Buffalo Shredding & Recovery

3172 Lakeshore Road
Blasdell, NY 14219
Phone: (716) 823-2631

March 21, 2025

Lisa Porter Czechowicz
Regional Permit Administrator
New York State Department of Environmental Conservation - Region 9
270 Michigan Ave.
Buffalo, NY 14203-2915

Re: Air State Facility Permit Application - Buffalo Shredding & Recovery, LLC / DEC ID: 9-1448-00419 / File: 1940109897

Dear Lisa:

On behalf of Buffalo Shredding & Recovery, LLC (Buffalo Shredding), Ramboll Americas Engineering Solutions, Inc. (Ramboll) is pleased to provide the New York State Department of Environmental Conservation (NYSDEC) with the enclosed Air State Facility (ASF) permit application for the Buffalo Shredding facility located in the Village of Blasdell, Erie County, New York. The facility currently operates under an Air Facility Registration (AFR) DEC ID 9-1448-00419 issued on 11/20/2017.

This application is being submitted in response to the Administrative Compliance Order of Consent U.S. EPA Docket No. CAA-02-2024-1211 issued by the United States Environmental Protection Agency (USEPA) on June 8, 2023, and signed on January 22, 2025. The application follows the limitations and conditions, specified in the Consent Order, to limit the facility's potential to emit volatile organic compounds to less than 50 tons per year (tpy).

The following ASF application has been developed in accordance with that consent order and includes the following attachments:

- Attachment A - ASF Permit application forms
- Attachment B - Facility Location Map
- Attachment C - Emission Unit Matrix that provides processes, emission sources, emission points, and air pollution control devices
- Attachment D - Process Flow Diagram
- Attachment E-Emission Inventory (Tables El-E7)
- Attachment F - Regulatory Discussion (including an evaluation of Part 212 air toxics requirements)
- Attachment G - Climate Leadership and Community Protection Act
- Attachment H - Long Environmental Assessment Form ***(to be provided under separate cover)***
- Attachment I - Public Participation Plan ***(to be provided under separate cover)***
- Attachment J - Consent Order
- Attachment K - Best Management Practices (BMP) Plan

If you have any questions or comments about the attached information or have additional information requirements, please feel free to contact me directly by phone at (412) 771-7000 ext. 5033, or by email at gwehrli@metalico.com.

Yours Sincerely,

Glenda Wehrli
Director of Environmental Compliance and Employee Safety

Enclosures: ASF Permit Application

cc: Robert Buettner, Chief- USEPA (via email)
Cheryl Webster, P E - NYSDEC (via email)
Tom Samarco - Ramboll
Jack Sumski - Ramboll
Matthew Traister, PE - Ramboll
CherylAnn Whitmore, PE - Ramboll

Attachment A

ASF Permit Application Forms

New York State Department of Environmental Conservation
Air Permit Application

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

DEC ID	Application ID	Application Type
9-1448-00419	9-1448-00419/00001	☒ State Facility ☐ Title V

Section I - Certification

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information required to complete this application, I believe the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Responsible Official Glenda Wehrli	Title Director of Environmental Compliance & Employee Safety
Signature [signature]	Date 3/21/2025

Professional Engineer Certification

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments as they pertain to the practice of engineering. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Professional Engineer Matthew Traister	NYS License No. 068979
Signature [signature]	Date 3/21/2025

Section II - Identification Information

Type of Permit Action Requested

☒ New ☐ Renewal ☐ Significant Modification ☐ Administrative Amendment ☐ Minor Modification

☐ Application for the construction of a new facility ☐ Application involves the construction of new emission unit(s)

Facility Information

Name: Buffalo Shredding and Recovery, LLC

Location Address: 3175 Lakeshore Road

☒ City / ☐ Town / ☐ Blasdell | Zip 14219

Owner/Firm Information

Business Taxpayer ID: 45244931 6

Name: Buffalo Shredding and Recovery, LLC

Street Address: 3175 Lakeshore Road

City: Blasdell	State/Province: New York	Country: USA	Zip: 14219

Owner Classification: ☐ Federal ☐ State ☐ Municipal ☒ Corporation/Partnership ☐ Individual

Owner/Firm Contact Information

Name Glenda Wehrli	Phone (412) 771-7000 ext 5033
E-mail Address gwehrli@metalico.com	Fax ( )
Affiliation Buffalo Shredding and Recovery, LLC	Title Director of Environmental Compliance & Employee Safety

Street Address: 3175 Lakeshore Road

City: Blasdell	State/Province: New York	Country: USA	Zip: 14219

Facility Contact Information

Name Glenda Wehrli	Phone (412) 771-7000 ext 5033
E-mail Address gwehrli@metalico.com	Fax ( )
Affiliation Buffalo Shredding and Recovery, LLC	Title Director of Environmental Compliance & Employee Safety

Street Address: 3175 Lakeshore Road

City: Blasdell	State/Province: New York	Country: USA	Zip: 14219

DEC ID
9-14480-00419

Project Description ☒ Continuation Sheet(s)

The United States Environmental Protection Agency (USEPA) Region 2 issued a consent order (U.S. EPA Docket No. CAA-02-2024-1211) to Buffalo Shredding & Recovery, LLC. Buffalo Shredding must submit an Air State Facility permit application to NYSDEC and USEPA within sixty (60) days of the effective date of Buffalo Shredding's Consent Agreement and Final Order. The following ASF application has been developed in accordance with that consent order.

Section III - Facility Information

Facility Classification

☐ Hospital ☐ Residential ☐ Educational/Institutional ☐ Commercial ☒ Industrial ☐ Utility

Affected States (Title V Applications Only)

☐ Vermont ☐ Massachusetts ☐ Rhode Island ☐ Pennsylvania Tribal Land: _____

☐ New Hampshire ☐ Connecticut ☐ New Jersey ☐ Ohio Tribal Land: _____

SIC Code(s)			NAICS Code(s)			
5093			423930			

Facility Description ☒ Continuation Sheet(s)

The Buffalo Shredding & Recovery facility processes and separates large scrap metal articles (junk cars, large appliances and other materials) for recovery and recycling of both ferrous and non-ferrous metals for sale to their customers. The primary operations at the facility consist of a enclosed hammermill driven by an electric motor. With the exception of the inlet for raw material feed and outlets for processed material, the hammermill is fully enclosed. The hammerill is equipped with a water spray injection system that directs water onto the

Compliance Statements (Title V Permit Applications Only)

I certify that as of the date of this application the facility is in compliance with all applicable requirements. ☐ Yes ☐ No

If one or more emission units at the facility are not in compliance with all applicable requirements at the time of signing this application (the 'NO' box must be checked), the noncomplying units must be identified in the "Compliance Plan" block on page 8 of this form along with the compliance plan information required. For all emission units at the facility that are operating in compliance with all applicable requirements, complete the following:

☐ This facility will continue to be operated and maintained in such a manner as to assure compliance for the duration of the permit, except those emission units referenced in the compliance plan portion of this application.

