



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: October 13, 2026

Effective Date: October 13, 2026

Expiration Date: April 30, 2028

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to construct, install, modify or reactivate the air emission source(s) more fully described in the site inventory list. This Facility is subject to all terms and conditions specified in this plan approval. Nothing in this plan approval relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each plan approval condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated as "State-Only" requirements.

Plan Approval No. 37-00377B

Federal Tax Id - Plant Code: 26-2008403-1

Owner Information

Name: US ROLLOFFS INC
Mailing Address: 409 SMALLS FERRY RD
NEW CASTLE, PA 16102-2831

Plant Information

Plant: US ROLLOFFS GARDNER AVE/LAWRENCE
Location: 37 Lawrence County 37001 New Castle City
SIC Code: 5093 Wholesale Trade - Scrap And Waste Materials

Responsible Official

Name: JEFFREY J ROMANO
Title: VICE PRESIDENT
Phone: (724) 510 - 4463 Email: usrolloffs@gmail.com

Plan Approval Contact Person

Name: JEFFREY ROMANO
Title: VICE PRESIDENT
Phone: (724) 510 - 4463 Email: usrolloffs@gmail.com

[Signature] _____
LORI L. MCNABB, NORTHWEST REGION AIR PROGRAM MANAGER



Plan Approval Description

This Plan Approval is for the installation of an additional 20,000 CFM baghouse to the current control system. Additionally, Outdoor cutting operations are authorized as part of Plan Approval 37-00377B.

Previous Plan Approval 37-00377A authorized the following existing equipment:

- Three (3) oxygen/natural gas (propane), low emission, cutting torches
- One (1) custom, partially enclosed cutting area/hood equipped with a 42,000 acfm cartridge type fabric filtration control system
- Railcar unloading and loading
- Truck unloading and loading
- Material Handling
- Drop Ball
- Material Storage/Stockpiles
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Note: These same sub-sections are repeated for each source!

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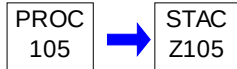
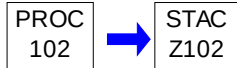
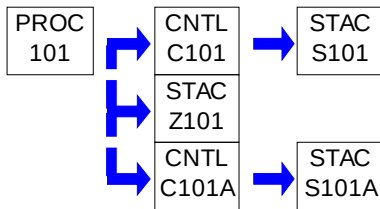
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**SECTION A. Plan Approval Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
101	TORCH CUTTING (THREE TORCHES)	N/A	Natural Gas
102	MATERIAL HANDLING		
105	OUTDOOR CUTTING TORCH(ES) (1)		
C101	SCRAP CUTTING BAGHOUSE SYSTEM		
C101A	BAGHOUSE #2 (20,000 CFM)		
S101	SCRAP CUTTING BAGHOUSE SYSTEM STACK		
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Z101	TORCH CUTTING FUGITIVES		
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PERMIT MAPS

**SECTION B. General Plan Approval Requirements****#001 [25 Pa. Code § 121.1]****Definitions**

Words and terms that are not otherwise defined in this plan approval shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.12b (a) (b)]**Future Adoption of Requirements**

The issuance of this plan approval does not prevent the future adoption by the Department of any rules, regulations or standards, or the issuance of orders necessary to comply with the requirements of the Federal Clean Air Act or the Pennsylvania Air Pollution Control Act, or to achieve or maintain ambient air quality standards. The issuance of this plan approval shall not be construed to limit the Department's enforcement authority.

#003 [25 Pa. Code § 127.12b]**Plan Approval Temporary Operation**

This plan approval authorizes temporary operation of the source(s) covered by this plan approval provided the following conditions are met.

(a) When construction, installation, modification, or reactivation is being conducted, the permittee shall provide written notice to the Department of the completion of the activity approved by this plan approval and the permittee's intent to commence operation at least five (5) working days prior to the completion of said activity. The notice shall state when the activity will be completed and when the permittee expects to commence operation. When the activity involves multiple sources on different time schedules, notice is required for the commencement of operation of each source.

(b) Pursuant to 25 Pa. Code § 127.12b (d), temporary operation of the source(s) is authorized to facilitate the shakedown of sources and air cleaning devices, to permit operations pending the issuance of a permit under 25 Pa. Code Chapter 127, Subchapter F (relating to operating permits) or Subchapter G (relating to Title V operating permits) or to permit the evaluation of the air contaminant aspects of the source.

(c) This plan approval authorizes a temporary operation period not to exceed 180 days from the date of commencement of operation, provided the Department receives notice from the permittee pursuant to paragraph (a), above.

(d) The permittee may request an extension of the 180-day shakedown period if further evaluation of the air contamination aspects of the source(s) is necessary. The request for an extension shall be submitted, in writing, to the Department at least 30 days prior to the end of the initial 180-day shakedown period and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established. This temporary operation period will be valid for a limited time and may be extended for additional limited periods, each not to exceed 180 days.

(e) The notice submitted by the permittee pursuant to subpart (a) above, prior to the expiration of the plan approval, shall modify the plan approval expiration date on Page 1 of this plan approval. The new plan approval expiration date shall be 180 days from the date of commencement of operation.

