



Louisville Metro Air Pollution Control District
701 West Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-1465-20-F

Plant ID: 1465

Effective Date: MM/DD/2020

Expiration Date: MM/DD/2025

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Source: River Metals Recycling, LLC
2114 Metal Ln
Louisville, KY 40206

Owner: River Metals Recycling, LLC
2114 Metal Ln
Louisville, KY 40206

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve months and no later than ninety days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant: VOC
Tons/year: < 100

Application No.: See **Application and Related Documents** table.

Public Notice Date: 05/30/2020

Permit writer: Shannon Hosey

Air Pollution Control Officer
{date1}

Table of Contents

Federally Enforceable District Origin Operating Permit (FEDOOP)..... 1

Permit Revisions and Changes..... 3

Application and Related Documents 3

Abbreviations and Acronyms 4

Preamble 5

General Conditions 5

Plantwide Requirements 9

 Facility Description..... 9

 Applicable Regulations..... 9

 Plantwide Specific Conditions..... 10

 S1. Standards.....10

 S2. Monitoring and Record Keeping10

 S3. Reporting.....10

Emission Unit U1: Scrap Metal Processing..... 12

 Applicable Regulations 12

 Equipment..... 12

 Control Devices 13

 U1 Specific Conditions 14

 S1. Standards.....14

 S2. Monitoring and Record Keeping15

 S3. Reporting.....16

Emission Unit U2: Parts Washer (IA) 18

 Applicable Regulations 18

 Equipment..... 18

 U2 Specific Conditions 19

 S1. Standards.....19

 S2. Monitoring and Record Keeping20

 S3. Reporting.....21

Insignificant Activities..... 22

Attachment A - Default Emission Factors, Calculation Methodologies, & Stack Tests 24

Permit Revisions and Changes

Permit No.	Public Notice Date	Issue Date	Change Type	Description/Scope
292-03-O	NA	08/31/2003	Initial	Initial Permit Issuance
O-1465-15-M	NA	02/25/2015	Renewal	Combined 2 operating permits (292-03-O and 293-03-O) and incorporated construction permit 405-05-C into single operating permit.
O-1465-15-M (R1)	NA	07/12/2019	Revision	Corrected equipment table to remove baghouse control from EP E4 and E5 (Aluminum Shredder)
O-1465-20-F	05/30/2020	xx/xx/2020	Initial	Reclassify as a FEDOOP

Application and Related Documents

Document Number	Date	Description
122423	10/17/2019	FEDOOP Application
124317	11/12/2019	Administratively complete letter from APCD
140085	05/08/2020	Comments received from company during public comment period

Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors, published by U.S.EPA</i>
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
(M)SDS	- (Material) Safety Data Sheet
NAICS	- North American Industry Classification System
NO _x	- Nitrogen oxides
PM	- Particulate Matter
PM ₁₀	- Particulate Matter less than 10 microns
PM _{2.5}	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

- G1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
- G2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
- G3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
- G4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.
- G5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
- G6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.

- G7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
- G8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.
- G9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
- G10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM₁₀, PM_{2.5}, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; or any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.
- G11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
- G12. Unless specified elsewhere in this permit, the owner or operator shall submit semi-annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All compliance reports shall include the following per Regulation 2.17, section 3.5.
- A certification statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete", and
 - The signature and title of a responsible official of the company.
 - The semi-annual compliance reports are due on or before the following dates of each calendar year:

- | Reporting Period | Report Due Date |
|-------------------------|-------------------------------|
| January 1 - June 30 | August 29 |
| July 1 - December 31 | March 1 of the following year |

G13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emission Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
1.18	Rule Effectiveness
1.19	Administrative Hearings
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.06	Permit Requirements – Other Sources
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
3.01	Ambient Air Quality Standards
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.04	Particulate and Sulfur Dioxide Reduction Requirements
4.05	Hydrocarbon and Nitrogen Oxides Reduction Requirements
4.06	Carbon Monoxide Reduction Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)

Regulation	Title
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

G14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
2.17	Federally Enforceable District Origin Operating Permits
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards

G15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.

G16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.

G17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District
701 W. Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137***

Plantwide Requirements

Facility Description

River Metals Recycling is a scrap metal recycling facility.

Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	1 through 9

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.00	Definitions	1, 2
5.01	General Provisions	1 through 2
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	1 through 6
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6
STAR regulations are 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23		

Plantwide Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. TAC

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be *de minimis*. (See Comment 1.)
[Regulations 5.00 and 5.21]

b. VOC

The owner or operator shall not allow or cause total plantwide VOC emissions to equal or exceed 100 tons during any consecutive 12-month period.

