

Moyata Anotta <anottam@gmail.com>

### **NW Metals ACDP Application**

28 messages

Wed, Dec 4, 2019 at 3:09 PM GRAIVER David < David. Graiver@state.or.us> To: Moyata Anotta <anottam@gmail.com>, "nwmetalsinc@gmail.com" <nwmetalsinc@gmail.com> Cc: BROWN Courtney . BROWN@state.or.us>, HOFFMAN Matt . Hoffman@state.or.us>, DECONCINI Nina <Nina.DECONCINI@state.or.us>, DIETRICH Steve <Steve.Dietrich@state.or.us>

Mr. Anotta

DEQ received a General ACDP application from NW Metals along with payment of \$1,440. The facility is required to operate under a Simple ACDP. The application forms for a Simple ACDP can be found at https://www.oregon.gov/deg/ag/agPermits/Pages/ACDP-Simple.aspx.

You will need to fill out the following forms: AQ101, AQ102, AQ210, AQ230, AQ402, AQ403, and AQ404. Some explanation is provided below and full instructions are available in the "Application Guidelines Document" in the link I provided above.



AQ101 – This is a basic administrative information sheet and needs to be completely filled out.



AQ102 – Provide a description of your process



AQ210 - Provide information on the engine that powers the shredder



AQ230 - Provide information on the shredder

AQ402 - You can submit the attached PTE excel sheet in lieu of this form. If any of the yellow highlighted cells are incorrect, put in the correct values and provide documentation to support the updated values.

AQ403 – You can submit the attached PTE excel sheet in lieu of this form. If any of the yellow highlighted cells are incorrect, put in the correct values and provide documentation to support the updated values.

AQ404 - Fill this out

Attached is the fee table showing fees due with a new Simple permit application and subtracting the previously submitted payment of \$1,440. The amount still due is \$11,980 to be submitted with the Simple ACDP application.

A completed application must be submitted to DEQ by December 13, 2019.

David Graiver, P.E.\*

Graiver.David@deg.state.or.us

Oregon Department of Environmental Quality



### **Air Quality Division**

### **Administrative Information**

This form is for Simple, Standard, or Construction Air Contaminant Discharge Permit (ACDP) applications for new permits, renewals and modifications. The applicant must submit **TWO** copies of this and all other required permit forms. If fees are required, submit the application along with the fees to:

Oregon Department of Environmental Quality Financial Services - Revenue Section 700 NE Multnomah Street, Suite 600 Portland, Oregon 97232 - 4100

If fees are not required, submit the application to the appropriate Regional Office where the facility is located.

- Company: Enter the legal name of the company as registered with the <u>State of Oregon Corporations Division</u> and mailing address. Also, enter the number of employees for the corporation.
- 2. **Facility Location**: Enter the common name of the facility and address if different from the information provided in question one. If the common name is the same, enter "same".
  - Provide the location (i.e., the street address) for the facility. If the facility is not located on a street, provide other directional
    information such as nearby cross streets (i.e., northwest of Third Avenue at Howard Street). If the facility is located in an
    industrial park, provide the name and address of the park.
  - Provide the city name, county, and zip code. If the facility is located in an unincorporated area of a county, enter "unincorporated" and identify the nearest incorporated municipality.
  - Provide the number of employees that work at the facility location.
- 3. Site Contact Person: Provide the following information of the individual to contact regarding this permit application.
  - Enter the name of the individual
  - Enter the title of the individual.
  - Enter the area code and telephone number of the individual.
  - Enter the area code and facsimile (FAX) number, if available.
  - Enter the Email address, if available.

### 4. Industrial Classification Code:

- Enter the appropriate Standard Industrial Classification (SIC) code and North American Industry Classification System
  (NAICS) code for the facility. There could be more than one primary SIC or NAICS. A secondary SIC or NAICS would be
  for other supporting activities at the facility, such as a steam process boiler.
- If this facility is owned and/or operated by a governmental entity, specify the type of entity (e.g., city, county, state, federal, tribal) and the relationship of that entity to the facility (e.g., "owner," "operator," "owner and operator").
- 5. Other DEQ permits: Identify any DEQ solid waste, stormwater, water, and hazardous waste permits issued to the facility (e.g., National Pollution Discharge Elimination System [NPDES] Waste Discharge Permit 100797, etc.).
- 6. **Permit Action:** Put an X for the appropriate permit action for this application. If this is a renewal of an existing permit and there are no changes to the permit (i.e., changes to equipment or production rates), then the applicant just needs to submit form AQ101. If there are changes to the permit, then the applicant will need to submit any applicable forms to describe the changes. Applications for renewal of a Standard ACDP must include <u>form AQ403</u>. Please refer to the <u>instructions for AQ403</u>.
- 7. Signature: The ACDP application must be signed. The application should be signed by the official responsible for the facility's compliance with air quality regulations and knowledgeable of the contents of this application. The official might be the owner, the plant manager, the head of environmental affairs, etc.