#004 [25 Pa. Code § 127.12(a) (10)]**Content of Applications**

The permittee shall maintain and operate the sources and associated air cleaning devices in accordance with good engineering practice as described in the plan approval application submitted to the Department.

#005 [25 Pa. Code §§ 127.12(c) and (d) & 35 P.S. § 4013.2]**Public Records and Confidential Information**

(a) The records, reports or information obtained by the Department or referred to at public hearings shall be available to the public, except as provided in paragraph (b) of this condition.

(b) Upon cause shown by the permittee that the records, reports or information, or a particular portion thereof, but not emission data, to which the Department has access under the act, if made public, would divulge production or sales figures or methods, processes or production unique to that person or would otherwise tend to affect adversely the

**SECTION B. General Plan Approval Requirements**

competitive position of that person by revealing trade secrets, including intellectual property rights, the Department will consider the record, report or information, or particular portion thereof confidential in the administration of the act. The Department will implement this section consistent with sections 112(d) and 114(c) of the Clean Air Act (42 U.S.C.A. § 7412(d) and 7414(c)). Nothing in this section prevents disclosure of the report, record or information to Federal, State or local representatives as necessary for purposes of administration of Federal, State or local air pollution control laws, or when relevant in a proceeding under the act.

#006 [25 Pa. Code § 127.12b]**Plan Approval Terms and Conditions**

[Additional authority for this condition is derived from 25 Pa. Code Section 127.13]

(a) This plan approval will be valid for a limited time, as specified by the expiration date contained on Page 1 of this plan approval. Except as provided in § 127.11a and 127.215 (relating to reactivation of sources; and reactivation), at the end of the time, if the construction, modification, reactivation or installation has not been completed, a new plan approval application or an extension of the previous approval will be required.

(b) If construction has commenced, but cannot be completed before the expiration of this plan approval, an extension of the plan approval must be obtained to continue construction. To allow adequate time for departmental action, a request for the extension shall be postmarked at least thirty (30) days prior to the expiration date. The request for an extension shall include the following:

- (i) A justification for the extension,
- (ii) A schedule for the completion of the construction

If construction has not commenced before the expiration of this plan approval, then a new plan approval application must be submitted and approval obtained before construction can commence.

(c) If the construction, modification or installation is not commenced within 18 months of the issuance of this plan approval or if there is more than an 18-month lapse in construction, modification or installation, a new plan approval application that meets the requirements of 25 Pa. Code Chapter 127, Subchapter B (related to plan approval requirements), Subchapter D (related to prevention of significant deterioration of air quality), and Subchapter E (related to new source review) shall be submitted. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

#007 [25 Pa. Code § 127.32]**Transfer of Plan Approvals**

(a) This plan approval may not be transferred from one person to another except when a change of ownership is demonstrated to the satisfaction of the Department and the Department approves the transfer of the plan approval in writing.

(b) Section 127.12a (relating to compliance review) applies to a request for transfer of a plan approval. A compliance review form shall accompany the request.

(c) This plan approval is valid only for the specific source and the specific location of the source as described in the application.

#008 [25 Pa. Code § 127.12(a)(4) & 35 P.S. § 4008 & § 114 of the CAA]**Inspection and Entry**

(a) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.

(b) The permittee shall also allow the Department to have access at reasonable times to said sources and associated air cleaning devices with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act and regulations adopted under the act.

**SECTION B. General Plan Approval Requirements**

(c) Nothing in this plan approval condition shall limit the ability of the Environmental Protection Agency to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

#009 [25 Pa. Code 127.13a]**Plan Approval Changes for Cause**

This plan approval may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

(a) The permittee constructs or operates the source subject to the plan approval in violation of the act, the Clean Air Act, the regulations promulgated under the act or the Clean Air Act, a plan approval or permit or in a manner that causes air pollution.

(b) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.

(c) The permittee fails to submit a report required by this plan approval.

(d) The Environmental Protection Agency determines that this plan approval is not in compliance with the Clean Air Act or the regulations thereunder.

#010 [25 Pa. Code §§ 121.9 & 127.216]**Circumvention**

(a) The permittee, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

(b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this plan approval, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#011 [25 Pa. Code § 127.12c]**Submissions**

Reports, test data, monitoring data, notifications shall be submitted to the:

Regional Air Program Manager

PA Department of Environmental Protection

(At the address given on the plan approval transmittal letter or otherwise notified)

#012 [25 Pa. Code § 127.12(a)(9) & 40 CFR Part 68]**Risk Management**

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).

(b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the facility. The permittee shall submit the RMP to the Environmental Protection Agency according to the following schedule and requirements:

(1) The permittee shall submit the first RMP to a central point specified by the Environmental Protection Agency no later than the latest of the following:

**SECTION B. General Plan Approval Requirements**

- (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
- (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

(2) The permittee shall submit any additional relevant information requested by the Department or the Environmental Protection Agency concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.

(c) As used in this plan approval condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

#013 [25 Pa. Code § 121.7]**Prohibition of Air Pollution**

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. §§ 4001-4015).

#014 [25 Pa. Code § 127.25]**Compliance Requirement**

A person may not cause or permit the operation of a source subject to § 127.11 (relating to plan approval requirements), unless the source and air cleaning devices identified in the application for the plan approval and the plan approval issued to the source, are operated and maintained in accordance with specifications in the application and conditions in the plan approval issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.

