Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

Facility Name: Schnitzer Southeast Holdings, LLC
Facility Address: 6781 Chapman Road
Lithonia, Georgia 30058 (Dekalb County)
Mailing Address: 6781 Chapman Road
Lithonia, Georgia 30058

Facility AIRS Number: 04-13-089-00392

is issued a Permit for the following:

The construction and operation of a recycler and processor of scrap material.

This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 28330 dated March 17, 2022; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 8 pages.

Richard E. Dunn, Director
Environmental Protection Division
## ATTACHMENT A

<table>
<thead>
<tr>
<th>Source Code</th>
<th>Description</th>
<th>Installation Date</th>
<th>Source Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>WC01</td>
<td>Wire Chop Line</td>
<td>2014</td>
<td>BH01*</td>
<td>Cyclone/Baghouse</td>
</tr>
<tr>
<td>SR02</td>
<td>Metal Shredder (Wendt 80105); New motor and 180 tons/hr throughput</td>
<td>2019/2022 (motor)</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>CS01</td>
<td>Color Sorter (Combisense [CRGB-EMB][S-1200][B])</td>
<td>2019</td>
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</tr>
</tbody>
</table>

*BH01 is inherent to the process and is not considered a control device, but process equipment.*
1. General Requirements

1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.

1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.

1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-01(pp), which may result in air pollution and which is not exempt under 391-3-1-03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.

1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.

1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

2.1 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from all process equipment, any gases which exhibit visible emissions, the opacity of which is equal to or greater than 40 percent, unless otherwise specified.

2.2 The Permittee shall operate the baghouse (Source Code: BH01) at all times that the wire chop line (Source Code: WC01) is in operation.
2.3 The Permittee shall not cause, let, suffer, permit, or allow the emission from any source, particulate matters (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below, unless otherwise specified in this Permit.

[391-3-1-.02(2)(e)1]

a. For equipment in operation or extensively altered after July 2, 1968:

   i. \( E = 4.1P^{0.67} \), for process input weight rate up to and including 30 tons per hour;

   ii. \( E = 55P^{0.11} - 40 \), for process input weight rate in excess of 30 tons per hour.

b. For equipment in operation or under construction contract on or before July 2, 1968:

   \( E = 4.1P^{0.67} \)

Where:

\( E \) = allowable emission rate in pounds per hour;

\( P \) = process input weight rate in tons per hour.

2.4 The Permittee shall have a throughput limit of 137,500 tons per 12 consecutive months for automobiles shred by the shredder SR02.

[Avoidance of Title V - 40 CFR 70]

2.5 The Permittee shall have a throughput limit of 275,000 tons per 12 consecutive months for automobiles and light irons shred by the shredder SR02.

[Avoidance of Title V - 40 CFR 70]

2.6 The facility is subject to Georgia Rule 391-3-1-.02(2)(tt) - VOC Emissions from Major Sources.

[391-3-1-.02(2)(tt)]

2.7 As VOC RACT, the Permittee shall use best management practices such as draining fluids prior to shredding, and inspecting incoming loads.

[391-3-1-.02(2)(tt)]

2.8 The total tons of automobiles and light iron shredded per day shall be limited according to the following:

\[
X + \frac{Y}{14.8} \leq 900
\]
Where:

\[ X = \text{tons of automobiles shredded per day} \]
\[ Y = \text{tons of light iron shredded per day} \]

\[ 14.8 = \text{ratio of the benzene emission factor for shredding automobiles to the benzene emission factor for shredding light iron} \]

3. Fugitive Emissions

3.1 The Permittee shall take all reasonable precautions to prevent fugitive dust from becoming airborne from any operation, process, handling, and transportation or storage facility. The opacity from any fugitive dust source shall not equal or exceed twenty percent. Reasonable precautions that should be taken to prevent dust from becoming airborne include, but are not limited to, the following:

[391-3-1-.02(2)(n)]

a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;

b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;

c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;

d. Covering, at all times when in motion, open-bodied trucks, transporting materials likely to give rise to airborne dust; and

e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

4. Process & Control Equipment

4.1 Routine maintenance shall be performed on all air pollution process and control equipment. The Permittee shall record and maintain records of routine maintenance in a form suitable for inspection or submittal to the Division.

4.2 The Permittee shall maintain an inventory of baghouse filter bags such that an adequate supply of bags is on hand to replace any defective ones.