		DEQ U	SE ONLY			
Permit Number:			Type of Applicatio	n:		
Application No:			RNW	MOD NI	EW	
Date Received:						
Regional Office;			Check No.	Amount \$	•	
			_			
1. Company			2. Facility Location			
Legal Name: NW METALS INC			Name: NW METALS INC			
Mailing Address: 7600 NE KILLINGSWORTH ST			Street Address: 7600 NE KILLINGSWORTH ST			
City: PORTLAND	State: OR	Zip Code: 97218	City: PORTLAND	County: Multnomah	Zip Code: 97218	
Number of employe	es (Corporate):		Number of employ	ees (Facility):		
3. Industrial Cla	ssification Code	s)	4. Other DEQ F	Permits		
Primary SIC and NAICS: 5015						
Secondary SIC and NAICS: 509	3					
5. Permit Action	n:					
Renewal of an e	DP on ACDP .CDP .CDP (PSD/NSR) xisting permit without		rm AQ403 for Standa			
Renewal of an exampleModification of		anges (include any o	ther necessary forms a	and form AQ403 for Sta	ndard ACDPs)	
6. Signature I hereby apply for pe	ermission to discharge	air contaminants in	the State of Oregon, a	s stated or described in	this application, and	
certify that the infor the best of my know		is application and th	e schedules and exhib	its appended hereto, are	true and correct to	
MOY	'ATA ANOTTA		SECRETARY 503-367-6955			
Name of official (Pr	inted or Typed)		Title of official and	d phone number		
Mo				02/11/2020		
Signature of official			Date			



### Fee Information

(Make check payable to DEQ)

Note: The initial application fees and annual fees specified below (OAR 340-216-8020, Table 2, Parts 1, 2 and 3) are only required for initial permit applications. These fees are not required for an application to renew or modify an existing permit. The appropriate specific activity fee(s) specified below (OAR 340-216-8020, Table 2, and Part 4) applies to permit modifications or may be in addition to initial permit application fees.

OAR 340-216-8020, Table 2, Part 1 – Initial Permitting Applicat	ion Fees:	
Short Term Activity ACDP		\$3,600.00
Simple ACDP	$\checkmark$	\$7,200.00
Construction ACDP		\$11,520.00
Standard ACDP (PSD/NSR)		\$14,400.00
Standard ACDP (Major NSR or Type A State NSR)		\$50,400.00
OAR 340-216-8020, Table 2, Part 2 – Annual Fees:		
Simple ACDP – Low fee class		\$2,304.00
Simple ACDP – High fee class	$\checkmark$	\$4,608.00
Standard ACDP		\$9,216.00
OAR 340-216-8020, Table 2, Part 3 - Cleaner Air Oregon Annu	al Fees:	
Simple ACDP - Low fee class		\$806.00
Simple ACDP - High fee class	. 🗸	\$1,612.00
Standard ACDP		\$3,225.00
OAR 340-216-8020, Table 2, Part 4 – Specific Activity Fees:		
Non-Technical Permit Modification		\$432.00
Basic Technical Permit Modification		\$432.00
Simple Technical Permit Modification	Particular and State of State	\$1,440.00
Moderate Technical Permit Modification		\$7,200.00
Complex Technical Permit Modification		\$14,440.00
Major NSR or type A State NSR Permit Modification		\$50,400.00
Modeling review (outside Major NSR or type A State NSR)		\$7,200.00
Public Hearing at Source's Request		\$2,880.00
State MACT determination		\$7,200.00
Compliance Order Monitoring		\$144.00/month

Oregon Department of Environmental Quality Air Contaminant Discharge Permit Application