**SECTION C. Site Level Plan Approval Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §121.7]****Prohibition of air pollution.**

No person may permit air pollution as that term is defined in the act.

[From Plan Approval 37-00377A]

002 [25 Pa. Code §123.1]**Prohibition of certain fugitive emissions**

(a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:

(1) Construction or demolition of buildings or structures.

(2) Grading, paving and maintenance of roads and streets.

(3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.

(4) Clearing of land.

(5) Stockpiling of materials.

(6) N/A (Air Basin)

(7) N/A

(8) N/A

(9) Sources and classes of sources other than those identified in paragraphs (1)-(8), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

(i) the emissions are of minor significance with respect to causing air pollution; and

(ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

(b) An application form for requesting a determination under either subsection (a)(9) or 129.15(c) is available from the Department. In reviewing these applications, the Department may require the applicant to supply information including, but not limited to, a description of proposed control measures, characteristics of emissions, quantity of emissions, and ambient air quality data and analysis showing the impact of the source on ambient air quality. The applicant shall be required to demonstrate that the requirements of subsections (a)(9) and (c) and 123.2 (relating to fugitive particulate matter) or of the requirements of 129.15(c) have been satisfied. Upon such demonstration, the Department will issue a determination, in writing, either as an operating permit condition, for those sources subject to permit requirements under the act, or as an order containing appropriate conditions and limitations.

(c) A person responsible for any source specified in subsections (a)(1) -- (7) or (9) shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

(1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.

(2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.

(3) Paving and maintenance of roadways.

**SECTION C. Site Level Plan Approval Requirements**

(4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

(d) N/A

003 [25 Pa. Code §123.2]**Fugitive particulate matter**

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

004 [25 Pa. Code §123.31]**Limitations**

(a) Limitations are as follows:

(1) N/A

(2) N/A

(b) A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

(c) N/A

005 [25 Pa. Code §127.12b]**Plan approval terms and conditions.****# 006 [25 Pa. Code §129.14]****Open burning operations**

The facility is located in an air basin and subject to the following open burning conditions [25 Pa Code §129.14]:

(a) Air basins. No person may permit the open burning of material in an air basin.

(b) Not applicable

(c) Exceptions: The requirements of subsections (a) and (b) do not apply where the open burning operations result from:

(1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.

(2) A fire set for the purpose of instructing personnel in firefighting, when approved by the Department.

(3) A fire set for the prevention and control of disease or pests, when approved by the Department.

(4) N/A

(5) N/A

(6) N/A

(7) N/A

(d) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:

**SECTION C. Site Level Plan Approval Requirements**

(1) As used in this subsection the following terms shall have the following meanings:

Air curtain destructor -- A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased, and smoke and other particulate matter are contained.

Clearing and grubbing wastes -- Trees, shrubs, and other native vegetation which are cleared from land during or prior to the process of construction. The term does not include demolition wastes and dirt laden roots.

(2) Subsection (a) notwithstanding, clearing and grubbing wastes may be burned in a basin subject to the following requirements:

(i) Air curtain destructors shall be used when burning clearing and grubbing wastes.

(ii) Each proposed use of air curtain destructors shall be reviewed and approved by the Department in writing with respect to equipment arrangement, design and existing environmental conditions prior to commencement of burning. Proposals approved under this subparagraph need not obtain plan approval or operating permits under Chapter 127 (relating to construction modification, reactivation and operation of sources).

(iii) Approval for use of an air curtain destructor at one site may be granted for a specified period not to exceed 3 months but may be extended for additional limited periods upon further approval by the Department.

(iv) The Department reserves the right to rescind approval granted if a determination by the Department indicates that an air pollution problem exists.

(3) Not applicable

(4) During an air pollution episode, open burning is limited by Chapter 137 (relating to air pollution episodes) and shall cease as specified in such chapter.

[This permit does not constitute authorization to burn solid waste pursuant to Section 610(3) of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act.]

[From Plan Approval 37-00377A]

II. TESTING REQUIREMENTS.

007 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

If, at any time, the Department has cause to believe that air contaminant emissions from the sources listed in this Plan Approval may be in excess of the limitations specified in or established pursuant to this plan approval or the permittee's operating permit, the permittee may be required to conduct test methods and procedures deemed necessary by the Department to determine the actual emissions rate. Such testing shall be conducted in accordance with 25 Pa. Code Chapter 139, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.

[From Plan Approval 37-00377A]

III. MONITORING REQUIREMENTS.

008 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

A facility-wide inspection shall be conducted at a minimum of once each day that the facility is operated, during daylight hours, and while the sources are operating. The permittee shall monitor the perimeter of the facility for the presence of the following:

- a. Visible fugitive particulate emissions;
- b. Potentially objectionable odors at the property line.

**SECTION C. Site Level Plan Approval Requirements**

If any fugitive emissions or potentially objectionable odors are apparent, the permittee shall take corrective action.

All detected visible fugitive emissions shall be reported to the shift supervisor.

[From Plan Approval 37-00377A]

IV. RECORDKEEPING REQUIREMENTS.**# 009 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The Permittee shall maintain a record of the environmental permit awareness training performed for each employee.

