10) miles per hour.

- b. The permits shall not allow diesel trucks to idle on-site, except under the following conditions. (§2105.92)
 - 1) Queuing: When a vehicle, situated in a queue of other vehicles, must intermittently move forward to perform work or a service, and when shutting the vehicle engine off would impede the progress of the queue and be impracticable
 - 2) Turbo-Charged Diesel Engine Cool Down or Warm up: When the manufacturer's specifications require more time than five (5) minute limitation to cool down or warm up.
 - 3) Cold/Hot Weather:
 - i). If the outside temperature is less than 40°F, then idling is allowed for a period or periods aggregating not more than 20 minutes in any 60 minute period; or
 - ii). If the outside temperature is greater than 75°F and a vehicle is equipped with air conditioning, then idling is allowed for a period or periods aggregating not more than 20 minutes in any 60 minute period.
 - 4) Safety and Emergencies.
 - i). To verify that the vehicle is in safe operating condition and equipped as required by all provisions of law, and all equipment is in good working order, either as part of the driver's daily vehicle inspection, or as otherwise needed;
 - ii). To operate defrosters, or other equipment to ensure the safe operation of the vehicle, or as otherwise required by federal or state motor carrier safety regulations, or other local requirements; or
 - iii). Use of vehicle as an emergency vehicle.

5) Operability and Maintenance.

- i). To provide power for vehicle mounted accessory or service equipment; or
 - ii). When being operated by a mechanic for testing, servicing, repairing, or diagnostic purposes.
- c. The permittee shall not use any waste oil as a dust suppressant. (§2103.12.a.2.D)
 - d. Slag, sludge or other material deposited by trucking or other means on the paved roadways, including public highways, shall be promptly removed. (§2105.49.a.3)

2. Testing Requirements (§2103.12.h.1):

None except as specified elsewhere.

3. Monitoring Requirements (§2103.12.i):

None except as specified elsewhere.

4. Record Keeping Requirements:

- a. The permittee shall record or have access to records that list the date, time, amount of undiluted chemical dust suppressant and the dilution ratio of each application of chemical dust suppressant (§2103.12.j)
- b. The permittee shall record of the locations swept by the vacuum sweeper(s) and/or any other dust control measures taken. (§2103.12.j)
- c. The permittee shall keep weekly records of the road watering and storage pile watering. (§2103.12.a.2.B; §2103.12.j)

5. Reporting Requirements:

- a. The permittee shall prepare the dates on which chemical dust suppressant was applied, and for each date, the location(s) and the dilution ratio(s) of the application.
- b. The permittee shall report to the Department every six months, in accordance with General Condition III.15 above, all instances of non-compliance with the conditions of this permit along with corrective action taken to restore the subject equipment into compliance. If all the terms and conditions of this permit are complied with during the reporting period, then no report is necessary under this permit condition (§2103.12.k)
- c. Reporting instances of non-compliance in accordance with condition V.H.5.b above does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.7 above, if appropriate. (§2103.12.k.1)



**EMISSION UNIT LEVEL
TERMS AND CONDITIONS**

**Braddock Recovery, Inc.
Title V Operating Permit #0265**

6. Work Practice Standards (§2103.12.h.1)

None except as specified elsewhere.

VI. ALTERNATIVE OPERATING SCENARIOS

There are no alternative operating scenarios.

VII. EMISSIONS LIMITATION SUMMARY

[This section is provided for informational purposes only and is not intended to be an applicable requirement.]

The annual emission limitations for the Braddock Recovery, Inc. facilities are summarized in the following table:

**TABLE VII-1
Emission Limitations Summary
(Including Fugitive Particulate Emissions)**

POLLUTANT	ANNUAL EMISSION LIMIT (tons/year)*
Particulate Matter	96.42
PM-10	39.07
SO_x	23.26
NO_x	18.00
CO	4.82
VOC	3.55

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



VIII. MISCELLANEOUS