**Total Fees:** 

- 1,440.00 11,980.00due

\$ 13,420.00

Revised 6/26/19



1.Company	Information:
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Legal Name: NW METALS INC	Other company name (if d	ifferent than legal name):
2. Site Contact Person: (A person who deals with DEQ staff about	ut equipment problems.)	
Name: MOYATA ANOTTA	Telephone number: 503-367-6955	Fax: 971-229-0369
Title: SECRETARY	Email address: ANOTTAM@GMAIL.	COM
Mailing address: 7600 NE KILLINGSWORTH ST	City, State, Zip Code PORTLAND OR 972	18
B. Facility Contact Person:  (If other than the site contact person, a partner than be housed at a different site.)	person involved with all environmental iss	sues at the facility although
Name:	Telephone number:	Fax:
Title:	Email address:	
Mailing address:	City, State, Zip Code	
l. Mailing Contact Person: (If other than the site contact person, a բ directed.)	person to whom the company would like a	all agency communications
Name:	Telephone number:	Fax:
Name.		
Title:	Email address:	
	Email address:  City, State, Zip Code	
Title:  Mailing address:  5. Invoice Contact Person:		ations related to resolving

Email address:

City, State, Zip Code

Title:

Mailing address:





#### Instructions

- 1. Provide a text description of the facility processes. In describing the facility and in preparing the permit application, the applicant should always remember that the permit should be written to cover the facility as it will operate for the future permit term. A permit term is five or ten years depending on the type of permit issued. Providing information on future operations now may prevent the need for the additional cost of permit modifications in the future. The applicant should provide the information requested below.
  - A description of the current processes that emit air pollutants;
  - The fuels used and products produced in these processes;
  - If this application is for a permit modification, a discussion of the proposed modification;
  - If this application is for a renewed ACDP, a description of any anticipated modifications to the facility's existing processes during the pending permit term that the ACDP will need to address;
  - If this application is for an initial or renewed ACDP, a description of any anticipated construction at the facility during the pending permit term that the ACDP will need to address.
- Attach a plot plan showing the location of all stacks and vents though which regulated pollutants are released to the atmosphere.
- 3. Attach a process flow diagram which shows the air pollutant emitting processes at the facility. The applicant should ask the DEQ permit writer about the level of detail that is required. The diagram should illustrate the following:
  - All regulated air pollutant-emitting devices and processes at the facility, labeled with the same identification numbers that the applicant assigned them in Form Series AQ200.
  - Flow routes of contaminated air from processes to emission control equipment and emission points.
  - All air pollution control devices at the facility, labeled with the same identification numbers that the applicant assigned them in Form Series AQ300.
  - The location of all stacks and vents through which regulated pollutants are released to the atmosphere.
  - Any materials handling activities that emit regulated pollutants (e.g., loading crushed rock, storage piles, etc.) not addressed in a Device/Process Form (series AQ200).
  - Any fuel storage and piping systems on the facility property.
- 4. Attach a city map or drawing showing the facility location, property lines and its relation to nearby (i.e., within 1 mile) sensitive receptors such as residential areas, hospitals, schools, etc. If the facility is located in a rural area, the applicant should note distances on approaching roads and also mark the location of landmarks.

NW Netale Shop Building Portland Food Cillings worth St Sandely Perf.

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Facility Name: NW METALS INC

Permit Number:

1.	Description	of facility	and	processes:

NW METALS INC IS AN AUTO DISMANTLER. VEHICLES ARE BOUGHT FROM AUCTIONS AS WELL AS INDIVIDUAL SELLERS WHICH ARE BROUGHT IN BY TOW TRUCKS. UPON VEHICLES ARRIVAL AT FACILITY ALL OILS ARE DRAINED, FREON RECOVERED, BATTERIES REMOVED, WHEELS AND TIRES REMOVED. ONCE THE PROCESS OF REMOVAL OF OILS AND OTHER ITEMS IS COMPLETED THE VEHICLES ARE TRANSFERED TO THE CRASHING SITE WHERE THEY ARE CRASHED AND FEED INTO THE ARJES SHREDDER TO BE SHREDDED. FINAL PRODUCTS OF THE SHREDDING PROCESS ARE IRON/STEEL, ALUMINUM/ZORBA AND FLUFF.

- 2. Attach plot plan.
- 3. Attach process flow diagram.
- 4. Attach a city map or drawing showing the facility location.

