

217/782-2113

LIFETIME OPERATING PERMIT

PERMITTEE

Azcon Corporation  
Attn: Matt Underwood  
121 Chessen Lane  
Alton, Illinois 62002

Application No.: 11100004

I.D. No.: 119010AEL

Applicant's Designation: SCRAPSHRED

Date Received: October 4, 2011

Operation of: Metal Scrap Shredder

Date Issued: December 12, 2011

Expiration Date: See Condition 1.

Location: 121 Chessen Lane, Alton, Madison County

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a hammermill shredder controlled by water mist applicator, magnetic separator, air separator (Z-box) controlled by closed loop capture device with built-in cyclone and twenty-five product and by-product conveyors pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. This Permit shall expire 180 days after the Illinois EPA sends a written request for the renewal of this Permit, unless the Permit is withdrawn or is superseded by a revised Permit.
- 2a. The Permittee shall comply with the opacity limitations of 35 Ill. Adm. Code 212.123 and the particulate matter emission limitations of 35 Ill. Adm. Code 212.321.
- b. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source (35 Ill. Adm. Code 212.301).
- c. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- d. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
  - i. The name and address of the source;
  - ii. The name and address of the source;

- iii. The name and address of the owner or operator responsible for execution of the operating program;
  - iv. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
  - v. Location of unloading and transporting operations with pollution control equipment;
  - vi. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
  - vii. Estimated frequency of application of dust suppressants by location of materials; and
  - viii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- e. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with this Subpart and shall be submitted to the Agency for its review.
- 3a. The control systems on hammermill and air separator shall be in operation at all times when emission units are in operation. The capture device on air separator shall be continuously maintained under negative air pressure.
  - b. The Permittee shall install continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the shredder system is in use to monitor water usage of mist applicator on hammermill and differential air pressure on all openings on air separator capture system.
  - c. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the equipment covered under this permit such that the equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
- 4. Operations and particulate matter (PM) emission of the hammermill shall not exceed the following limits:

| Process Rate |           | Emission Factors |                  | E M I S S I O N S |           |                  |           |
|--------------|-----------|------------------|------------------|-------------------|-----------|------------------|-----------|
|              |           | (Lbs/Ton)        |                  | PM                |           | PM <sub>10</sub> |           |
| (Tons/Mo)    | (Tons/Yr) | PM               | PM <sub>10</sub> | (Tons/Mo)         | (Tons/Yr) | (Tons/Mo)        | (Tons/Yr) |
| 58,300       | 700,000   | 0.070            | 0.034            | 2.0               | 24.5      | 1.0              | 11.9      |

These limits are based upon maximum material throughput of 80 tons/hour and emission factors derived from the testing of similar equipment. Compliance with annual limits shall be determined from a running total of 12 months of data.

5. This permit is issued based on negligible emissions of particulate matter (PM) from the magnetic separator, air separator and twenty-five conveyors. For this purpose, emissions from each emission source shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
6. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
7. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
8. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
  - a. Records addressing use of good operating practices for the equipment covered under this permit:
    - i. Records for periodic inspection of the equipment covered under this permit with date, individual performing the inspection, and nature of inspection;
    - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair; and
    - iii. Control device monitoring data, i.e. water usage in mist applicator and differential air pressure of air separator capture device.
  - b. Material throughput (tons/month and tons/year) in the hammermill and materials separation system;
  - c. Water usage (gallons/month and gallons/year) in mist applicator; and
  - d. Monthly and annual emissions of PM, with supporting calculations (tons/month and tons/year).

9. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
10. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
11. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Illinois EPA  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Illinois EPA  
Division of Air Pollution Control  
2009 Mall Street  
Collinsville, Illinois 62234

12. Persons with lifetime operating permits must obtain a revised permit for any of the following changes at the source:
  - a. An increase in emissions above the amount the emission unit or the source is permitted to emit;
  - b. A modification;
  - c. A change in operations that will result in the source's noncompliance with conditions in the existing permit; or
  - d. A change in ownership, company name, or address, so that the application or existing permit is not longer accurate.

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If you have any questions on this permit, please call Valeriy Brodsky at 217/785-1705.

Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

Date Signed: \_\_\_\_\_

ECB:VJB:psj

cc: Region 3