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. TAC

The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to, SDS, analysis of emissions, and/or modeling results.

b. VOC

The owner or operator shall, monthly, calculate and record the monthly and 12-consecutive month plantwide total emissions for VOC for each month in the reporting period.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall semi-annually report the following information, as required by General Condition G12:

a. TAC

Any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration.

b. VOC

The owner or operator shall report the plantwide monthly and 12-consecutive month total emissions for VOC for each month in the reporting period.

Comment for Plantwide Requirements

- The facility submitted the TAC Environmental Acceptability (EA) Demonstration to the District on October 17, 2019. Compliance with the STAR EA Goals was demonstrated in the source's EA Demonstrations. Based on Tier 2 methods, the maximum highest single TAC off-site HQ for all process/process equipment is less than 1.0 and the maximum off-site R_c is less than 3.8 for the plantwide cumulative risk, the source has demonstrated compliance with the EA Goals for each TAC.

TAC	Maximum Concentration ($\mu\text{g}/\text{m}^3$)	BAC_c ($\mu\text{g}/\text{m}^3$)	BAC_{NC} ($\mu\text{g}/\text{m}^3$)	R_c	HQ
Cadmium (Cd)	0.0003	0.00056	0.020	0.5	0.015
Hexavalent Chromium (Cr(VI)) ¹	0.000035	0.000083	0.008	0.42	0.004
Benzene	0.1619	0.45	30	0.36	0.005
Ethylbenzene	0.1625	0.40	1000	0.41	2.00E-04
Cumene	0.0169	0.10	400	0.17	4.23E-05
Naphthalene	0.0135	0.029	3	0.47	0.005
Total				2.39	--

¹ The company assumed all chromium was hexavalent chromium.

Emission Unit U1: Scrap Metal Processing

Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
1.14	Control of Fugitive Particulate Emissions	1, 2, and 8
7.08	Standards of Performance for New Process Operations	1 through 4
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 4

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E1	Scrap Metal Shredder – Hammer Mill	2005	7.08, 7.25	C1	S1
E2	Scrap Metal Shredder – Conveyors	2005	7.08, 7.25	C1	S1
E3	Scrap Metal Shredder – Magnetic Separation	2005	7.08, 7.25	C1	S1
E4	Aluminum Shredder – Hammer Mill (IA)	After 1976	7.08	C2	NA
E5	Aluminum Shredder – Conveyors (IA)	After 1976	7.08	C2	NA
E6	Aluminum Shredder – Magnetic Separation (IA)	After 1976	7.08	C2	NA
E7	Mobile Torch Cutters, maximum of 18 can be operational throughout the yard for at any one-time (IA)	After 1976	1.14	NA	NA
E8a	Ferrous Baler (IA)	After 1976	1.14	NA	NA
E8b	Ferrous Baler Conveyor (IA)	After 1976	1.14	NA	NA
E9a	Non-Ferrous Baler (IA)	After 1976	1.14	NA	NA
E9b	Non-Ferrous Baler Conveyor (IA)	After 1976	1.14	NA	NA
E10a	Shear (IA)	After 1976	1.14	NA	NA
E10b	Shear Conveyor (IA)	After 1976	1.14	NA	NA

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E12	Loading/Loadout (IA)	After 1976	1.14	NA	NA
E13	E-Crane (IA)	After 1976	1.14	NA	NA
E14	Storage Piles (IA)	NA	1.14	NA	NA
E15	Paved Roads (IA)	NA	1.14	NA	NA

Control Devices

Control ID	Description	Control Efficiency
C1	Water Spray	67.5%
C2	One (1) pulse-jet baghouse, make ETA 2000	98%

U1 Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. Opacity

- i. For Emission Points E1, E2, E3, E4, E5, and E6, the owner or operator shall not allow visible emissions to equal or exceed 20% opacity. [Regulation 7.08, section 3.1.1]
- ii. For Emission Points E7, E8a, E8b, E9a, E9b, E10a, E10b, E12, E13, E14 and E15, no person shall cause or permit the discharge of fugitive emissions in excess of 20% opacity. [Regulation 1.14, section 2.3]
- iii. For Emission Points E7, E8a, E8b, E9a, E9b, E10a, E10b, E12, E13, E14 and E15, no person shall cause or permit the discharge of visible fugitive emissions beyond the lot line of the property on which the emissions originate. [Regulation 1.14, section 2.4]