## State of Oregon Department of Environmental Quality Internal Combustion Engines and Turbines

Form AQ210 Instructions

- 1. Assign an identification number to this device. Use this ID number to reference this device elsewhere in the application materials (e.g., on the process flow diagram, on the emissions data forms, etc.). The ID number may be anything the owner/operator wishes.
- 2. Indicate whether this engine is *existing* (i.e., currently in place) or *future* (i.e., the engine is to be added in the future during the permit term).
- 3. Enter the date that construction/installation of this device *commenced*. This refers to the date on which a financial commitment was made to undertake the construction.
- 4. Enter the date on which this device was or will be fully installed or construction completed.
- 5. Enter the name of the manufacturer of the device.
- 6. Enter the date the engine was manufactured.
- Enter the manufacturer's rated design capacity in horse power or Btu per hour for turbines.
- Indicate (yes or no) whether there is an add-on control device. If yes, then complete the appropriate series AQ300 form and include the control device identification number on this form.
- 9. Describe the device. Identify its use/purpose (e.g., manufacturing, pumping, power generation, etc.).
- 10. Indicate the projected maximum number of hours per day that the engine will operate.
- 11. Indicate the projected maximum number of hours per year that the engine will operate.
- 12. Provide the following information for each fuel used in the device.
  - Identify the type and grade of fuel.
  - b. Enter the maximum hourly fuel usage. This number should represent the design capacity of the device. Specify the appropriate unit of measure (e.g., gallons per hour, cubic feet per hour, etc.).
  - c. Enter the projected maximum annual fuel usage expected to be achieved in any one year of the pending permit term; specify the appropriate annual unit of measure (e.g., gallons per years; thousand cubic feet per year).
- 13. Provide the height of the stack associated with this device in feet.
- 14. Provide the exit diameter of the stack associated with this device in feet.
- 15. Provide the flow rate of the stack in dry standard cubic feet per minute (dscf/min).
- Answer each of the following questions about monitoring equipment on the device.
  - a. Indicate (yes or no) whether the device has a fuel flow monitor. If yes, specify whether the monitor has a continuous recorder.
  - Indicate (yes or no) whether the device has an engine load monitor. If yes, specify whether the monitor has a continuous recorder.
  - c. Indicate (yes or no) whether the device has any other emission parameter monitor. If yes, specify the type of monitor and indicate whether it has a continuous recorder.



# State of Oregon Department of Environmental Quality Internal Combustion Engines and Turbines

Form AQ210 Instructions

Facili	ty Name:		NW MET	TALS INC		P	ermi	it Number:
Engin	e Information							
1.	Device ID N	umber				7600		
2.	Existing or f	uture?				Existing		•
3.	Date constru	ction/in	stallation commence	ed	-	5/2017		
4.	Date constru	iction/in	stallation completed	d		11/2019		
5.	Manufacture	er				ARJES		
6.	Date manufa	ctured				1/2019		
7.	Maximum ra	ating (M	Mbtu/hr for turbine	s, Hp for oth	ers)	rs) 700		
8.	Control devi	ce(s) (ye	es/no)			No		
	If yes, enter the identification number(s)							
9.	Description	of devic	e:					
Opera	Projected ma	aximum	hours/day					12
11.	Projected ma		NT.					
			nous year		M	3500		
	nformation .						Т	
12.	Fuel usage:	a.	Туре	b.		y usage	c.	Annual usage
	Primary		DIESEL		5	0L	-	180000L
	Back-up							
	Other							
Stack	Information							
13.	Exit height (	ft)						12FT
14.	Exit diamete	er (ft)			3FT			
15.	Design flow	rate (dsc	f/min)			6.67 DSCF/MIN		
Monit	toring Informa	tion						
16.	Monitoring 6	equipme	ent		No. of Hills and the			
	fuel flo	w (y/n)	No			recorder? (y/	n)	No
	engine loa	d (y/n)	No			recorder? (y/	n)	No
	other (s	pecify)				recorder? (y/	n)	



<u>Instructions</u> (Use this form for any process or device that is not covered by a specific process or device form in series AQ200.)