☐ For all emission units subject to any applicable requirements that will become effective during the term of the permit, this facility will meet such requirements on a timely basis.

☐ Compliance certification reports will be submitted at least once per year. Each report will certify compliance status with respect to each applicable requirement, and the method used to determine the status.

Facility Applicable Federal Requirements ☒ Continuation Sheet(s)

Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
6	NYCRR	200		5					
6	NYCRR	200		6					
6	NYCRR	200		7					
6	NYCRR	201	1	2					

Facility State Only Requirements ☐ Continuation Sheet(s)

Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
6	NYCRR	201	5						

Section III - Facility Information

Facility Description (continuation)

material inside the shredder. This system, combined with a cyclone separator, comprise the dust mitgation controls on the shredder. Emissions resulting from the shredding process are fugitive in nature and consist of particulate matter and steam generated from the heating of the injection water during the shredding process.

The output from the shredder consists of a mixed metal stream (ferrous and non-ferrous) that is subsequently processed/separated further by metal composition and a separate waste stream or "shredder fluff" that consists of the non-metallic waste (plastics, foam, etc.) that is segregated for disposal.

New York State Department of Environmental Conservation
Air Permit Application Form

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

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Section III - Facility Information

Facility Applicable Federal Requirements (continuation)

Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
6	NYCRR	201	1	7					
6	NYCRR	201	1	8					
6	NYCRR	201	3	2	a				
6	NYCRR	201	3	3	a				
6	NYCRR	202	1	1					
6	NYCRR	215		2					
40	CFR	70		6	b				

Continuation Sheet __1__ of __1__

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NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

Facility Compliance Certification Method ☒ Continuation Sheet(s)

Rule Citation

Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
6	NYCRR	201	7	1					

☒ Applicable Federal Requirement ☐ State Only Requirement	☒ Capping	CAS Number	Contaminant Name
		0NY998 - 00 - 0	Total Volatile Organic Compounds

Monitoring Type

☒ Work Practice Involving Specific Operations ☐ Ambient Air Monitoring ☐ Record Keeping/Maintenance Procedures
☐ Intermittent Emission Testing ☐ Continuous Emissions Monitoring ☐ Monitoring of Process or Control Device Parameters

Compliance Activity Description

In accordance with EPA consent order (U.S. EPA Docket No. CAA-02-2024-1211), VOC emissions must be limited to 49.9 tons per year based on a 12-month rolling total basis. VOC emissions will be calculated based on throughput and a VOC emission factor of 0.39 pounds of VOC (measured as propane) per gross ton of shredder feed (lbs VOC/gross ton) .

Work Practice Type	Process Material		Reference Test Method
	Code	Description	
03	125	VOCs	EPA Method 25

Monitored Parameter		Manufacturer's Name/Model Number
Code	Description	

Limit		Limit Units	
Upper	Lower	Code	Description
49.9		38	tons per year

Averaging Method		Monitoring Frequency		Reporting Requirements	
Code	Description	Code	Description	Code	Description
17	Annual Maximum Rolled Monthly	05	Monthly	15	Annually

Facility Emissions Summary ☒ Continuation Sheet(s)

CAS Number	Contaminant Name	Potential to Emit (tons/yr)	Actual Emissions (tons/yr)
0NY075 - 00 - 5	PM-10	35	
0NY750 - 02 - 5	PM-2.5	25	
007446 - 09 - 5	Sulfur Dioxide	1.2	
0NY210 - 00 - 0	Oxides of Nitrogen	0.18	
000630 - 08 - 0	Carbon Monoxide	2.3E-02	
007439 - 92 - 1	Lead (elemental)	9.7E-04	
0NY998 - 00 - 0	Total Volatile Organic Compounds	48	
0NY100 - 00 - 0	Total Hazardous Air Pollutants	0.17	
0NY750 - 00 - 0	Carbon Dioxide Equivalents		
00067-64-1	Acetone	1.7E-03	
00071-43-2	Benzene	5.0E-02	
00071-55-6	1,1,1 - Trichloroethane	2.5E-02	
00075-09-2	Methylene Chloride	7.4E-03	

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Section III - Facility Information

Facility Compliance Certification (continuation)

Rule Citation

Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
6	NYCRR	201	1	7					

		CAS No.	Contaminant Name
☒ Applicable Federal Requirement ☐ State Only Requirement	☒ Capping	0NY998 - 00 - 0	Total Volatile Organic Compounds

Monitoring Information

☐ Continuous Emission Monitoring
☐ Intermittent Emission Testing
☐ Ambient Air Monitoring
☐ Monitoring of Process or Control Device Parameters as a Surrogate
☒ Work Practice Involving Specific Operations
☐ Record Keeping/Maintenance Procedures

Description

In accorance with EPA consent order (U.S. EPA Docket No. CAA-02-2024-1211), the shredder is limited to 247,500 gross tons per year of shredder feed, calculated on a a 12-month rolling total basis, such that the Facility's potential to emit remains below 50 tons per year of VOCs when including the shredder and all other VOC emitting sources located at the Facility.

Work Practice	Process Material		Reference Test Method
Type	Code	Description	
03	179	Scrap	

Parameter		Manufacturer Name/Model No.
Code	Description	

Limit		Limit Units	
Upper	Lower	Code	Description
247,500		38	tons per year

Averaging Method		Monitoring Frequency		Reporting Requirements	
Code	Description	Code	Description	Code	Description
17	Annual Maximum Rolled Monthly	05	Monthly	15	Annually

Continuation Sheet 1 of 3

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Section III - Facility Information

Facility Compliance Certification (continuation)

Rule Citation

Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
6	NYCRR	201	1	7					

		CAS No.	Contaminant Name
☒ Applicable Federal Requirement ☐ State Only Requirement	☒ Capping	0NY998 - 00 - 0	Total Volatile Organic Compounds

Monitoring Information

☐ Continuous Emission Monitoring
☐ Intermittent Emission Testing
☐ Ambient Air Monitoring
☐ Monitoring of Process or Control Device Parameters as a Surrogate
☒ Work Practice Involving Specific Operations
☐ Record Keeping/Maintenance Procedures

Description

In accordance with EPA consent order (U.S. EPA Docket No. CAA-02-2024-1211), the shredder is limited to a maximum of 20,625 gross tons per month of shredder feed. Daily throughput records and hours of operation will be maintained and throughput will be calculated monthly.