[From Plan Approval 37-00377A]

010 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Maintenance records shall, at a minimum, contain the dates of the inspections, any problems or defects, any actions taken to correct the problems or defects, and any routine maintenance performed.

[From Plan Approval 37-00377A]

011 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall maintain a record of all the facility-wide inspections performed for visible fugitive emissions and potentially objectionable odors.

The inspection records shall include the date, time, name and title of the observer, whether any visible fugitive emissions or potentially objectionable odors, were observed, and any corrective action.

[From Plan Approval 37-00377A]

012 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

All logs and required records shall be maintained on site, or at an alternative location acceptable to the Department, for a minimum of five (5) years and shall be made available to the Department upon request.

[From Plan Approval 37-00377A]

V. REPORTING REQUIREMENTS.**# 013 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Malfunction reporting shall be conducted as follows:

(a) For the purpose of this condition, a malfunction is defined as any sudden, infrequent, and not reasonably preventable failure of a source to operate in a normal or usual manner that results in, or potentially results in, air contaminant emissions in excess of an applicable emission limitation, or which may be reasonably expected to create off-site impacts, such as large dust plumes, heavy smoke, or a spill or release that results in a malodor that is detectable outside the property on whose land the source is being operated. Any failure of an air cleaning device that is required under this permit shall be reported as a malfunction.

(b) Any malfunction that poses an imminent danger to the public health, safety, or welfare to the environment shall be reported by telephone to the County Emergency Management Agency (911 Center), and to the 24-hour Emergency Hotline of the appropriate Department Regional Office (814-332-6945) no later than one hour after the discovery of an incident. Following the telephone notification, a written notice shall be submitted to the Department no later than the next business day.

(c) All other malfunctions shall be reported to the Department no later than the next business day.

**SECTION C. Site Level Plan Approval Requirements**

(d) Initial reporting of the malfunction shall identify the following items to the extent known:

- (i) The name and location of the facility;
- (ii) The nature and cause of the malfunction;
- (iii) The time when the malfunction or breakdown was first observed;
- (iv) The expected duration of increased emissions; and
- (v) The estimated rate of emissions.

(e) The Owner or Operator shall also notify the Department immediately, by telephone, when corrective measures for malfunctions meeting the criteria in (b) have been accomplished.

(f) All malfunctions shall be reported to the Department by email (addresses will be provided by the Department), or by regular mail at the address below:

PADEP
Office of Air Quality
230 Chestnut Street
Meadville, PA 16335

(g) If requested by the Department, the Owner/Operator shall submit a full written report to the Department, including final determinations of the items identified in (d), and the corrective measures taken on the malfunction. The report shall be submitted within 15 days of the Department's request or accomplishing corrective measures, whichever is later.

[From Plan Approval 37-00377A]

014 [25 Pa. Code §127.12b]
Plan approval terms and conditions.

Upon determination by the Owner/Operator that the source(s) covered by this Plan Approval are in compliance with all conditions of the Plan Approval the Owner/Operator shall contact the Department's reviewing engineer and schedule the Initial Operating Permit Inspection.

[From Plan Approval 37-00377A]

015 [25 Pa. Code §127.12b]
Plan approval terms and conditions.

Upon completion of the Initial Operating Permit Inspection and determination by the Department that the source(s) covered by this Plan Approval are in compliance with all conditions of the Plan Approval the Owner/Operator shall submit an administrative amendment application to the State Only Operating Permit or include the sources covered by this plan approval in the State Only Operating Permit Renewal application for this Facility.

[From Plan Approval 37-00377A]

VI. WORK PRACTICE REQUIREMENTS.

016 [25 Pa. Code §127.12b]
Plan approval terms and conditions.

All air contamination sources and air cleaning devices authorized under this plan approval shall be installed, maintained and operated per the manufacturer's specification and recommended maintenance schedule, if available; and in accordance with good air pollution control practices.

[From Plan Approval 37-00377A]

017 [25 Pa. Code §127.12b]
Plan approval terms and conditions.

Environmental permit awareness training shall be provided to each employee that includes, at a minimum:

- Provide an overview of permit limitations, testing, work practices, monitoring, recordkeeping and reporting requirements
- Identify work practices to minimize visible fugitive emissions
- Identify personnel responsible for visible fugitive emission and visible emission inspections

**SECTION C. Site Level Plan Approval Requirements**

- Identify corrective actions and procedures for the implementation of corrective actions
- Identify personnel responsible for documentation and the documentation requirements

This training shall be performed prior to the initial plan approval compliance demonstration inspection for each employee and then upon start-date of new employees, thereafter.

[From Plan Approval 37-00377A]

018 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

(a) A supervisor or "designated observer" shall be on site at all times that cutting operations are occurring. The supervisor/ "designated observer" shall be responsible for performing visible emission observations, monitoring adverse meteorological conditions, and halting cutting when fugitives are nearing the property boundaries.

(b) The supervisor/ "designated observer" shall be trained on each of the following topics below. The training shall be documented on a "Training Record Form".

- Types of visible particulate emissions, what opacity is, and how/when to determine if there is sustained visible emissions
- Location of all facility property boundaries, along with visual markers on how to determine the property boundary.
- What types of adverse meteorological conditions can occur, and how to properly determine when they will interfere with smoke dissipation.
- Decision criteria for pausing cutting operations. This shall include when to pause, how long to pause for, and steps to be taken before starting cutting again

(c) The supervisor/"designated observer" shall adhere to their training for stopping and resuming cutting operations.