- 1. Assign an identification number to this process or device. Use this ID number to reference this process elsewhere in the application materials (e.g., on the process flow diagram, on the emissions data forms, etc.). The ID number may be anything the owner/operator wishes.
- 2. Provide a brief, descriptive name for the process.
- 3. Indicate whether this process is existing (i.e., currently in place) or future (i.e., the process is to be added in the future during the permit term).
- 4. Enter the date that construction/installation of this process *commenced* or will *commence*. This refers to the date on which a financial commitment was made to undertake the construction.
- Enter the date on which this process was fully installed or construction was completed, or on which date it
  is anticipated that construction will be completed.
- 6. Describe the process. Include a process flow diagram. If a process flow diagram is not available, sketch one on a sheet of blank paper and attach it to this form. Describe any pollutant-emitting materials handling activities associated with this process. Such activities would include: storage of raw materials or waste products in storage piles and the disturbance of those piles when materials are added to or removed from them; and the off-loading of raw material from or loading of product onto rail cars or trucks.
- 7. Indicate whether this process operates year-round or seasonally. If the operation is year-round, indicate whether the process experiences any seasonal variation (e.g., busiest during summer). If it is a seasonal operation, specify the months of operation.
- 8. Indicate whether this is a batch or continuous process?
- 9. Enter the maximum hours of operation per day.
- 10. Enter the maximum projected hours of operation per year.
- 11. Provide the following information for *each* raw material used in this process and/or the products made in the process. The owner/operator should NOT address fuel usage here. If this process burns fuel, then it should be addressed on another appropriate form to describe the fuel-burning activity.

For each type of raw material used, enter the maximum amount of the raw material used in the process at the rated short-term design capacity. Provide the units for the short-term capacity (e.g., pounds per hour, pounds per day, gallons per hour, etc.) If this is a batch operation, specify the amount of material used per batch and the number of batches per hour or day. Enter the maximum projected annual amount of raw material used in the process (e.g., tons per year or alternate unit of measure).

For each product produced, enter the maximum production rate at the rated short-term design capacity. Provide the units for the short-term capacity (e.g., widgets per hour, pounds per hour, pounds per day, gallons per hour, etc.) If this is a batch operation, specify the amount of product produced per batch and the number of batches per hour or day. Enter the maximum projected annual amount of product produced in the process. Specify the appropriate units of production.

12. Indicate (yes or no) whether any control device(s) is used with this process. If yes, provide the identification number(s) of the control device(s) as established on an appropriate AQ300 form.



Facility Name: NW METALS INC			Permit Numl	ber:		
Process Information						
1. ID Number		7600				
2. Descriptive name		AUTO SHREDDER				
3. Existing or future?		Existing				
4. Date commenced		5/2017				
5. Date installed/completed		11/2019				
6. Description of process:						
AUTO SHREDDING						
Operating Schedule						
7. Seasonal or year-round?		Year-round				
8. Batch or continuous operation?	Continuous					
9. Projected maximum hours/day	12					
10. Projected maximum hours/year		3600				
11. Process/device capacity:	Short ter	rm capacity Annual usage				
Raw materials	Amount	Units	Amount	Units		
VEHICLES/SCRAP METALS	10	TON/HR	36000	TON/YR		
Products						
SHREDDED MATERIAL	10	TON/HR	36000	TON/YR		
12. Control Indian (2) (1)				No		
12. Control devices(s) (yes/no)		had sha ang tirah ta	as AO200 f ( )	No		
If yes, provide the ID number and co	implete and attacl	ned the applicable seri	es AQ300 form(s	).		

Volvo Penta TAD1643VE

Tier IV

Engine Capacity: Engine Capacity:

Maximum Fuel Capacity Maximum Fuel Capacity

Diesel Fuel Heat Content

Heat Input Capacity

Sulfur Content of Fuel

700 hp 515 kW 50 L/hr 13.21 gal/hr 0.139 MMBtu/gal

1.84 MMBtu/hr

0.0015 %

2.00E-02 2.00E-02 2.00E-02	g/kW-hr g/kW-hr	Reference 1	0.02	0.10
2.00E-02	g/kW-hr	200		0.10
		Reference 1	0.02	0.10
	g/kW-hr	Reference 1	0.02	0.10
1.21E-05	lb/hp-hr	Reference 2	8.49E-03	0.04
0.40	g/kW-hr	Reference 1	0.45	1.99
3.50	g/kW-hr	Reference 1	3.97	17.41
0.19	g/kW-hr	Reference 1	0.22	0.94
2.52E-05	lb/MMBtu	Reference 3	4.63E-05	2.03E-04
7.88E-06	lb/MMBtu	Reference 3	1.45E-05	6.34E-05
7.76E-04	lb/MMBtu	Reference 3	1.42E-03	6.24E-03
7.89E-05	lb/MMBtu	Reference 3	1.45E-04	6.34E-04
1.30E-04	lb/MMBtu	Reference 4	2.39E-04	1.05E-03
8.20E-05	lb/MMBtu	Reference 4	1.51E-04	6.59E-04
2.81E-04	lb/MMBtu	Reference 3	5.16E-04	2.26E-03
1.93E-04	lb/MMBtu	Reference 3	3.54E-04	1.55E-03
			2.89E-03	1.27E-02
73.96	kg/MMBtu	Reference 5	299	1,311
3.00E-03	kg/MMBtu	Reference 6	1.21E-02	5.32E-02
6.00E-04	kg/MMBtu	Reference 6	2.43E-03	1.06E-02
			299	1,311
			300	1,316
	1.21E-05 0.40 3.50 0.19 2.52E-05 7.88E-06 7.76E-04 7.89E-05 1.30E-04 8.20E-05 2.81E-04 1.93E-04 73.96 3.00E-03 6.00E-04	1.21E-05 lb/hp-hr 0.40 g/kW-hr 3.50 g/kW-hr 0.19 g/kW-hr 0.19 g/kW-hr  2.52E-05 lb/MMBtu 7.88E-06 lb/MMBtu 7.76E-04 lb/MMBtu 7.89E-05 lb/MMBtu 1.30E-04 lb/MMBtu 8.20E-05 lb/MMBtu 2.81E-04 lb/MMBtu 1.93E-04 lb/MMBtu 1.93E-04 lb/MMBtu 1.93E-04 lb/MMBtu 6.00E-04 kg/MMBtu	1.21E-05         lb/hp-hr         Reference 2           0.40         g/kW-hr         Reference 1           3.50         g/kW-hr         Reference 1           0.19         g/kW-hr         Reference 1           2.52E-05         lb/MMBtu         Reference 3           7.88E-06         lb/MMBtu         Reference 3           7.76E-04         lb/MMBtu         Reference 3           7.89E-05         lb/MMBtu         Reference 4           8.20E-05         lb/MMBtu         Reference 4           2.81E-04         lb/MMBtu         Reference 3           1.93E-04         lb/MMBtu         Reference 3           73.96         kg/MMBtu         Reference 6           6.00E-04         kg/MMBtu         Reference 6	1.21E-05         lb/hp-hr         Reference 2         8.49E-03           0.40         g/kW-hr         Reference 1         0.45           3.50         g/kW-hr         Reference 1         3.97           0.19         g/kW-hr         Reference 1         0.22           2.52E-05         lb/MMBtu         Reference 3         4.63E-05           7.88E-06         lb/MMBtu         Reference 3         1.45E-05           7.76E-04         lb/MMBtu         Reference 3         1.45E-05           7.89E-05         lb/MMBtu         Reference 3         1.45E-04           1.30E-04         lb/MMBtu         Reference 4         2.39E-04           8.20E-05         lb/MMBtu         Reference 4         1.51E-04           2.81E-04         lb/MMBtu         Reference 3         5.16E-04           1.93E-04         lb/MMBtu         Reference 3         3.54E-04           2.89E-03           73.96         kg/MMBtu         Reference 6         1.21E-02           6.00E-04         kg/MMBtu         Reference 6         2.43E-03           299

<sup>[1]40</sup> CFR 98, Table A-1 (10/2009)

Reference 1: Tier 4 Emission Standards (40 CFR 1039.101)

Reference 2: AP-42 Table 3.4-1 (10/96)

Reference 3: AP-42 Table 3.4-3 (10/96)

Reference 4: AP-42 Table 3.4-4 (10/96)

Reference 5: 40 CFR 98, Table C-1 (11/2013)

Reference 6: 40 CFR 98, Table C-2 (11/2013)

Emissions at 8760 hours of operation per year

Pollutant  PM PM <sub>10</sub> PM <sub>2.5</sub> SO <sub>x</sub> NO <sub>x</sub> CO	Projected Emissions (tpy)					
	Engine	Crusher	Total			
PM	0.10	0.40	0.50			
PM <sub>10</sub>	0.10	0.40	0.50			
PM <sub>2.5</sub>	0.10	0.40	0.50			
SO <sub>x</sub>	0.04		3.72E-02			
NO <sub>x</sub>	1.99		1.99			
CO	17.41		17.41			
VOC	0.94	12.16	13.10			
HAP	1.27E-02	2.02E-03	1.47E-02			