Work Practice	Process Material		Reference Test Method
Type	Code	Description	
03	179	Scrap	

Parameter		Manufacturer Name/Model No.
Code	Description	

Limit		Limit Units	
Upper	Lower	Code	Description
20,625			Tons per Month

Averaging Method		Monitoring Frequency		Reporting Requirements	
Code	Description	Code	Description	Code	Description
60	maximum - not to exceed stated value - see monitoring description	05	Monthly	15	Annually

Continuation Sheet __2__ of __3__

New York State Department of Environmental Conservation
Air Permit Application Form

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Section III - Facility Information

Facility Compliance Certification (continuation)

Rule Citation

Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
6	NYCRR	201	1	7					

		CAS No.	Contaminant Name
☒ Applicable Federal Requirement ☐ State Only Requirement	☒ Capping	0NY998 - 00 - 0	Total Volatile Organic Compounds

Monitoring Information

☐ Continuous Emission Monitoring	☐ Monitoring of Process or Control Device Parameters as a Surrogate
☐ Intermittent Emission Testing	☐ Work Practice Involving Specific Operations
☐ Ambient Air Monitoring	☒ Record Keeping/Maintenance Procedures

Description

The facility will operate in accordance with a Best Management Plan (BMP) approved by the Department. At a minimum, this BMP should include elements to address fire prevention, visible emissions reductions and hazard reductions.

Work Practice	Process Material		Reference Test Method
Type	Code	Description	

Parameter		Manufacturer Name/Model No.
Code	Description	

Limit		Limit Units	
Upper	Lower	Code	Description

Averaging Method		Monitoring Frequency		Reporting Requirements	
Code	Description	Code	Description	Code	Description
		14	As required see monitoring description	16	As required see monitoring description

Continuation Sheet __3__ of __3__

Section III - Facility Information

Facility Emissions Summary (continuation)

CAS Number	Contaminant Name	Potential to Emit (tons/yr)	Actual (lbs/yr)
00075-35-4	1,1-Dichloroethene	1.7E-03	
00078-93-3	Methyl Ethyl Ketone	6.6E-04	
00079-01-6	Trichloroethene	8.3E-03	
00095-47-6	O-Xylene	8.3E-03	
00100-41-4	Ethylbenzene	8.3E-03	
00100-42-5	Styrene	1.7E-03	
00108-88-3	Toluene	4.1E-02	
00127-18-4	Tetrachloroethene	3.3E-04	
07740-43-9	Cadmium	1.4E-04	
007440-47-3	Chromium	1.6E-04	
179601-23-1	M-/P-Xylene	1.7E-02	

Continuation Sheet __1__ of __1__

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Section IV - Emission Unit Information

Emission Unit Description

☐ Continuation Sheet(s)

Emission Unit: 1-CLBRN

This emission unit consists of the Clean Burn Unit / Air Atomizing Multi-Oil Burner which fires used oil. The burner is rated at 350,000 Btu/hr.

Building Information

☐ Continuation Sheet(s)

Building ID	Building Name	Length (ft)	Width (ft)	Orientation
Main	Main Building			

Emission Unit Emissions Summary

Emission Unit: -

☐ Continuation Sheet(s)

CAS Number	Contaminant Name			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
CAS Number	Contaminant Name			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
CAS Number	Contaminant Name			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
CAS Number	Contaminant Name			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)

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Emission Unit	1-CLBRN	**Emission Point Information**			☐ Continuation Sheet(s)	
Emission Point	CLBRN					
Ground Elevation (ft)	Height (ft)	Height Above Structure (ft)	Inside Diameter (in)	Exit Temp. (°F)	Cross Section	
					Length (in)	Width (in)
591	TBD	TBD	8	TBD		
Exit Velocity (FPS)	Exit Flow (ACFM)	NYTM (E) (KM)	NYTM (N) (KM)	Building	Distance to Property Line (ft)	Date of Removal
TBD	TBD			Main		
Emission Point						
Ground Elevation (ft)	Height (ft)	Height Above Structure (ft)	Inside Diameter (in)	Exit Temp. (°F)	Cross Section	
					Length (in)	Width (in)
Exit Velocity (FPS)	Exit Flow (ACFM)	NYTM (E) (KM)	NYTM (N) (KM)	Building	Distance to Property Line (ft)	Date of Removal
Emission Point						
Ground Elevation (ft)	Height (ft)	Height Above Structure (ft)	Inside Diameter (in)	Exit Temp. (°F)	Cross Section	
					Length (in)	Width (in)
Exit Velocity (FPS)	Exit Flow (ACFM)	NYTM (E) (KM)	NYTM (N) (KM)	Building	Distance to Property Line (ft)	Date of Removal

Emission Unit	1-CLBRN	**Emission Source/Control Information**			☐ Continuation Sheet(s)		
Emission Source ID	Type	Date of Construction	Date of Operation	Date of Removal	Control Type Code	Control Type Description	Manufacturer's Name/Model Number
C0001	C						Clean Burn Unit #1
Design Capacity	Design Capacity Units Code	Design Capacity Units Description			Waste Feed Code	Waste Feed Description	Waste Type Code / Description
Emission Source ID	Type	Date of Construction	Date of Operation	Date of Removal	Control Type Code	Control Type Description	Manufacturer's Name/Model Number
Design Capacity	Design Capacity Units Code	Design Capacity Units Description			Waste Feed Code	Waste Feed Description	Waste Type Code / Description
Emission Source ID	Type	Date of Construction	Date of Operation	Date of Removal	Control Type Code	Control Type Description	Manufacturer's Name/Model Number
Design Capacity	Design Capacity Units Code	Design Capacity Units Description			Waste Feed Code	Waste Feed Description	Waste Type Code / Description

DEC ID
9-1448-00419

Process Information

☐ Continuation Sheet(s)

Emission Unit	1-CLBRN	Process	C01

Process Description

Clean Burn Unit / Air Atomizing Multi-Oil Burner which fires used oil. The burner is rated at 350,000 Btu/hr. The unit serves as building heat for the main building.

Source Classification Code (SCC)	Total Throughput		Throughput Quantity Units	
	Quantity/Hr	Quantity/Yr	Code	Description

☐ Confidential
☐ Operating at Maximum Capacity

Operating Schedule		Building	Floor/Location
Hours/Day	Days/Year		

Emission Point Identifier(s)

CLBRN						

Emission Source/Control Identifier(s)

C0001						

Emission Unit	-	Process	

Process Description

Source Classification Code (SCC)	Total Throughput		Throughput Quantity Units	
	Quantity/Hr	Quantity/Yr	Code	Description

☐ Confidential
☐ Operating at Maximum Capacity

Operating Schedule		Building	Floor/Location
Hours/Day	Days/Year		

Emission Point Identifier(s)

Emission Source/Control Identifier(s)

DEC ID
9-1448-00419

Emission Unit	Emission Point	Process	Emission Source	Emission Unit Applicable Federal Requirements							☐ Continuation Sheet(s)		
				Title	Type	Part	Subpart	Section	Subdiv.	Parag.	Subparag.	Cl.	Subcl.
1-CLBRN				6	NYCRR	225							
1-CLBRN				6	NYCRR	227	1						

Emission Unit	Emission Point	Process	Emission Source	Emission Unit State Only Requirements							☐ Continuation Sheet(s)		
				Title	Type	Part	Subpart	Section	Subdiv.	Parag.	Subparag.	Cl.	Subcl.