(d) The Supervisor/designated observer shall halt cutting anytime that operating conditions, or operations cause adverse fugitive emissions as described in their training.

[From Plan Approval 37-00377B]

VII. ADDITIONAL REQUIREMENTS.**# 019 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

All employees shall observe their cutting operations for visible fugitive emissions heading towards the property line. If any visible fugitive emissions are noticed, cutting shall halt, and the supervisor/"designated observer" shall be notified immediately. Cutting shall not resume until the supervisor/"designated observer" has determined that operating conditions are stable and fugitive emissions have dissipated in accordance with their training.

[From Plan Approval 37-00377B]

020 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall be responsible for knowing the composition of the material being torch cut on site and shall provide this documentation at the department's request.

021 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

This Plan Approval 37-00377B supersedes Plan Approval 37-00377A.

VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this plan approval including Section B (relating to Plan Approval General Requirements).

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

**SECTION D. Source Level Plan Approval Requirements**

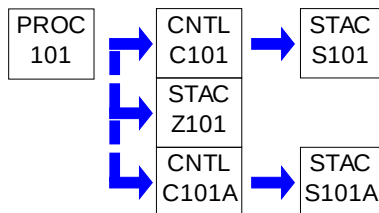
Source ID: 101

Source Name: TORCH CUTTING (THREE TORCHES)

Source Capacity/Throughput:

N/A

Natural Gas

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.21]****General**

(a) This section applies to sources except those subject to other provisions of this article, with respect to the control of sulfur compound emissions.

(b) No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

[Compliance shall be demonstrated by using pipeline quality natural gas or propane as fuel]

002 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The concentration of particulate matter in the effluent gas from the dust collector/ baghouse shall not exceed 0.02 gr/dscf.

Compliance with this condition shall be deemed satisfied if:

- the baghouse capture and control system is operated in accordance with the manufacturer's specifications, if available, and/or good operating practices; and
- the baghouse capture and control system is maintained per manufacturer's recommended maintenance schedule, if available, and/or good operating practices.

[This particulate matter concentration BAT determination supersedes and ensures compliance with the 25 Pa. Code 123.13 process particulate matter emission limitation of 0.04 gr/dscf]

[From Plan Approval 37-00377A]

003 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Visible emissions from the stack(s) shall not equal or exceed 10% opacity at any time. If any visible emissions are noted the owner/operator shall take corrective action.

Compliance with the 10% opacity limit shall be assured by conducting visual emission observations of the baghouse stack(s) on a daily basis (when source is operating).

[This opacity limit BAT determination supersedes and ensures compliance with 25 Pa. Code 123.41 opacity limitations of 20/60%]

[From Plan Approval 37-00377B]

**SECTION D. Source Level Plan Approval Requirements****# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The following restrictions shall apply to the torch cutting operations:

- All torch cutting activities shall take place within the capture area of the partially enclosed fume/smoke collection hood.
- A maximum of 3 torches can be used at a time.
- Only low carbon steel may be cut that includes but is not limited to: Tundish, Ladle Lips, various Scrap Manufactured Steel, Plate & Structural Steel, (P & S) (straight/flat scrap), Heavy Melt (round & twisted/bent scrap), and Railroad rail.
- Scrap pieces shall be positioned at all times so as to maintain an air gap between the ground and material being cut.
- No high chromium, nickel chrome alloys, or stainless steel containing scrap may be cut on site without prior written approval from the Department.

[From Plan Approval 37-00377A]

Fuel Restriction(s).**# 005 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Pipeline quality natural gas or equivalent (propane) in combination with oxygen shall be permitted for combustion in the torch(es).

[From Plan Approval 37-00377A]

Throughput Restriction(s).**# 006 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The material throughput shall not exceed 109,000 tons on a consecutive 12-month rolling basis.

[This value is based on the permittee's average cutting rate of 12.5 tons/hr estimation and 8760 hours per year]

[From Plan Approval 37-00377A]

II. TESTING REQUIREMENTS.**# 007 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

- (1) A device approved by the Department and maintained to provide accurate opacity measurements.
- (2) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

008 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall conduct a performance evaluation of each Baghouse Leak Detection System (BLDS) in accordance with a site-specific monitoring plan.

The permittee shall develop, and submit to the Department for approval, upon request, a site-specific monitoring plan that addresses the following:

- (i) Installation of the BLDS;
- (ii) Performance and equipment specifications;
- (iii) Performance evaluation procedures and acceptance criteria (e.g., calibrations).

**SECTION D. Source Level Plan Approval Requirements**

- (iv) Initial and periodic adjustment of the BLDS, including how the alarm set-point will be established;
- (v) Operation of the BLDS, including quality assurance procedures;
- (vi) How the BLDS will be maintained, including a routine maintenance schedule and spare parts inventory list;
- (vii) How the BLDS output will be recorded and stored.
- (viii) Ongoing operation, quality assurance, maintenance, and reporting procedures;
- (ix) Ongoing data quality assurance procedures. (QA/QC guidance may be found in 40 CFR § 63.8(d));
- (x) Ongoing recordkeeping and reporting procedures;
- (xi) How the bag leak detection systems will comply with the provisions of this plan approval.
- (xii) The manufacturer's recommended procedures and specifications and good engineering practices for installing, testing and operating the bag leak detection systems.

