



# Air Quality Construction Permit

**Permit Number:** 14-A-521-S1

**Plant Number:** 78-01-043

**Company:** Alter Metal Recycling

**Contact Person:**  
Ryan Carpenter  
Environmental Manager

**Responsible Party:**  
Sarah Schlichtholz  
Dir. Environmental & Community Affairs

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2603 9<sup>th</sup> Avenue  
Council Bluffs, IA 51501

## Permitted Equipment

**Emission Point ID:** EP-1

**Emission Unit(s) and Control Equipment:**

EU ID	Description	Maximum Rated Capacity	Control Equipment Description and ID
EU-Hauling	Haul Roads	NA	Paved Road Sweeping w/ Water Suppression

**Equipment Location:** 2603 9<sup>th</sup> Avenue  
Council Bluffs, IA 51501

Issuance of this permit shall not relieve the owner or operator of the responsibility to comply fully with applicable provisions of the State Implementation Plan (SIP), and any other requirements of local, state, and federal law.

Project Number	Project Description	Stack Testing	Issuance Date
17-158	Reduce Silt Load Sampling	No	06/30/17

Under the Direction of the Director of the  
Department of Natural Resources

## PERMIT CONDITIONS

### 1. Emission Limits

The owner or operator is required to report all emissions as required by law, regardless of whether a specific emission limit has been established in this permit. The following emission limits shall not be exceeded:

Pollutant	lb/hr <sup>(1)</sup>	tons/yr <sup>(2)</sup>	Other Limits	Reference/Basis
Particulate Matter (PM) – State	NA	NA	NA	NA
Opacity	NA	NA	<sup>(3)</sup>	567 IAC 23.3(2)"c"
Lead (Pb)	NA	NA	<sup>(4)</sup>	NAAQS, RACT

<sup>(1)</sup> The emission limit is expressed as the average of three (3) runs.

<sup>(2)</sup> The emission limit is based on a twelve (12) month rolling total.

<sup>(3)</sup> The owner/operator shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond lot line of the property.

<sup>(4)</sup> The lead limit is established at 0.01 tons of lead per rolling 3-month average; that correlates to a lead silt content of 0.00281 g/m<sup>2</sup> and maximum potential operation (all raw material/product is shipped or received by truck). The lead limit is based on 95% reduction over baseline lead levels and is established to address the nonattainment designation for a portion of Pottawattamie County published in the Federal Register (76 FR 72097) on November 22, 2011. The compliance demonstration with this lead limit is based on maximum silt content, operating restrictions and work practice standards as specified in Condition 5. Total silt load content of 2.7 g/m<sup>2</sup> has been established as a surrogate for total lead silt content.

### 2. Compliance Demonstration(s)

**Compliance Demonstration Table**

Pollutant	Compliance Methodology	Frequency	Test Run Time	Test Method
PM – State	Silt Load Sampling	Quarterly	NA	As specified in Condition 5.B
Lead	None	NA	NA	NA

**If an initial stack test is specified in the "Compliance Demonstration Table,"** the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in this condition within the applicable time period specified below:

- Within sixty (60) days after achieving the maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment for the addition of new equipment or the physical modification of existing equipment or control equipment.
- Within ninety (90) days of the issuance of this permit if there is no physical modification to any emission units or control equipment.

**If any additional stack testing beyond an initial test (i.e. quarterly, semi-annual, annual, etc.) is required in "Compliance Demonstration Table,"** the owner or the owner's authorized agent shall demonstrate compliance with the emission limitations contained in this condition as specified in the "Compliance Demonstration Table." See Conditions 12.A.(4) and 12.B.(5) for notification and reporting requirements.

If stack testing is required, the owner or the owner's authorized agent shall use the test method and run time listed in the "Compliance Demonstration Table" unless another testing methodology is approved by the Department prior to testing.