Emission Unit Compliance Certification ☐ Continuation Sheet(s)

Rule Citation

Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause

☐ Applicable Federal Requirement ☐ State Only Requirement ☐ Capping

Emission Unit	Emission Point	Process	Emission Source	CAS Number	Contaminant Name

Monitoring Information

☐ Continuous Emission Monitoring
☐ Intermittent Emission Testing
☐ Ambient Air Monitoring
☐ Monitoring of a Process or Control Device Parameters as a Surrogate
☐ Work Practice Involving Specific Operations
☐ Record Keeping/Maintenance Procedures

Compliance Activity Description

Work Practice Type	Process Material		Reference Test Method
	Code	Description	

Monitored Parameter		Manufacturer's Name/Model Number
Code	Description	

Limit		Limit Units	
Upper	Lower	Code	Description

Averaging Method		Monitoring Frequency		Reporting Requirements	
Code	Description	Code	Description	Code	Description

New York State of Opportunity | Department of Environmental Conservation

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9 - 1 4 4 8 - 0 0 4 1 9

Section IV - Emission Unit Information

Emission Unit Description ☐ Continuation Sheet(s)
Emission Unit: 1 - S H R E D
This emission unit consists of various operations assoicated with the scrap metal processor. The scrap metal processor is capable of processing 150 short tons of material per hour.

Building Information ☐ Continuation Sheet(s)

Building ID	Building Name	Length (ft)	Width (ft)	Orientation
Main	Main Building			

Emission Unit: -

Emission Unit Emissions Summary ☐ Continuation Sheet(s)

CAS Number	Contaminant Name			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
CAS Number	Contaminant Name			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
CAS Number	Contaminant Name			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
CAS Number	Contaminant Name			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)

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Emission Unit	1-SHRED	**Emission Point Information**			☐ Continuation Sheet(s)	
Emission Point	ZBOX1					
Ground Elevation (ft)	Height (ft)	Height Above Structure (ft)	Inside Diameter (in)	Exit Temp. (°F)	Cross Section Length (in)	Cross Section Width (in)
591	66	3	30	92		
Exit Velocity (FPS)	Exit Flow (ACFM)	NYTM (E) (KM)	NYTM (N) (KM)	Building	Distance to Property Line (ft)	Date of Removal
37	10897	676,345.75	4,740,867.29	Main		
Emission Point	JBOX1					
Ground Elevation (ft)	Height (ft)	Height Above Structure (ft)	Inside Diameter (in)	Exit Temp. (°F)	Cross Section Length (in)	Cross Section Width (in)
591	83	20	30	92		
Exit Velocity (FPS)	Exit Flow (ACFM)	NYTM (E) (KM)	NYTM (N) (KM)	Building	Distance to Property Line (ft)	Date of Removal
37	10897	676,492.24	4,740,870.77	Main		
Emission Point	FSHRD					
Ground Elevation (ft)	Height (ft)	Height Above Structure (ft)	Inside Diameter (in)	Exit Temp. (°F)	Cross Section Length (in)	Cross Section Width (in)
Fugitive						
Exit Velocity (FPS)	Exit Flow (ACFM)	NYTM (E) (KM)	NYTM (N) (KM)	Building	Distance to Property Line (ft)	Date of Removal
Fugitive						

Emission Unit	1-SHRED	**Emission Source/Control Information**			☒ Continuation Sheet(s)		
Emission Source ID	Type	Date of Construction	Date of Operation	Date of Removal	Control Type Code	Control Type Description	Manufacturer's Name/Model Number
00001	I	8/23/2011	2/14/2012				Mixed Transfer Points
Design Capacity	Design Capacity Units Code	Design Capacity Units Description			Waste Feed Code	Waste Feed Description	Waste Type Code / Description
Emission Source ID	Type	Date of Construction	Date of Operation	Date of Removal	Control Type Code	Control Type Description	Manufacturer's Name/Model Number
00002	I	8/23/2011	2/14/2012				Ferrous Transfer Points
Design Capacity	Design Capacity Units Code	Design Capacity Units Description			Waste Feed Code	Waste Feed Description	Waste Type Code / Description
Emission Source ID	Type	Date of Construction	Date of Operation	Date of Removal	Control Type Code	Control Type Description	Manufacturer's Name/Model Number
00003							Non-Ferrous Transfer Points
Design Capacity	Design Capacity Units Code	Design Capacity Units Description			Waste Feed Code	Waste Feed Description	Waste Type Code / Description

Department of Environmental Conservation

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Section IV - Emission Unit Information

Emission Source/Control (continuation)

Emission Unit: 1-SHRED

Emission Source ID	Emission Source Type	Date of Construction	Date of Operation	Date of Removal	Control Type Code	Control Type Description	Manufacturer's Name/Model No.
00004	I						Shredder w/ Water Inj

Design Capacity	Design Capacity Units Code	Design Capacity Units Description	Waste Feed Code	Waste Feed Description	Waste Type Code	Waste Type Description

Emission Source ID	Emission Source Type	Date of Construction	Date of Operation	Date of Removal	Control Type Code	Control Type Description	Manufacturer's Name/Model No.
00005	I						Z-Box

Design Capacity	Design Capacity Units Code	Design Capacity Units Description	Waste Feed Code	Waste Feed Description	Waste Type Code	Waste Type Description

Emission Source ID	Emission Source Type	Date of Construction	Date of Operation	Date of Removal	Control Type Code	Control Type Description	Manufacturer's Name/Model No.
00006							J-Box

Design Capacity	Design Capacity Units Code	Design Capacity Units Description	Waste Feed Code	Waste Feed Description	Waste Type Code	Waste Type Description

Emission Source ID	Emission Source Type	Date of Construction	Date of Operation	Date of Removal	Control Type Code	Control Type Description	Manufacturer's Name/Model No.

Design Capacity	Design Capacity Units Code	Design Capacity Units Description	Waste Feed Code	Waste Feed Description	Waste Type Code	Waste Type Description

Emission Source ID	Emission Source Type	Date of Construction	Date of Operation	Date of Removal	Control Type Code	Control Type Description	Manufacturer's Name/Model No.