The permittee shall submit a monitoring plan to the Department's Northwest Regional Office at least 90 days prior to the scheduled source testing (Method 9) required by this plan approval. This monitoring plan shall identify how the bag leak detection systems will comply with the provisions of this plan approval.

[From Plan Approval 37-00377A]

009 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Within 180 days of the issuance of Plan Approval 37-00377B an EPA Method 9 visual determination of the opacity of emissions shall be performed to demonstrate initial compliance with the baghouse/capture system opacity limit. This test shall be conducted while the source(s) are operating within 90% of routine maximum capacity. This testing shall not be performed until all upgrades to the baghouse capture system have been completed as approved by the Department.

If more time is needed to complete these testing requirements, the permittee shall submit an extension request to the Department for review/approval.

III. MONITORING REQUIREMENTS.**# 010 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) The permittee shall adhere to the control device's approved indicator range so that operation within the range shall provide reasonable assurance of compliance. The indicator ranges must be approved by the Department. The following indicator ranges shall be determined during the initial performance test or any subsequent Department approved performance tests unless otherwise stated:

1. The permittee shall develop an indicator range for airflow, measured as fan amperage or frequency, during their most recent department approved stack testing program, as applicable.
2. Triboelectric leak detection (BLDS) status/value.
3. Opacity reading.

(b) The Department, at its discretion, may approve or deny a request to adjust the required indicator ranges.

(c) The permittee shall utilize approved QA/QC practices that are adequate to ensure continuing validity of data and proper performance of the control device.

1. The permittee shall maintain detectors or sensors at Department approved locations for obtaining data that is representative of the monitored indicator.
2. The permittee shall maintain verification procedures to confirm that the operational status of the monitoring devices is within the expected range. (Operational status pertains to the accuracy of the measured values.)
3. For QA/QC purposes, the permittee shall calibrate and check the accuracy of the monitoring equipment, according to the manufacturer's recommended procedures.

[From Plan Approval 37-00377A]

011 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

**SECTION D. Source Level Plan Approval Requirements**

The permittee shall perform a daily operational inspection of the control device at least once during each shift that torch cutting is in operation for the presence of visible emissions.

As part of this operational inspection, the facility shall verify the bag leak detection system is operating, and shall conduct a 5 minute visible emission (VE) observation of the baghouse stack.

If any visible emissions are apparent, the permittee shall take immediate action to eliminate them or suspend torch cutting until corrective action can be taken.

If any visible emissions are apparent after the corrective action, the torch cutting shall be suspended until the permittee can verify compliance with the opacity standards specified in the permit through methods prescribed in 25 Pa Code 123.43, such as Method 9 readings taken by a certified visible emissions reader.

012 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall perform a daily operational inspection of the baghouse capture system (hood/partial enclosure) at least once during each shift that torch cutting is in operation for the presence of visible fugitive emissions.

If any visible fugitive emissions are apparent, the permittee shall take immediate action to eliminate them or suspend torch cutting until corrective action can be taken.

[From Plan Approval 37-00377A]

013 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The bag leak detection systems (BLDS) shall be installed, calibrated and put into operation on the baghouse to monitor the baghouse and filter performance.

Each BLDS must be installed, operated, calibrated, and maintained in a manner consistent with the manufacturer's written specifications and recommendations, in accordance with the guidance provided in EPA-454/R-98-015, September 1997, and in accordance with good air pollution control practices.

The BLDS must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 10 or fewer milligrams per actual cubic meter (0.0044 gr/cf).

The BLDS sensor must provide output of absolute PM loadings.

[From Plan Approval 37-00377A]

The BLDS must be equipped with a device to continuously record the output signal from the sensor.

The BLDS must be equipped with an alarm system that will alert an operator automatically when an increase in relative PM emissions over a preset level is detected. The alarm must be located such that the alert is detected and recognized easily by an operator.

For positive pressure fabric filter system that do not duct all compartments of cells to a common stack, a BLDS must be installed in each baghouse compartment or cell.

Where multiple bag leak detectors are required, the system's instrumentation and alarm may be shared among detectors.

The permittee shall utilize approved QA/QC practices that are adequate to ensure continuing validity of data and proper performance of the bag leak detection systems.

**SECTION D. Source Level Plan Approval Requirements**

The permittee shall calibrate and check the accuracy of the bag leak detection systems taking into account manufacturer's specifications at least annually.

An initial performance evaluation of the required bag leak detection systems will be required. The data collected from the bag leak detection systems during the initial performance test (Method 9) shall be used to provide a reasonable assurance of ongoing compliance.

Once the bag leak detection systems have been installed, calibrated and put into operation, the permittee shall utilize approved QA/QC practices that are adequate to ensure continuing validity of data and proper performance of the bag leak detection systems.

014 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

A visual inspection of the custom hood unit's interior (including ventilation uptake zones) for the degree of slag accumulation shall be performed weekly.

015 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

(a) The permittee shall monitor the pressure drop across the control device at least once daily, each day that the source and control device are in operation.