[391-3-1-.02(6)(b)1]
5. Monitoring

5.1 Once each day, or portion of each day of operation, the Permittee shall perform a check for visible emissions from each baghouse and inspect emissions units for mechanical problems or malfunction. For any observation of visible emissions, mechanical problems, or malfunctions, the Permittee shall take corrective action and reinspect the equipment to verify that no visible emissions exist and that any mechanical problems or malfunctions have been corrected. The observations and corrective actions shall be recorded in a log and maintained in a condition suitable for inspection by, or submittal to, the Division.

[391-3-1-.02(6)(b)1]

5.2 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

[391-3-1-.02(6)(b)1]

a. Pressure drop across baghouse unit BH01. Data shall be recorded at least once per operating day.

5.3 The Permittee shall implement a Preventive Maintenance Program for baghouse BH01. At a minimum, the following operation and maintenance checks shall be made and a record of the findings and corrective actions taken shall be kept in a maintenance log:

[391-3-1-.02(6)(b)1]

a. Record the pressure drop across each baghouse and ensure that it is within the range determined to indicate compliance. This check shall occur at least once per operating day.

b. Check the baghouses for proper operation on a weekly basis.

i. For baghouses equipped with compressed air cleaning systems, check the system for proper operation. This may include checking for low pressure, leaks, proper lubrication, and proper operation of timer and valves.

ii. For baghouses equipped with reverse air cleaning systems, check the system for proper operation. This may include checking damper, bypass, and isolation valves for proper operation.

iii. For baghouses equipped with shaker cleaning systems, check the system for proper operation. This may include checking shaker mechanism for loose or worn bearings, drive components, mounting; proper operation of outlet/isolation valves; proper lubrication.
c. Check dust collector hoppers and conveying systems for proper operation, on a weekly basis.

6. Performance Testing

6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:

a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division’s Procedures for Testing and Monitoring Sources of Air Pollutants.

b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.

c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.

d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

7. Notification, Reporting and Record Keeping Requirements

7.1 The Permittee shall maintain a daily operating log for the Wire Chop Line (Source Code: WC01) which indicates each time (hr: minutes) that a source is started up or shut down. The log shall be maintained in a form suitable and available for inspection by the Division, and shall be retained for at least five years from the date of last entry. [391-3-1-.02(6)(b)1]

7.2 The Permittee shall maintain a daily operating log for the metal shredder (Source Code: SR02) which indicates each time (hr: minutes) that a source is started up or shut down. The log shall be maintained in a form suitable and available for inspection by the Division, and shall be retained for at least five years from the date of last entry. [391-3-1-.02(6)(b)1]

7.3 The Permittee shall maintain a daily operating log for the color sorter (Source Code: CS01) which indicates each time (hr: minutes) that a source is started up or shut down. The log shall
be maintained in a form suitable and available for inspection by the Division, and shall be 
retained for at least five years from the date of last entry.

[391-3-1-.02(6)(b)1]

7.4 The Permittee shall maintain records of daily shredding throughput (reported as tons of 
automobiles and/or light iron, as based on purchase records) for the metal shredder (Source 
Code: SR02). This information shall be recorded in a permanent form suitable and available 
for inspection.

[Avoidance of 40 CFR 52.21]

7.5 As VOC RACT, the Permittee shall maintain a daily operating log of the use of best 
management practices such as draining fluids prior to shredding, and inspecting incoming 
loads.

7.6 As VOC RACT, the Permittee shall implement and maintain a scrap acceptance policy.

7.7 The Permittee shall maintain records of monthly shredding throughput (reported as tons of 
automobiles and/or light iron, as based on purchase records) using the daily logs required in 
Condition 7.4, for the metal shredder (Source Code: SR02). This information shall be recorded 
in a permanent form suitable and available for inspection.

[Avoidance of 40 CFR 52.21]

7.8 The Permittee shall maintain records of monthly shredding throughput (reported as tons of 
automobiles and/or light iron, as based on purchase records) for the metal shredder (Source 
Code: SR02) required in Permit Condition 7.7 and calculate the 12-consecutive month 
throughput. This information shall be recorded in a permanent form suitable and available for 
inspection.

[Avoidance of 40 CFR 52.21]

7.9 The Permittee shall report any exceedance of the limits in Permit Condition Nos. 2.4 and 2.5 to 
the Division.

7.10 The Permittee shall furnish the Division written notification of the date of the initial startup of 
the metal shredder (Source Code: SR02) after installation of the new motor within 15 days after 
such date.

[40 CFR 60.7]
8. Special Conditions

8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.

8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the “Procedures for Calculating Air Permit Application & Annual Permit Fees.”