Design Capacity	Design Capacity Units Code	Design Capacity Units Description	Waste Feed Code	Waste Feed Description	Waste Type Code	Waste Type Description

Emission Source ID	Emission Source Type	Date of Construction	Date of Operation	Date of Removal	Control Type Code	Control Type Description	Manufacturer's Name/Model No.

Design Capacity	Design Capacity Units Code	Design Capacity Units Description	Waste Feed Code	Waste Feed Description	Waste Type Code	Waste Type Description

Continuation Sheet 1 of 1

New York State Department of Environmental Conservation
Air Permit Application

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

DEC ID
9-1448-00419

Process Information ☐ Continuation Sheet(s)

Emission Unit	1-SHRED	Process	P01

Process Description

Various operations assoicated with the scrap metal processor including shredders, conveyors, and loading/unloading activities.

Source Classification Code (SCC)	Total Throughput		Throughput Quantity Units	
	Quantity/Hr	Quantity/Yr	Code	Description

☐ Confidential ☐ Operating at Maximum Capacity	Operating Schedule		Building	Floor/Location
	Hours/Day	Days/Year		

Emission Point Identifier(s)

ZBOX1	JBOX1	FSHRD				

Emission Source/Control Identifier(s)

00001	00002	00003	00005	00006		

Emission Unit	-	Process	

Process Description

Source Classification Code (SCC)	Total Throughput		Throughput Quantity Units	
	Quantity/Hr	Quantity/Yr	Code	Description

☐ Confidential ☐ Operating at Maximum Capacity	Operating Schedule		Building	Floor/Location
	Hours/Day	Days/Year		

Emission Point Identifier(s)

Emission Source/Control Identifier(s)

DEC ID
9-144-8-004-19

Emission Unit	Emission Point	Process	Emission Source	Emission Unit Applicable Federal Requirements							☐ Continuation Sheet(s)		
				Title	Type	Part	Subpart	Section	Subdiv.	Parag.	Subparag.	Cl.	Subcl.
1-SHRED		P01		6	NYCRR	212	1						
1-SHRED		P01		6	NYCRR	212	2						

Emission Unit	Emission Point	Process	Emission Source	Emission Unit State Only Requirements							☐ Continuation Sheet(s)		
				Title	Type	Part	Subpart	Section	Subdiv.	Parag.	Subparag.	Cl.	Subcl.

Emission Unit Compliance Certification ☐ Continuation Sheet(s)

Rule Citation

Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause
6	NYCRR	212	3	1	a				

☐ Applicable Federal Requirement ☐ State Only Requirement ☐ Capping

Emission Unit	Emission Point	Process	Emission Source	CAS Number	Contaminant Name
1-SHRED		P01	00004	0NY998 - 00 - 0	Volatile Organic Compounds

Monitoring Information

☐ Continuous Emission Monitoring
☐ Intermittent Emission Testing
☐ Ambient Air Monitoring
☐ Monitoring of a Process or Control Device Parameters as a Surrogate
☐ Work Practice Involving Specific Operations
☒ Record Keeping/Maintenance Procedures

Compliance Activity Description

Compliance with a maximum 12-month throughput rate of 247,500 gross tons per year of shredder feed, calculated on a 12-month rolling average basis, such that the Facility's potential to emit remains below 50 tons per year of VOCs when including the shredder and all other VOC emitting sources located at the Facility

Work Practice Type	Process Material		Reference Test Method
	Code	Description	

Monitored Parameter		Manufacturer's Name/Model Number
Code	Description	

Limit		Limit Units	
Upper	Lower	Code	Description

Averaging Method		Monitoring Frequency		Reporting Requirements	
Code	Description	Code	Description	Code	Description
		5	Monthly	15	Annually

New York State Department of Environmental Conservation

DEC ID
9 - 1 4 4 8 - 0 0 4 1 9

Section IV - Emission Unit Information

Emission Unit Description	☐ Continuation Sheet(s)
Emission Unit	1 - R D D S T
This emission unit consists of particulate emissions that are created as a result of activities conducted on both paved and unpaved roads at the facility.	

Building Information ☐ Continuation Sheet(s)

Building ID	Building Name	Length (ft)	Width (ft)	Orientation
Outside	Outside			

Emission Unit Emissions Summary ☐ Continuation Sheet(s)

Emission Unit -

CAS Number	Contaminant Name			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
CAS Number	Contaminant Name			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
CAS Number	Contaminant Name			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)
CAS Number	Contaminant Name			
ERP (lbs/yr)	Potential to Emit		Actual Emissions	
	(lbs/hr)	(lbs/yr)	(lbs/hr)	(lbs/yr)

DEC ID
9-1448-0041 9

Emission Unit	1-RDDST	**Emission Point Information**	☐ Continuation Sheet(s)

Emission Point	FUG01					
Ground Elevation (ft)	Height (ft)	Height Above Structure (ft)	Inside Diameter (in)	Exit Temp. (°F)	Cross Section	
					Length (in)	Width (in)
Fugitive						
Exit Velocity (FPS)	Exit Flow (ACFM)	NYTM (E) (KM)	NYTM (N) (KM)	Building	Distance to Property Line (ft)	Date of Removal
Fugitive						

Emission Point						
Ground Elevation (ft)	Height (ft)	Height Above Structure (ft)	Inside Diameter (in)	Exit Temp. (°F)	Cross Section	
					Length (in)	Width (in)
Exit Velocity (FPS)	Exit Flow (ACFM)	NYTM (E) (KM)	NYTM (N) (KM)	Building	Distance to Property Line (ft)	Date of Removal

Emission Point						
Ground Elevation (ft)	Height (ft)	Height Above Structure (ft)	Inside Diameter (in)	Exit Temp. (°F)	Cross Section	
					Length (in)	Width (in)
Exit Velocity (FPS)	Exit Flow (ACFM)	NYTM (E) (KM)	NYTM (N) (KM)	Building	Distance to Property Line (ft)	Date of Removal

Emission Unit	1-FUG01	**Emission Source/Control Information**	☐ Continuation Sheet(s)

Emission Source ID	Type	Date of Construction	Date of Operation	Date of Removal	Control Type Code	Control Type Description	Manufacturer's Name/Model Number
0DUST	I						Haul Vehicles

Design Capacity	Design Capacity Units Code	Design Capacity Units Description	Waste Feed Code	Waste Feed Description	Waste Type Code	Waste Type Description

Emission Source ID	Type	Date of Construction	Date of Operation	Date of Removal	Control Type Code	Control Type Description	Manufacturer's Name/Model Number

Design Capacity	Design Capacity Units Code	Design Capacity Units Description	Waste Feed Code	Waste Feed Description	Waste Type Code	Waste Type Description

Emission Source ID	Type	Date of Construction	Date of Operation	Date of Removal	Control Type Code	Control Type Description	Manufacturer's Name/Model Number

Design Capacity	Design Capacity Units Code	Design Capacity Units Description	Waste Feed Code	Waste Feed Description	Waste Type Code	Waste Type Description

DEC ID
9-1448-00419

Process Information

☐ Continuation Sheet(s)

Emission Unit	1-RDDST	Process	D01

Process Description

Particulate dust emissions from activities on the road.