IV. RECORDKEEPING REQUIREMENTS.**# 016 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall maintain in a logbook (written or electronic) on-site and make it available upon request. The logbook shall record the following:

- (1) The permittee shall keep a throughput record of the tons of scrap cut on a monthly basis and consecutive 12-month rolling basis.
- (2) Triboelectric leak detection system (BLDS) status - daily defined as once per calendar day (when operating)
- (3) Bag (cartridge) replacement in baghouse
- (4) Any maintenance performed on baghouse
- (5) Copy of the manufacturer's recommended specifications and recommended maintenance schedule, if available
- (6) Keep records of any visible emissions and the corrective action taken
- (7) Keep results of each BLDS inspection, calibration, and validation check.
- (8) The results of the weekly visual inspection of the custom hood unit for slag accumulation.
- (9) Each slag removal operation, and details of what areas slag was removed from. The record shall include the time, date, name and signature of the person performing the removal
- (10) Pressure Differential - as measured by the magnehelic gauge or other approved Department approved device.

The visible emission observation records shall include the date, time, name and title of the observer, whether visible emissions were observed, and any corrective action.

[From Plan Approval 37-00377A]

V. REPORTING REQUIREMENTS.**# 017 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall submit monthly reports detailing the status of each action item below starting 30 days after the issuance of Plan Approval 37-00377B and continuing until the action items are completed. Additionally, the permittee shall submit notification when an action item is completed. The monthly reports/notifications shall be submitted through the Permitting Upload and Payment (PUP) system.

<https://greenport.pa.gov/ePermitPublicAccess/PublicSubmission/ValidatePublicSubmission>

1. The two-stage desiccant dryer installation.
2. The cutting door opening reduction work

**SECTION D. Source Level Plan Approval Requirements**

3. Splitter wall installation
4. Deflector(s) installation
5. New 20,000 ACFM baghouse installation

VI. WORK PRACTICE REQUIREMENTS.**# 018 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

For each BLDS, the permittee shall initiate procedures to determine the cause of every alarm within 8 hours of the alarm.

The permittee must alleviate the cause of the alarm within 24 hours of the alarm by taking whatever corrective action(s) are necessary.

Corrective actions may include, but are not limited to the following:

- (i) Inspecting the fabric filter for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in PM emissions;
- (ii) Sealing off defective bags or filter media;
- (iii) Replacing defective bags or filter media or otherwise repairing the control device;
- (iv) Sealing off a defective fabric filter compartment;
- (v) Cleaning the BLDS probe or otherwise repairing the BLDS;

[From Plan Approval 37-00377A]

019 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall select filters for the baghouse that are capable of controlling ultra-fine particulate matter from welding/torch cutting emissions to assure compliance with a minimum average control efficiency of no less than 89% for 0.3-1.0 micron particulate unless approved by the Department.

These filters shall be spark and flame resistant.

Compliance with the 25 Pa. Code 123.13 particulate emission limit of 0.02 gr/dscf shall be demonstrated through filter vendor media performance guarantees and purchase records.

[From Plan Approval 37-00377A]

020 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The baghouse capture system shall be equipped with a spark arrestor to prevent control device malfunction.

[From Plan Approval 37-00377A]

021 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The baghouse capture system shall be operated all the times when the torch cutting operation is in progress.

[From Plan Approval 37-00377A]

022 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall keep on hand a supply of clean spare filter cartridges for maintenance and repair of the baghouse. These quantities shall be determined by the manufacturer's recommendations, if available, and/or good operating and maintenance practices.

The permittee shall maintain all monitoring equipment and stock parts necessary for routine repairs onsite.

**SECTION D. Source Level Plan Approval Requirements**

[From Plan Approval 37-00377A]

023 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

- (a) a two-stage desiccant dryer shall be installed on the compressed air supply line that serves both C101 and C101A within 30 days of issuance of the Plan Approval.
- (b) Each cutting station door opening shall be reduced to 60 square feet per opening within 90 days of issuance of the Plan Approval or as approved by the Department. This shall be accomplished by the installation of a fixed steel plate apron or barrier panel.
- (c) A splitter wall shall be installed between the two cutting station door openings to separate the cutting stations within 120 days of the Plan Approval issuance or as approved by the department. The splitter wall shall be fabricated from heavy-gauge steel plates or other steel as approved by the Department and extend from the floor to the ceiling.
- (d) Deflector panels shall be installed within the custom hood unit within 120 days of issuance of the Plan Approval or as approved by the Department.
- (e) In pursuit of unobstructed airflow through the custom hood unit, the permittee shall perform slag removal operations. The slag removal operations shall be performed on all parts of the custom hood unit monthly at a minimum or sooner as needed as determined by the performance of the control device(s) and visual inspections.
- (f) All cutting station doors shall be closed when no staging, positioning, removing, or cutting activity is occurring at that specific station.
- (g) The reverse pulse jet air pressure shall be maintained between 80 psig and 100 psig.