Each emissions compliance test must be approved by the Department. Unless otherwise specified by the Department, each test shall consist of three (3) separate runs. The arithmetic mean of three (3) acceptable test runs shall apply for compliance, unless otherwise indicated by the Department.

Per 567 IAC 25.1(7)"a", at the Department's request, a pretest meeting shall be held not later than fifteen (15) days before the owner or operator conducts the compliance demonstration. A testing protocol shall be submitted to the Department no later than fifteen (15) days before the owner or operator conducts the compliance demonstration. Representatives from the Department shall attend this meeting, along with the owner and the testing firm, if any. It shall be the responsibility of the owner to coordinate and schedule the pretest meeting. A representative of the Department shall be allowed to witness the test(s). The Department shall reserve the right to impose additional, different, or more detailed testing requirements.

## 2. Compliance Demonstration(s) (Continued)

The owner shall be responsible for the installation and maintenance of test ports. The unit(s) being sampled shall be operated in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which this unit(s) will be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the Department that this unit(s) has been physically altered so that capacity cannot be exceeded, or the Department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the Department to determine whether this unit(s) is in compliance.

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## 3. Emission Point Characteristics

This emission point shall conform to the specifications listed below:

Parameter	Value
Stack Height (feet from the ground)	NA
Discharge Style	NA
Stack Outlet Dimensions (inches)	NA
Exhaust Temperature (°F)	NA
Exhaust Flowrate (scfm)	NA

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point characteristics above are different than the values stated, the owner or operator shall submit a request either by electronic mail or written correspondence to the Department within thirty (30) days of the discovery to determine if a permit amendment is required, or submit a permit application requesting to amend the permit.

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## 4. Federal Standards

### A. New Source Performance Standards (NSPS):

These emission units are not subject to any of the New Source Performance Standards (NSPS) at this time.

NOTE: The absence of the inclusion of any NSPS requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NSPS conditions.

### B. National Emission Standards for Hazardous Air Pollutants (NESHAP):

This equipment is not subject to any National Emission Standards for Hazardous Air Pollutants Standards at this time.

NOTE: The absence of the inclusion of any NESHAP requirements as part of this permit does not relieve the owner or operator from any obligation to comply with all applicable NESHAP conditions.

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## 5. Operating Requirements and Associated Recordkeeping

Unless specified by a federal regulation, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records shall be legible and maintained in an orderly manner.

Fugitive dust emissions generated from truck traffic on the paved haul roads shall, at a minimum, be controlled by:

- A. Sweeping, at a minimum, 3 times per week when the haul roads are used six (6) days in a week, with a maximum of one operating day (i.e., Sunday and holidays would not be considered operating days since there is no movement of material) between sweeping events except as noted in Conditions 5.A (i) through (iii). All sweeping must be completed using a Tymco DST-6 Sweeper or functionally equivalent sweeper type (as approved by the Department).
  - i. If sweeping cannot be accomplished because the ambient air temperature (as measured at the facility during daylight operating hours) will be less than 35° F (1.7° C) or conditions due to weather could create hazardous driving conditions, then the sweeping shall be postponed and accomplished as soon after the scheduled date as the conditions preventing the sweeping have abated.