Source Classification Code (SCC)	Total Throughput		Throughput Quantity Units	
	Quantity/Hr	Quantity/Yr	Code	Description

☐ Confidential ☐ Operating at Maximum Capacity	Operating Schedule		Building	Floor/Location
	Hours/Day	Days/Year		

Emission Point Identifier(s)

FUG01						

Emission Source/Control Identifier(s)

0DUST						

Emission Unit	-	Process

Process Description

Source Classification Code (SCC)	Total Throughput		Throughput Quantity Units	
	Quantity/Hr	Quantity/Yr	Code	Description

☐ Confidential ☐ Operating at Maximum Capacity	Operating Schedule		Building	Floor/Location
	Hours/Day	Days/Year		

Emission Point Identifier(s)

Emission Source/Control Identifier(s)

DEC ID
9-1448-00419

Emission Unit	Emission Point	Process	Emission Source	Emission Unit Applicable Federal Requirements							☐ Continuation Sheet(s)		
				Title	Type	Part	Subpart	Section	Subdiv.	Parag.	Subparag.	Cl.	Subcl.
1-RDDST		D01		6	NYCRR	212	1						
1-RDDST		D01		6	NYCRR	212	2						

Emission Unit	Emission Point	Process	Emission Source	Emission Unit State Only Requirements							☐ Continuation Sheet(s)		
				Title	Type	Part	Subpart	Section	Subdiv.	Parag.	Subparag.	Cl.	Subcl.

Emission Unit Compliance Certification ☐ Continuation Sheet(s)

Rule Citation

Title	Type	Part	Subpart	Section	Subdivision	Paragraph	Subparagraph	Clause	Subclause

☐ Applicable Federal Requirement ☐ State Only Requirement ☐ Capping

Emission Unit	Emission Point	Process	Emission Source	CAS Number	Contaminant Name

Monitoring Information

☐ Continuous Emission Monitoring
☐ Intermittent Emission Testing
☐ Ambient Air Monitoring
☐ Monitoring of a Process or Control Device Parameters as a Surrogate
☐ Work Practice Involving Specific Operations
☒ Record Keeping/Maintenance Procedures

Compliance Activity Description

Work Practice Type	Process Material		Reference Test Method
	Code	Description	

Monitored Parameter		Manufacturer's Name/Model Number
Code	Description	

Limit		Limit Units	
Upper	Lower	Code	Description

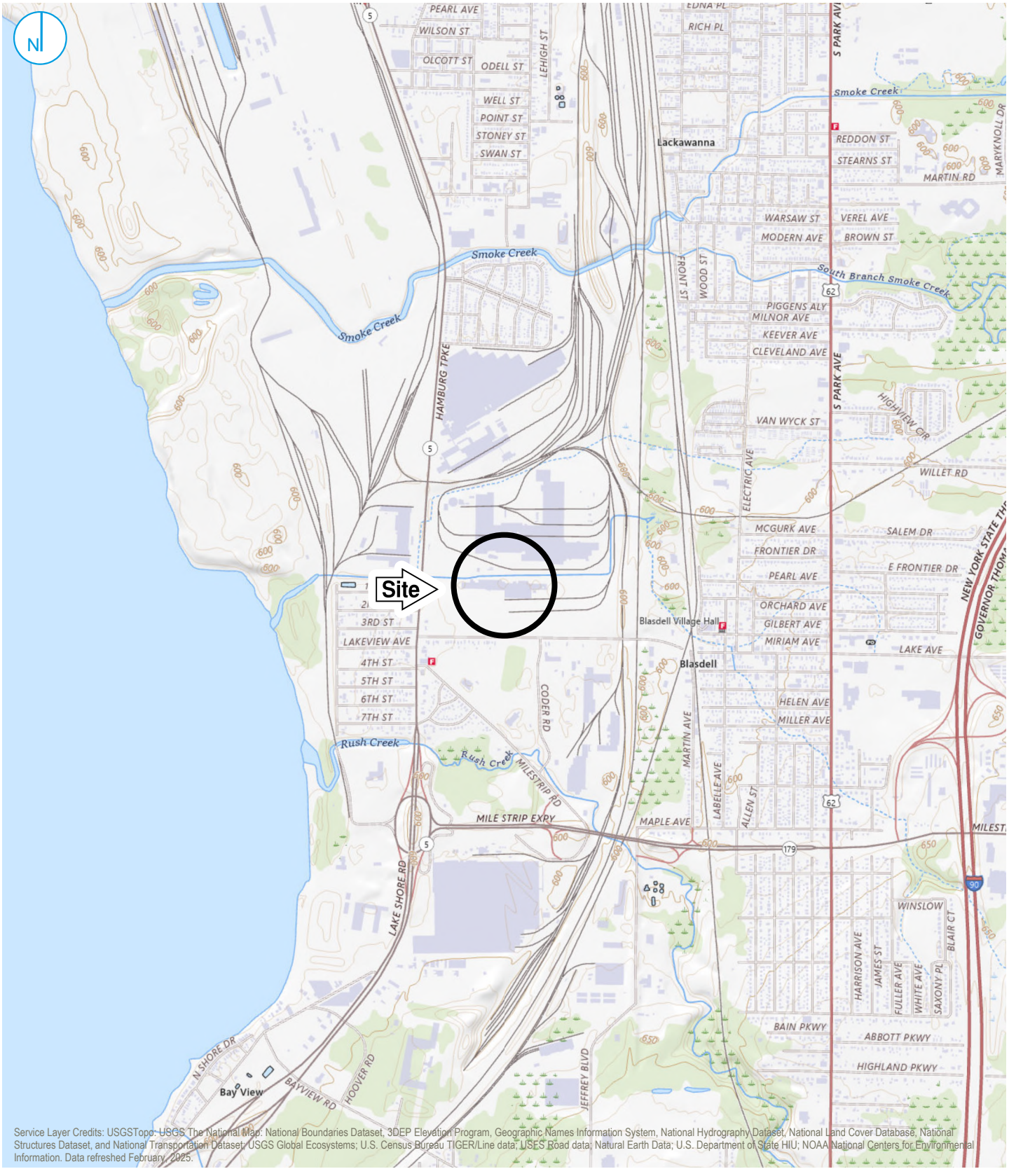
Averaging Method		Monitoring Frequency		Reporting Requirements	
Code	Description	Code	Description	Code	Description