b. PM/PM₁₀

- i. For Emission Points E1, E2, and E3, the owner or operator shall not allow PM emissions to exceed 40.64 lb/hr per piece of equipment based on actual operating hours in a calendar day.² [Regulation 7.08, section 3.1.2]
- ii. For Emission Points E4, E5, and E6, the owner or operator shall not allow PM emissions to exceed 6.72 lb/hr per piece of equipment based on actual operating hours in a calendar day.² [Regulation 7.08, section 3.1.2]
- iii. For Emission Points E7, E8a, E8b, E9a, E9b, E10a, E10b, E12, E13, E14 and E15:
 - (1) No person shall cause, allow, or permit any materials to be handled, transported, or stored; or a building and/or its appurtenances to be constructed, altered, used, repaired, or demolished; or a road to be used without taking reasonable precautions to prevent particulate matter from becoming airborne beyond the work site. [Regulation 1.14, section 2.1]

c. TAC

See Plantwide TAC Standards.

² For Emission Points E1, E2, E3, E4, E5, and E6, , a one-time PM compliance demonstration for this equipment was performed and the lb/hr standard cannot be exceeded uncontrolled.

d. VOC

- i. See Plantwide VOC Standards.
- ii. For Emission Points E1, E2, and E3, the owner or operator shall not allow or cause the VOC emissions, including, but not limited to, solvents, thinners and cleaners, to equal or exceed 60.75 tons in any period of twelve consecutive months.³ [Regulation 7.25, sections 2.1 and 3.1]
- iii. For Emission Points E1, E2, and E3, the owner or operator shall limit the scrap metal throughput to 500,000 tons per 12-consecutive month period.³
- iv. For Emission Points E1, E2, and E3, the owner or operator shall drain and remove, to the extent practicable, VOC containing fluids from vehicles appliances, industrial machinery, and other metal scrap received prior to shredding, or shall document that inspections have been performed to confirm the non-existence of VOC containing fluids.⁴

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. Opacity

- i. For Emission Points E1, E2, E3, E4, E5, and E6:
 - (1) The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
 - (2) At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
 - (3) The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the

³ A BACT analysis was submitted on 10/17/2019 and the facility is taking an 500,000 tons per 12-consecutive month period scrap metal throughput operational limit.

⁴ Fluids shall include, but are not limited to, gasoline, motor oil, transmission oil, and hydraulic fluid.

survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

- ii. For Emission Points E7, E8a, E8b, E9a, E9b, E10a, E10b, E12, E13, E14, and E15:
 - (1) The owner or operator shall perform daily observations for the presence of dust clouds from any cause, including winds and vehicle traffic and record any findings. If dust is visible, the owner or operator shall take appropriate measures, such as water spray or chemical suppressants, to eliminate the dust to the extent that this is possible without creating safety hazards.

b. PM/PM₁₀

- i. The owner or operator shall monthly perform a visual inspection of the structural and mechanical integrity of Baghouse C2 for signs of damage, air leakage, corrosion, or other equipment defects, and repair and/or replace defective components as needed. The owner or operator shall maintain monthly records of the results.
- ii. For Emission Point E12, reasonable precautions shall be taken to reduce particulate emissions including minimizing drop height when loading with the material handler (grapple crane), sweeping/watering as necessary, etc.

c. TAC

See Plantwide TAC Monitoring and Record Keeping.

d. VOC

- i. See Plantwide VOC Monitoring and Record Keeping.
- ii. For Emission Points E1, E2, and E3, the owner or operator shall monthly calculate and record the consecutive 12-month total emissions and scrap processing rate.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall semi-annually report the following information, as required by General Condition G12:

a. Opacity

- i. The date, time, and results for each visible emission survey during which visible emissions were detected, or a negative declaration if no visible emission were observed;
- ii. The date, time, and results of each Method 9 or Method 22 observation conducted, or a negative declaration if no or observations were required;
- iii. Description of any corrective action taken.

b. PM/PM₁₀

The owner or operator shall report any events that caused particulate matter to become visible beyond the work site.

c. TAC

See Plantwide TAC Reporting.

d. VOC

- i. See Plantwide VOC Reporting.
- ii. For Emission Points E1, E2, and E3, the consecutive 12-month total emissions and scrap processing rate.