**5. Operating Requirements and Associated Recordkeeping (Continued)**

- ii. Paved road sweeping need not occur when a rain gauge located at the site indicates that at least 0.2 inches of precipitation (water equivalent) has occurred within the preceding 24-hour time period. However, paved road sweeping shall resume within 24-hours after the precipitation event has ended.
  - iii. Paved road sweeping need not occur when the facility experiences no haul road traffic on that calendar day (i.e., the facility would not count this day towards the maximum of one day between sweeping).
  - iv. If sweeping cannot be accomplished for the entire month due to ambient temperatures or hazardous weather, silt load testing is not required for that month.
  - v. The facility shall record the frequency of cleaning/sweeping performed on the haul roads. If the roads are not cleaned due to weather, a written record must be kept on site outlining the conditions.
- B. The haul road surface silt loading shall not exceed 2.70 g/m<sup>2</sup>.
- i. Performance testing on the haul road surface silt loading shall be completed on a quarterly basis. For each performance test, silt loading sampling shall be done for at least 3 different locations. The three sampled locations shall then be averaged to determine the silt loading average results. Performance testing shall be completed prior to paved road sweeping. Silt load testing shall be conducted according to the procedures outlined in AP-42, Appendix C.1 Procedures for Sampling Surface/Bulk Dust Loading.
  - ii. The owner or operator shall maintain a log of each silt load sampling event that contains the following:
    - a) The date of silt load sampling event;
    - b) The location of the sample taken;
    - c) The measured silt content in grams;
    - d) Sample area used for silt load sampling in meters; and,
    - e) The operator's initials.
- C. Traffic on the haul roads shall not exceed 20 mph. The speed limit shall be posted on all haul roads.
- D. The facility is limited to shipping (inbound and outbound) material between the hours of 5 am to 8 pm, Monday through Friday and 8 am to 12 pm on Saturday.
- i. The facility shall record daily the date and time of material processed at the facility (i.e., record inbound and outbound shipments of process material).
  - ii. Internal transfers at the facility are limited to Monday through Friday.
- E. The facility is limited to processing/shipping (inbound and outbound) no more than 946,000 tons of material per rolling 12-month period.
- i. The facility shall monthly calculate and record the amount of material processed/shipped (inbound and outbound).
  - ii. The facility shall calculate and record the rolling 12-month total amount of material processed (in tons) on a monthly basis.
- F. Best Management Practices (BMP) – Clean up spills, truck scale areas, etc. Alter Metal shall implement “good housekeeping” or best management practices to minimize fugitive emissions. Such practices include but are not limited to:
- i. Clean up spills of raw materials or product on the haul road surface as expeditiously as possible and in a manner consistent with good practice for minimizing emissions.
  - ii. Clean on weekly basis, around truck scale areas and process buildings.
  - iii. Maintain and post speed limit signs.
  - iv. The facility shall maintain records of the BMP activities completed under Permit Condition 5.F.
- G. Limit public access. Alter Metal shall restrict public access to the facility by posting signs warning of restricted access to the facility at all property boundary lines not secured with fencing. During those days the facility is operating, in-person surveillance of the boundary shared with the rail line shall be conducted by Alter Metal staff periodically throughout the day, including documentation as to surveillance times and locations. In lieu of in-person surveillance the facility may maintain and operate equipment adequate to ensure surveillance of the boundary shared with the rail line during plant operations.

The restriction does not apply to Alter Metal employees, employees, owner or lessees of contiguous properties, federal, state or local officials, emergency and maintenance service personnel (both private and public section), who have a legitimate reason or need for accessing the rail spur.

- i. The facility shall record the date control measures restricting public access to the facility (posting signs, performing in-person surveillance and/or installing electronic surveillance, installing fences, etc.) are initiated.
- ii. The facility shall record the date, with documentation, for all subsequent surveillance times and locations.

## **5. Operating Requirements and Associated Recordkeeping (Continued)**

### **H. Contingency Measures**

- i. After November 30, 2014, the facility shall increase the frequency of cleaning/sweeping of the haul roads to daily within seven (7) days after notification by the Department that a monitored exceedance of the lead NAAQS occurred. The facility shall submit sweeping data to the Department and continue daily cleaning/sweeping until notified by the Department that a different cleaning/sweeping frequency shall be used.
  - ii. After November 30, 2014, the facility shall implement good housekeeping practices on paved haul road surfaces within seven (7) days after notification by the Department that a monitored exceedance of the lead NAAQS occurs during months in which the inclement weather provision as specified in condition 5.A.i applied. The good housekeeping practices shall include but are not limited to daily removal of material piles that have accumulated on haul road surfaces and decreasing vehicle speeds on paved road surfaces from 20 mph to 5 mph. The owner or operator shall continue good housekeeping practices on paved road surfaces until paved road sweeping resumes.
  - iii. If a monitored exceedance of the lead NAAQS occurs after the provisions of Permit Condition 5.H.i. have been implemented for three (3) full calendar months, Alter Metal will submit an emissions evaluation meeting the criteria and timeline specified by the Department.
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## **6. Continuous Emission Monitoring**

Continuous emission monitoring is not required by this permit at this time.