DEC ID
9 - 1 4 4 8 - 0 0 4 1 9

Supporting Documentation and Attachments	
Required Supporting Documentation	Date of Document
☐ List of Exempt Activities (attach form)	
☒ Plot Plan (Attachment B)	March 2025
☒ Process Flow Diagram (Attachment D)	March 2025
☐ Methods Used to Determine Compliance (attach form)	
☒ Emissions Calculations (Attachment E)	March 2025
Optional Supporting Documentation	Date of Document
☐ Air Quality Model	
☐ Confidentiality Justification	
☐ Ambient Air Quality Monitoring Plan or Reports	
☐ Stack Test Protocol	
☐ Stack Test Report	
☐ Continuous Emissions Monitoring Plan	
☐ Lowest Achievable Emission Rate (LAER) Demonstration	
☐ Best Available Control Technology (BACT) Demonstration	
☐ Reasonably Available Control Technology (RACT) Demonstration	
☐ Toxic Impact Assessment (TIA)	
☐ Environmental Rating Demonstration	
☐ Operational Flexibility Protocol/Description of Alternate Operating Scenarios	
☐ Title IV Permit Application	
☐ Emission Reduction Credit (ERC) Quantification (attach form)	
☐ Baseline Period Demonstration	
☐ Use of Emission Reduction Credits (attach form)	
☐ Analysis of Contemporaneous Emissions Increase/Decrease	
Other Supporting Documentation	Date of Document
Emission Unit Matrix (Attachment C)	March 2025
Regulatory Evaluation (Attachment F)	March 2025
Climate Leadership and Community Protection Act Evaluation (Attachment G)	March 2025
Long Environmental Assessment Form (Attachment H)	March 2025
Public Participation Plan (Attachment I)	March 2025
Consent Order (Attachment J)	March 2025

Attachment B

Facility Location Map



PROJECT: 1940109897 | DATED: 3/5/2025 | DESIGNER: KAUFMADR

Map Scale: 1:24,000 | Map Center: 78°50'31"W 42°48'N

KEY MAP

0 1,000 2,000 Feet

SITE LOCATION
ASF APPLICATION

BUFFALO SHREDDING AND RECOVERY, LLC
3175 LAKE SHORE ROAD
BLASDELL, NEW YORK

DRAFT FIGURE 01

RAMBOLL AMERICAS
ENGINEERING SOLUTIONS, INC.
A RAMBOLL COMPANY

RAMBOLL

Attachment C

Emission Unit Matrix

Table C1

Emission Unit Matrix[a]

Buffalo Shredding and Recovery, LLC

Blasdell, New York

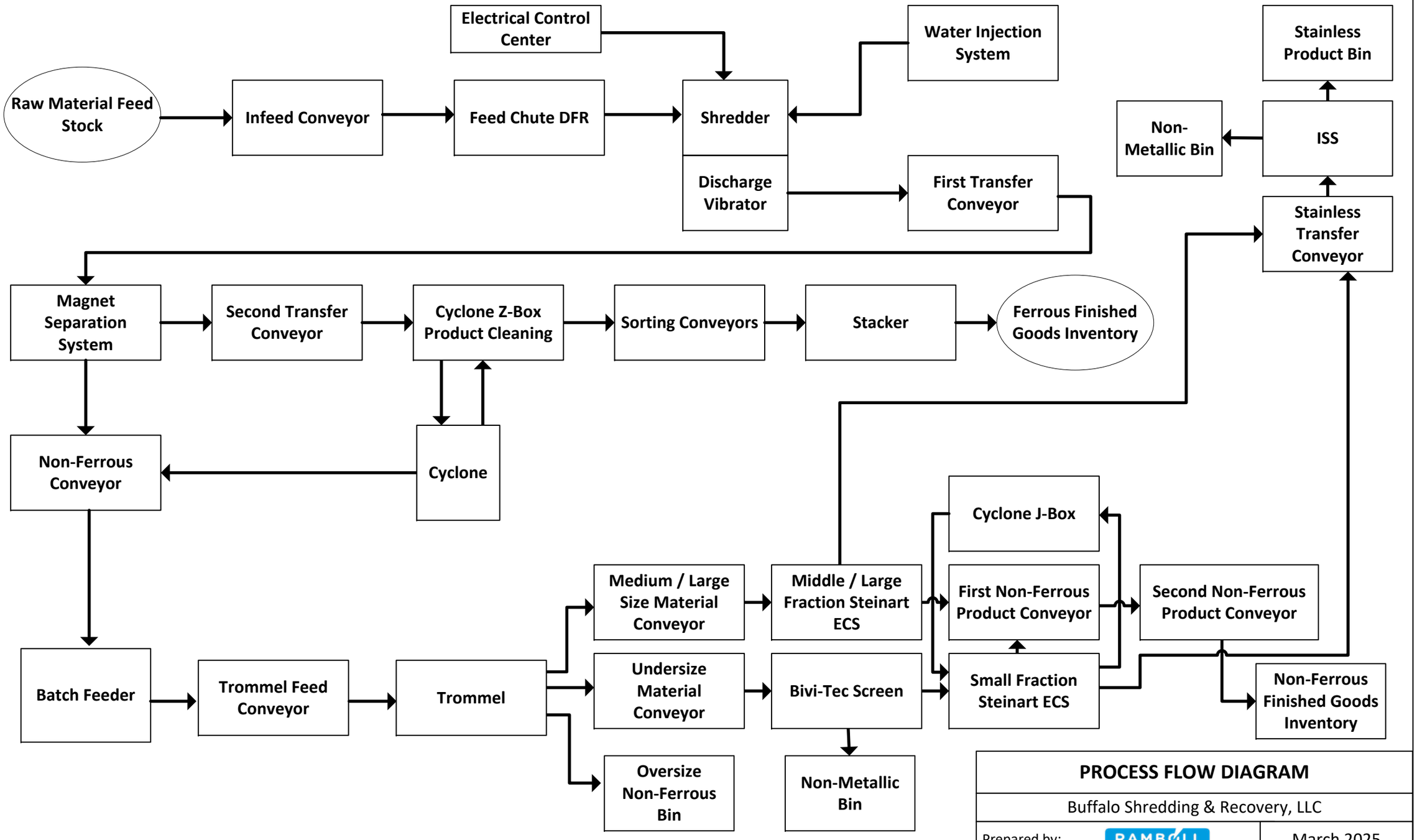
Emission Unit ID	Emission Unit Description	Process ID	Process Description	Building #	Source ID	Source Description[a]	Control Device ID	Control Device	Stack ID
1-CLBRN	This emission unit consists of the Clean Burn Unit / Air Atomizing Multi-Oil Burner which fires used oil. The burner is rated at 350,000 Btu/hr.	C01	Clean Burn Unit / Air Atomizing Multi-Oil Burner which fires used oil. The burner is rated at 350,000 Btu/hr.		C0001	Clean Burn Unit / Air Atomizing Multi-Oil Burner which fires used oil. The burner is rated at 350,000 Btu/hr			CLBRN
1-SHRED	This emission unit consists of various operations assoicated with the scrap metal processor. The scrap metal processor is capable of processing 150 short tons of material per hour.	P01	Various operations assoicated with the scrap metal processor including shredders, conveyors, and loading/unloading activities.		00001	Mixed Feed Transfer Points (4 Transfers)			FSHRD
					00002	Ferrous Transfer Points (8 Transfers)			
					00003	Non-Ferrous Transfer Points (35 Transfers)			
					00004	Shredder w/ Water Injection Control			
					00005	Z-Box			ZBOX1
					00006	J-Box			JBOX1
1-RDDST	This emission unit consists of particulate emissions that are created as a result of activities conducted on both paved and unpaved roads at the facility.	DST	Particulate dust emissions from activities on the road.		0DUST	Particulate dust emissions from activities on the road			RDDST