Emission Unit U2: Parts Washer (IA)**Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	1, 2, 3, 4.1, 4.2

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
IA7	One (1) Parts Washer using a VOC solvent, model MDL 30	2001	6.18	NA	NA

U2 Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. VOC

- i. The owner or operator shall install, maintain, and operate the control equipment as follows: [Regulation 6.18, section 4]
 - (1) The cold cleaner shall be equipped with a tightly fitting cover that is free of cracks, holes, or other defects. If the solvent is agitated or heated, then the cover shall be designed so that it can be easily operated with 1 hand. [Regulation 6.18, section 4.1.1]
 - (2) The cold cleaner shall be equipped with a drainage facility that is designed so that the solvent that drains off parts removed from the cleaner will return to the cold cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system. [Regulation 6.18, section 4.1.2]
 - (3) A permanent, conspicuous label summarizing the operating requirements specified in Regulation 6.18, section 4.2 shall be installed on or near the cold cleaner. [Regulation 6.18, section 4.1.3]
 - (4) If used, the solvent spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaner. Solvent flow shall be directed downward to avoid turbulence at the air-solvent interface and to prevent solvent from splashing outside of the cold cleaner. [Regulation 6.18, section 4.1.4]
 - (5) Work area fans shall be located and positioned so that they do not blow across the opening of the cold cleaner. [Regulation 6.18, section 4.1.6]
 - (6) The solvent-containing portion of the cold cleaner shall be free of all liquid leaks. Auxiliary cold cleaner equipment such as pumps, water separators, steam traps, or distillation units shall not have any visible liquid leaks, visible tears, or cracks. [Regulation 6.18, section 4.1.8]
- ii. The owner or operator shall observe at all times the following operating requirements: [Regulation 6.18, section 4.2]
 - (1) Waste solvent shall neither be disposed of nor transferred to another party in a manner such that more than 20% by weight of the waste solvent can evaporate. Waste solvent shall be stored only

in a covered container. A covered container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. [Regulation 6.18, section 4.2.1]

- (2) The solvent level in the cold cleaner shall not exceed the fill line. [Regulation 6.18, section 4.2.2]
- (3) The cold cleaner cover shall be closed whenever a part is not being handled in the cold cleaner. [Regulation 6.18, section 4.2.3]
- (4) Parts to be cleaned shall be racked or placed into the cold cleaner in a manner that will minimize drag-out losses. [Regulation 6.18, section 4.2.4]
- (5) Cleaned parts shall be drained for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. [Regulation 6.18, section 4.2.5]
- (6) A spill during solvent transfer shall be cleaned immediately, and the wipe rags or other sorbent material shall be immediately stored in a covered container for disposal or recycling, unless enclosed storage of these items is not allowed by fire protection authorities. [Regulation 6.18, section 4.2.6]
- (7) Sponges, fabric, wood, leather, paper products, and other absorbent material shall not be cleaned in a cold cleaner. [Regulation 6.18, section 4.2.7]

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. VOC

- i. The owner or operator shall maintain records that include the following for each purchase: [Regulation 6.18, section 4.4.2]
 - (1) The name and address of the solvent supplier,
 - (2) The date of the purchase,
 - (3) The type of the solvent, and
 - (4) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).
- ii. All records required in Regulation 6.18, section 4.42 shall be retained for 5 years and made available to the District upon request. [Regulation 6.18, section 4.4.3]

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall semi-annually report in accordance with General Condition G9.

a. VOC

There are no compliance reporting requirements for this equipment.

Insignificant Activities

Equipment	Qty.	PTE (ton/yr)	Regulation Basis
Containers, reservoirs, or tanks used exclusively for storage of lubricating oils or fuel oils with a vapor pressure of less than 10 mmHg at conditions of 20°C and 760 mmHg. 1 Hydraulic Oil – 1000 gallons 1 Used Oil – 2500 gallons 1 Hydraulic Oil – 10,000 gallons 1 Transformer Oil – 316 gallons 6 Engine Oil, Antifreeze, Gear Oil – 55 gallons 1 Motor Oil – 250 gallons 1 Used Oil – 250 gallons 1 Hydraulic Oil – 500 gallons 1 No. 2 Diesel – 2500 gallons 2 Hydraulic Oil – 75 gallons 1 Hydraulic Oil – 300 gallons 3 Hydraulic Oil – 55 gallons 1 Transformer Oil – 316 gallons 1 Hydraulic Oil – 1000 gallons 1 Used Oil – 1000 gallons 20 Motor Oil, Hydraulic Oil, Transmission Oil, Antifreeze – 55 gallons 1 No. 2 Diesel – 2000 gallons Hydraulic Oil – 3575 gallons 1 Transformer Oil – 316 1 Hydraulic Oil – 1000 gallons 1 Hydraulic Oil – 100 gallons 6 Gear Oil, Used Oil, Kerosene, and City Water – 55 gallons 1 Gear Oil – 100 gallons 3 Transformer Oil – 187 gallons 1 Transformer Oil – 316 gallons 1 Transformer Oil – 1246 gallons 1 Transformer Oil – 316 gallons 1 Transformer Oil – 513 gallons 1 Diesel – 500 1 Motor Oil – 275 1 Hydraulic Oil – 275	64	VOC < 1 ⁵	Regulation 1.02, Appendix A, section 3.9.2