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## **7. Department Review**

This permit is issued under the authority of 567 Iowa Administrative Code (IAC) 22.3. The proposed equipment has been evaluated for conformance with Iowa Code Chapter 455B; 567 IAC Chapters 20 – 35; and 40 Code of Federal Regulations (CFR) Parts 51, 52, 60, 61, and 63 and has the potential to comply. This permit is issued based on information submitted by the applicant. Any misinformation, false statements or misrepresentations by the applicant or by the applicant's representative(s) shall cause this permit to be void.

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. The Department assumes no liability, directly or indirectly, for any loss due to damage to persons or property caused by, resulting from, or arising out of the design, installation, maintenance or operation of the proposed equipment.

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## **8. Owner and Operator Responsibility**

This permit is for the construction and operation of specific emission unit(s), control equipment, and emission point as described in this permit and in the application for this permit. The permit holder, owner, and operator of the facility shall assure that the installation of the equipment listed in this permit conforms to the design in the application (i.e. type, maximum rated capacity, etc.). No person shall construct, install, reconstruct or alter this emission unit(s), control equipment, or emission point without the required amended permit.

Any owner or operator of the specified emission unit(s), control equipment, or emission point, including any person who becomes an owner or operator subsequent to the date on which this permit is issued, is responsible for assuring that the installation, operation, and maintenance of the equipment listed in this permit is in compliance with the provisions of this permit and all other applicable requirements and that adequate operation and maintenance is provided to ensure that no condition of air pollution is created.

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## 9. Transferability

Unless the equipment is portable, this permit is not transferable from one location to another or from one piece of equipment to another. See Condition 12.A.(2) for notification requirements for relocating portable equipment (567 IAC 22.3(3)“f”).

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## 10. Construction

### A. General Requirements:

It is the owner's responsibility to ensure that construction conforms to the final plans and specifications as submitted.

In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. If a proposed project is not timely completed, the owner or operator shall seek a permit amendment in order to revert back to the most recent previous version of the permit. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

This permit or amendment shall become void if any one of the following conditions occurs:

- (1) the construction or implementation of the proposed project, as it affects the emission point permitted herein, is not initiated within eighteen (18) months after the permit issuance date; or
- (2) the construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within thirty-six (36) months after the permit issuance date; or
- (3) the construction or implementation of the proposed project, as it affects the emission point permitted herein, is not completed within a time period specified elsewhere in this permit.

### B. Changes to Plans and Specifications:

The owner or operator shall amend this permit or amendment prior to startup of the equipment if:

- (1) Any changes are made to the final plans and specifications submitted for the proposed project; or
- (2) This permit becomes void.

Changes to the final plans and specification shall include changes to plans and specifications for permitted equipment and control equipment and the specified operation thereof.

### C. Amended Permits:

The owner or operator may continue to act under the provisions of the previous permit for the affected emission unit(s) and emission point, together with any previous amendment to the permit, until one of the following conditions occurs:

- (1) The proposed project authorized by this amendment is completed as it affects the emission unit(s) and emission point permitted herein; or
  - (2) This current amendment becomes void.
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## 12. Notification, Reporting, and Recordkeeping