PM (lb/ton) VOC (lb/ton) HAP (lb/ton)	HAP (lb/hr) Rate	PM (lb/hr) VOC (lb/hr)	
9 2			Greenfield MA - wTe Recycling Blend
10 10	60.704	1.22 5.82	/cling nd
3.16E-03 1.32E-01			Sims[1]
3.16E-03 3.93E-03 1.32E-01 1.39E-01 2.02E-01 5.74E-01	165	22.93	Sims[1] Omni[2] MN[3]
3.93E-03 2.02E-01	195.5	39.55	
5.74E-01			SSI[4]
5.22E-01			SSI[5]
9.06E-03 2.78E-01			Mean

Max Capacity	10 ton/hr	
TE based on stack tests	ack tests	
Ř	0.09 lb/hr	0.40 ton/yr
/oc	2.78 lb/hr	12.16 ton/yr
1AP[6]		
Cr	8.88E-06 lb/hr	3.89E-05 ton/yr
Pb	4.18E-04 lb/hr	1.83E-03 ton/yr
Mn	7.89E-06 lb/hr	3.45E-05 ton/yr
Z.	2.63E-05 lb/hr	1.15E-04 ton/yr
Total	4.61E-04 lb/hr	2.02E-03 ton/yr

<sup>&</sup>lt;sup>[1]</sup>SMM New England Corporation Johnston, RI April 26, 2018. VOC results as propane

<sup>&</sup>lt;sup>[2]</sup>Omnisource Jackson MI; April 2010. VOC results as propane

<sup>[3]</sup>MN NorMet2017. https://www.pca.state.mn.us/air/northern-metals-shredder-building-test-results

<sup>&</sup>lt;sup>[4]</sup>Schnitzer Steel Oakland, October 12, 2017, VOC results as methane

<sup>&</sup>lt;sup>[5]</sup>Schnitzer Steel Oakland, January 21, 2018, VOC results as methane

<sup>&</sup>lt;sup>[6]</sup>EPA Speciate Data Browser 5.0 for Car Shredder (Profile 1710930)



### ACDP PERMIT PROGRAM CATEGORICALLY INSIGNIFICANT ACTIVITIES

FORM AQ404 ANSWER SHEET

Facility name: NW METALS INC

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Indicate which of the following categorically insignificant activities are present at the facility by placing an "X" in the "Yes" or "No" column.

Yes	No	Type of activity Categorically Insignificant Activities
	1	Constituents of a chemical mixture present at less than 1 percent by weight of any chemical or compound regulated under divisions 200 through 268 excluding divisions 248 and 262 of this chapter, or less than 0.1 percent by weight of any carcinogen listed in the U.S. Department of Health and Human Service's Annual Report on Carcinogens when usage of the chemical mixture is less than 100,000 pounds/year
1		Evaporative and tail pipe emissions from on-site motor vehicle operation
	<b>\</b>	Distillate oil, kerosene, gasoline, natural gas or propane burning equipment, provided the aggregate expected actual emissions of the equipment identified as categorically insignificant do not exceed the de minimis level for any regulated pollutant, based on the expected maximum annual operation of the equipment. If a source's expected emissions from all such equipment exceed the de minimis levels, then the source may identify a subgroup of such equipment as categorically insignificant with the remainder not categorically insignificant. The following equipment may never be included as categorically insignificant:
		<ul> <li>A. Any individual distillate oil, kerosene or gasoline burning equipment with a rating greater than 0.4 million Btu/hour;</li> </ul>
		<ul> <li>B. Any individual natural gas or propane burning equipment with a rating greater than 2.0 million Btu/hour</li> </ul>
	1	Distillate oil, kerosene, gasoline, natural gas or propane burning equipment brought on site for six months or less for maintenance, construction or similar purposes, such as but not limited to generators, pumps, hot water pressure washers and space heaters, provided that any such equipment that performs the same function as the permanent equipment, must be operated within the source's existing PSEL
1		Office activities
	1	Food service activities
	1	Janitorial activities
	1	Personal care activities
	1	Grounds keeping activities, including, but not limited to building painting and road and parking lot maintenance
	1	On-site laundry activities
	1	On-site recreation facilities
	1	Instrument calibration
1		Maintenance and repair shop
/	1	Automotive repair shops or storage garages;  Air cooling or ventilating equipment not designed to remove air contaminants generated by or released from associated equipment
	1	Refrigeration systems with less than 50 pounds of charge of ozone depleting substances regulated under Title VI, including pressure tanks used in refrigeration systems but excluding any combustion equipment associated with such systems
	1	Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including associated vacuum producing devices but excluding research and development facilities