⁵ These tanks store gasoline, motor oil, hydraulic oil, fuel oil, No. 2 diesel, used oil, etc. Each tank has a relatively small capacity, a projected low annual turnover rate, and negligible VOC content of material stored. To conservatively over-estimate, River Metals Recycling assumes PTE to be no more than 1 tpy.

Equipment	Qty.	PTE (ton/yr)	Regulation Basis
Storage vessels for VOCs with a maximum capacity of 250 gallons or less. Glycol	1	VOC < 1 ⁵	Regulation 1.02, Appendix A, section 3.24
Diesel or fuel oil storage tanks that are not used for distribution, sale or resale, and that have less than two times the capacity of the vessel in annual turnover of the fluid contained.	2	VOC < 1 ⁵	Regulation 1.02, Appendix A, section 3.25

1. Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
2. Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
3. The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.
4. Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
5. The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.
6. The District has determined that no monitoring, recordkeeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.

Attachment A - Default Emission Factors, Calculation Methodologies, & Stack Tests

Generally, emissions are calculated by multiplying the throughput (ton, MMCF, gallons, etc.) or hours of operation of the equipment by the appropriate emission factor and accounting for any control devices unless otherwise approved in writing by the District.

Table 1-U1 Scrap Metal Processing

EP	Description	Emission Factor/Calculation Methodology
E1	Shredder-Hammer Mill	Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-10.F for 80% Auto & 20% Scrap throughput mixture. Assume all PM = PM ₁₀ = PM _{2.5} = 0.0403 lbs/ton
E3	Shredder-Magnetic Separation	
E4	Aluminum Shredder – Hammer Mill	
E6	Aluminum Shredder – Magnetic Separation	VOC EF from stack testing at General Iron, Chicago IL, tested on 5/25/2018: VOC = 0.24300 lbs/ton
E2	Shredder-Conveyors	Emission factors for crushed stone conveyor transfer points and screening from AP-42, Chapter 11.19, Table 11.19.2-2 (lbs/ton): PM = 1.4 x 10 ⁻⁴ , PM ₁₀ = 4.6 x 10 ⁻⁵ , PM _{2.5} = 1.3 x 10 ⁻⁵
E5	Aluminum Shredder – Conveyors	
E7	Torch Cutters	Versar, Inc., Title V Applicability Workbook, Prepared for The Institute of Scrap Recycling Industries, Inc., dated 1996 Assume all PM = PM ₁₀ = PM _{2.5} = 0.06 lbs/hr
E8a	Ferrous Baler	Emission factors (uncontrolled) for tertiary crushing from AP-42, Chapter 11.19, Table 11.19.2-2 (lbs/ton): PM = 0.0054, PM ₁₀ = 0.0024, and PM _{2.5} = 0.0024
E9a	Non-Ferrous Baler	
E10a	Shear	
E10b	Shear Conveyor	
E8b	Ferrous Baler Conveyor	Emission factors (uncontrolled) for tertiary crushing from AP-42, Chapter 11.19, Table 11.19.2-2 (lbs/ton): PM = 0.0030, PM ₁₀ = 0.0011, and PM _{2.5} = 0.0011
E9b	Non-Ferrous Baler Conveyor	
E13	E-Crane	
E12	Loading/Loadout	Emission factors (uncontrolled) for truck loading from AP-42, Chapter 11.19, Table 11.19.2-2: PM = PM ₁₀ = PM _{2.5} = 0.0011 lbs/ton
E14	Storage Piles	Emission factors from AP-42, Chapter 13.2.4 (lbs/ton): PM = 0.00249, PM ₁₀ = 0.00118, and PM _{2.5} = 0.00118
E15	Paved Roads	Emission Factor from AP-42 13.2.1 (lbs/mile): PM = 2.257, PM ₁₀ = 0.451, and PM _{2.5} = 0.111. (Rainfall can be considered using Equation 2)

Table 2-U2 Parts Washer

EP	Description	Emission Factor/Calculation Methodology
IA7	Parts Washer	Mass Balance