A. The owner or operator shall furnish the Department the following written notifications:

- (1) Per 567 IAC 22.3(3)"b":
  - (a) The date construction, installation, or alteration is initiated postmarked within thirty (30) days following initiation of construction, installation, or alteration.
  - (b) The actual date of startup, postmarked within fifteen (15) days following the start of operation.
- (2) Per 567 IAC 22.3(3)"f," when portable equipment for which a permit has been issued is to be transferred from one location to another, the Department shall be notified:
  - (a) At least fourteen (14) days before equipment relocation if the equipment will be located in a nonattainment area for the National Ambient Air Quality Standards (NAAQS) or a maintenance area for the NAAQS.
  - (b) At least seven (7) days before equipment relocation.
- (3) Per 567 IAC 22.3(8), a new owner shall notify the Department of the transfer of equipment ownership within thirty (30) days of the occurrence. The notification shall include the following information:
  - The date of ownership change; the name, address, and telephone number of the responsible official, the contact person, and the owner of the equipment both before and after the ownership change; and the construction permit number(s) of the equipment changing ownership.
- (4) Unless specified per a federal regulation, the owner or the owner's authorized agent shall notify the Department in writing not less than thirty (30) days before a required test or performance evaluation of a continuous emission monitor [567 IAC 25.1(7)]. The notification shall include:
  - I. The time; the place; the name of the person who will conduct the tests; and other information as required by the Department.

If the owner or operator does not provide timely notice to the Department, the Department shall not consider the test results or performance evaluation results to be a valid demonstration of compliance with the applicable rules or permit conditions. Upon written request, the Department may allow a notification period of less than thirty (30) days.

B. The owner or operator shall furnish the Department with the following reports:

- (1) Per 567 IAC 24.1(2), an incident of excess emissions as defined in 567 IAC 20.2 shall be reported within eight (8) hours or at the start of the first working day following the onset of the incident. The report may be made by electronic mail, in person or by telephone.
- (2) Per 567 IAC 24.1(3), a written report of an incident of excess emissions as defined in 567 IAC 20.2 shall be submitted as a follow-up to all required initial reports to the Department within seven (7) days of the onset of the upset condition.
- (3) Operation of this emission unit(s) or control equipment outside of those operating parameters specified in Permit Condition 5 in accordance to the schedule set forth in 567 IAC 24.1.
- (4) Per 567 IAC 25.1(6), the owner or operator of any facility required to install a continuous monitoring system or systems shall provide quarterly reports to the Director, no later than thirty (30) calendar days following the end of the calendar quarter, on forms provided by the Director.
- (5) Per 567 IAC 25.1(7), a written compliance demonstration report for each compliance testing event, whether successful or not, postmarked not later than six (6) weeks after the completion of the test period unless other regulations provide for other notification requirements. In that case, the more stringent reporting requirement shall be met.

C. All data, records, reports, documentation, construction plans, and calculations required under this permit shall be available at the plant during normal business hours for inspection and copying by federal, state, or local air pollution regulatory agencies and their authorized representatives, for a minimum of two (2) years from the date of recording unless otherwise required by another applicable law (i.e. NSPS, NESHAP, etc.)

D. Information regarding this permit should be sent to the attention of the following individuals based on the type of information being submitted: change in ownership (Air Quality Bureau Records Center), permit correspondence (Construction Permit Supervisor), stack testing correspondence (Stack Test Coordinator), and reports and notifications (Compliance Unit Supervisor and DNR Field Office). The addresses are:

Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite 1 Windsor Heights, IA 50324 Telephone: (515) 725-9549 Fax: (515) 725-9502	IDNR Field Office 4 1401 Sunnyside Lane Atlantic, IA 50022 Telephone: (712) 243-1934 Fax: (712) 243-6251
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### 13. Appeal Rights

All conditions within an original permit may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. Amended conditions within a permit amendment may be appealed, subject to the appeal rights set forth in 561 IAC Chapter 7. In permit amendments, all provisions of the original permit remain in full force and effect unless they are specifically changed by the permit amendment. The previous, unchanged permit provisions are included in the amendment for your convenience only and are unappealable.

### 14. Permit History

Permit No.	Project No.	Description	Date	Stack Testing
14-A-521	14-126	Original Permit (SIP)	09/02/14	No

**END OF PERMIT**