## ACDP PERMIT PROGRAM CATEGORICALLY INSIGNIFICANT ACTIVITIES

FORM AQ404 ANSWER SHEET

Yes	No	Type of activity
	1	Temporary construction activities
	1	Warehouse activities
	1	Accidental fires
	1	Air vents from air compressors
	1	Air purification systems
	1	Continuous emissions monitoring vent lines
	1	Demineralized water tanks
	1	Pre-treatment of municipal water, including use of deionized water purification systems
	1	Electrical charging stations
	1	Fire brigade training
	1	Instrument air dryers and distribution
	1	Process raw water filtration systems
	1	Pharmaceutical packaging
	1	Fire suppression
	1	Blueprint making
1		Routine maintenance, repair, and replacement such as anticipated activities most often associated with and performed during regularly scheduled equipment outages to maintain a plant and its equipment in good operating condition, including but not limited to steam cleaning, abrasive use, and woodworking
1		Electric motors
1		Storage tanks, reservoirs, transfer and lubricating equipment used for ASTM grade distillate or residual fuels, lubricants, and hydraulic fluids
	1	On-site storage tanks not subject to any New Source Performance Standard (NSPS), including underground storage tanks (UST), storing gasoline or diesel used exclusively for fueling of the facility's fleet of vehicles
	1	Natural gas, propane, and liquefied petroleum gas (LPG) storage tanks and transfer equipment
	1	Pressurized tanks containing gaseous compounds
	1	Vacuum sheet stacker vents
	1	Emissions from wastewater discharges to publicly owned treatment works (POTW) provided the source is authorized to discharge to the POTW, not including on-site wastewater treatment and/or holding facilities
	1	Log ponds
	1	Storm water settling basins
	1	Fire suppression and training
1		Paved roads and paved parking lots within an urban growth boundary
	1	Hazardous air pollutant emissions in fugitive dust from paved and unpaved roads except for those sources that have processes or activities that contribute to the deposition and entrainment of hazardous air pollutants from surface soils
	1	Health, safety, and emergency response activities



## ACDP PERMIT PROGRAM CATEGORICALLY INSIGNIFICANT ACTIVITIES

FORM AQ404 ANSWER SHEET

Yes	No	Type of activity
	1	Emergency generators and pumps used only during loss of primary equipment or utility service due to circumstances beyond the reasonable control of the owner or operator, or to address a power emergency, provided that the aggregate horsepower rating of all stationary emergency generator and pump engines is not more than 3,000 horsepower. If the aggregate horsepower rating of all stationary emergency generator and pump engines is more than 3,000 horsepower, then no emergency generators and pumps at the source may be considered categorically insignificant
	1	Non-contact steam vents and leaks and safety and relief valves for boiler steam distribution systems
	1	Non-contact steam condensate flash tanks
	1	Non-contact steam vents on condensate receivers, deaerators and similar equipment
	1	Boiler blow down tanks
	1	Industrial cooling towers that do not use chromium-based water treatment chemicals
	1	Ash piles maintained in a wetted condition and associated handling systems and activities
	1	Uncontrolled oil/water separators in effluent treatment systems, excluding systems with a throughput of more than 400,000 gallons per year of effluent located at the following sources:  A. Petroleum refineries;  B. Sources that perform petroleum refining and re-refining of lubricating oils and greases including asphalt production by distillation and the reprocessing of oils and/or solvents for fuels; or  C. Bulk gasoline plants, bulk gasoline terminals, and pipeline facilities
	1	Combustion source flame safety purging on startup
	1	Broke beaters, pulp and repulping tanks, stock chests and pulp handling equipment, excluding thickening equipment and repulpers
	1	Stock cleaning and pressurized pulp washing, excluding open stock washing systems
	1	White water storage tanks