024 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

- (a) A magnehelic gauge or equivalent shall be maintained and operated to monitor the pressure differential across the baghouse. All gauges employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (+/- 2%) of full-scale reading.
- (b) The permittee shall adhere to the approved indicator range for the baghouse.
1. Pressure drop: as established by the facility and approved of by the Department.
 2. Within 24-hours of discovery of a reading outside of the prescribed range the permittee shall perform a maintenance inspection on the control device and take corrective action. In the event of more than one documented excursion outside the prescribed range in any calendar quarter the permittee shall submit a corrective measure plan to the Department

VII. ADDITIONAL REQUIREMENTS.**# 025 [25 Pa. Code §123.42]****Exceptions**

The limitations of 123.41 (relating to limitations) shall not apply to a visible emission in any of the following instances:

- (1) when the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (3) When the emission results from sources specified in 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions).

**SECTION D. Source Level Plan Approval Requirements**

(4) N/A

026 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) An initial removal of all slag from the custom hood unit's floor, walls, roof, sides, and ventilation areas shall be performed. Additionally, all slag from the ventilation uptake zones and the Drop Out Box shall be removed. The removal of all slag shall occur prior to the initial start up of the source after the issuance of Plan Approval 37-00377B.

(b) The baghouse capture system consists of the custom hood capture unit, C101, C101A, and all associated equipment with the system(s).

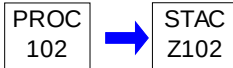
(c) The permittee shall perform an engineering evaluation on how to control the amount of flow to each baghouse and determine what devices will be used to accomplish the separated flows. This evaluation shall be submitted to the department for review and approval.

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 102

Source Name: MATERIAL HANDLING

Source Capacity/Throughput:

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.**# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Visible fugitive emissions from material handling shall be minimized through water sprays or equivalent wet suppression methods to ensure that fugitive particulate matter is minimized and does not go beyond the property line.

VII. ADDITIONAL REQUIREMENTS.

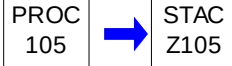
No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 105

Source Name: OUTDOOR CUTTING TORCH(ES) (1)

Source Capacity/Throughput:

**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §123.21]

General

(a) This section applies to sources except those subject to other provisions of this article, with respect to the control of sulfur compound emissions.

(b) No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.**Fuel Restriction(s).**

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Pipeline quality natural gas or equivalent (propane) in combination with oxygen shall be permitted for combustion in the torch(es).

Operation Hours Restriction(s).

005 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) The Outdoor Cutting Torch(es) shall only operate a maximum of 260 hours per year as a 12-month rolling total.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.

006 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) The supervisor/"designated observer" shall conduct an initial fugitive emission observation within the first five (5) minutes of outdoor cutting operations commencing.

(b) The supervisor/designated observer" shall conduct fugitive emission observations every fifteen (15) minutes during cutting sessions.

**SECTION D. Source Level Plan Approval Requirements****IV. RECORDKEEPING REQUIREMENTS.****# 007 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) The permittee shall maintain in a logbook (written or electronic) on-site and make it available upon request. The logbook shall record the following:

1. The Date, Time, and location of each outdoor cutting session
2. The name and signature of the supervisor/"designated observer" as well as the name and signature of the person performing the cutting
3. The Type of material being cut and the approximate quantity of the material.
4. The results of the "Pre-Cutting Assessment"
5. The date, time, and results of each fugitive emission observation performed
6. Any suspensions of cutting due to fugitives, or deviations from the plan.
7. The starting time and ending time of the outdoor cutting operation
8. The 12-month rolling total for the number of hours that the outdoor cutting operations has occurred.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.**# 008 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) The permittee shall only conduct outdoor torch cutting on uncoated, unpainted structural steel (I-beams, channels, angles, wide-flange sections), uncoated low-carbon ferrous scrap free of surface contaminants, and clean ferrous material free of oil, grease, or chemical contamination. If the material composition is unknown, the steel shall not be cut in the open yard.

(b) A maximum of 1 torch can be used at a time.

(c) Scrap pieces shall be positioned at all times so as to maintain an air gap between the ground and material being cut.

(d) All outdoor cutting operations shall occur in the pre-approved designated location and take place as far from the property boundaries as reasonably possible.

(e) Prior to each outdoor cutting session, the supervisor/"designated observer shall" shall perform a "Pre-Cutting Assessment". The "Pre-Cutting Assessment" shall review the following:

- Material verification (meets restrictions)
- Locational verification (inside designated outdoor cutting area)
- Wind direction and speed
- Atmospheric and meteorological conditions
- Perform a test cut on the material

(f) Yard cutting shall halt anytime fugitive emissions approaching the property line are noticed.

**SECTION D. Source Level Plan Approval Requirements****VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).



SECTION E. Source Group Plan Approval Restrictions.

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Plan Approval facility.

**SECTION G. Emission Restriction Summary.**

Source Id

Source Description

Site Emission Restriction Summary

Emission Limit	Pollutant
9.700 Tons/Yr	PM10
8.200 Tons/Yr	PM2.5
0.260 Tons/Yr	CO
0.020 Tons/Yr	VOC
0.310 Tons/Yr	NOX

**SECTION H. Miscellaneous.**

The authorized facility operations include the following activities that have been determined to be sources of minor significance for particulate matter emissions (1 tpy or less):

- Stockpiling
- Material Delivery by truck and rail
- Stockpiling
- Ball Drop
- Unpaved Roadways.

These activities are subject to the general fugitive particulate matter restrictions of 25 Pa. 123.2 and 123.3.



***** End of Report *****