Notes:

(a) This table does not include exempt/trivial activities.

Attachment D

Process Flow Diagram


Electrical Control Center
Water Injection System
Stainless Product Bin
Raw Material Feed Stock
Infeed Conveyor
Feed Chute DFR
Shredder
Non-Metallic Bin
ISS
Discharge Vibrator
First Transfer Conveyor
Stainless Transfer Conveyor
Magnet Separation System
Second Transfer Conveyor
Cyclone Z-Box Product Cleaning
Sorting Conveyors
Stacker
Ferrous Finished Goods Inventory
Non-Ferrous Conveyor
Cyclone
Cyclone J-Box
Medium / Large Size Material Conveyor
Middle / Large Fraction Steinart ECS
First Non-Ferrous Product Conveyor
Second Non-Ferrous Product Conveyor
Batch Feeder
Trommel Feed Conveyor
Trommel
Undersize Material Conveyor
Bivi-Tec Screen
Small Fraction Steinart ECS
Non-Ferrous Finished Goods Inventory
Oversize Non-Ferrous Bin
Non-Metallic Bin
PROCESS FLOW DIAGRAM
Buffalo Shredding & Recovery, LLC
Prepared by:
RAMBOLL
March 2025

Attachment E

Emission Inventory

Table E1
Facility Emission Sources and Applicable Requirements
Buffalo Shredding and Recovery, LLC
Blasdell, New York

Emission Source Description	Capacity	Fuel/Material Processed	Applicable Requirements/Exempt and Trivial Activities
Clean Burn Unit / Air Atomizing Multi-Oil Burner			
Clean Burn Energy Systems Model CB-350-CTB	0.35 MMBTU/hr	Used Oil	6 NYCRR Subpart 225-2 6 NYCRR Subpart 227-1
Scrap Metal Processor			
Nevada Shredding Unit	150[(1)] Short Tons/Hour	Scrap Metal	6 NYCRR Part 212
Road Activities			
Particulate Emissions from Road Activities	--- ---	---	6 NYCRR Part 212
Torch Cutting Operations			
Torch Cutting Fugitive Emissions	--- ---	---	Trivial per 6 NYCRR 201-3.3(c)(52)
Aboveground Storage Tanks			
Storage Tank #1	2,000 Gallons	Diesel	Exempt per 6 NYCRR 201-3.2(c)(21)
Storage Tank #2	275 Gallons	Hydraulic Oil	Trivial per 6 NYCRR 201-3.3(c)(44)
Storage Tank #3	275 Gallons	Motor Oil	Trivial per 6 NYCRR 201-3.3(c)(44)
Storage Tank #4	275 Gallons	Hydraulic Oil	Trivial per 6 NYCRR 201-3.3(c)(44)
Storage Tank #5	110 Gallons	Hydraulic Oil	Trivial per 6 NYCRR 201-3.3(c)(44)
Storage Tank #6	120 Gallons	Hydraulic Oil	Trivial per 6 NYCRR 201-3.3(c)(44)
Storage Tank #9	300 Gallons	Hydraulic Oil	Trivial per 6 NYCRR 201-3.3(c)(44)
Storage Tank #10	1,000 Gallons	Diesel	Exempt per 6 NYCRR 201-3.2(c)(21)
Storage Tank #11	500 Gallons	Hydraulic Oil	Trivial per 6 NYCRR 201-3.3(c)(44)
Storage Tank #12	500 Gallons	Used Oil	Trivial per 6 NYCRR 201-3.3(c)(44)

Notes:
[(1)] Potential Hourly Throughput based on manufacturer specification letter. Potential Annual throughput based on Consent Agreement and Final Order between USEPA and Buffalo Shredding and Recovery.

Table E2
Summary of Facility Total Actual and Potential Emissions
Buffalo Shredding and Recovery, LLC
Blasdell, New York

Process	CAS Number	Emissions Source (TPY)										Total Emissions (TPY) [1]	
		C001: Clean Burn Unit		P001: Scrap Metal Processor		Storage Tanks		Road Dust [2]		Fugitive Emissions: Torch Cutting			
Pollutant		Actual Emissions	Potential Emissions	Actual Emissions	Potential Emissions	Actual Emissions	Potential Emissions	Actual Emissions	Potential Emissions	Actual Emissions	Potential Emissions	Actual Emissions	Potential Emissions
SO2	07446-09-5	8.0E-02	1.2									8.0E-02	1.2
NOX	NY210-00-0	1.2E-02	0.18									1.2E-02	0.18
CO	00630-08-0	1.6E-03	2.3E-02									1.6E-03	2.3E-02
CO2	00124-38-9	16.5	241									16.5	241
PM	NY075-00-0	2.8E-02	0.41	16	23			24	40	0.24	0.24	40	64
PM10	NY075-00-5	2.4E-02	0.36	16	23			6.8	11	0.24	0.24	23	35
PM2.5	NY075-02-5	2.4E-02	0.36	16	23			0.83	1.4	0.24	0.24	17	25
VOC	NY998-00-0	7.5E-04	1.1E-02	31	48	6.9E-04	1.3E-03					31	48
Acetone	00067-64-1			1.3E-03	1.7E-03							1.3E-03	1.7E-03
Methyl Ethyl Ketone	00078-93-3			5.3E-04	6.6E-04							5.3E-04	6.6E-04
Total HAPS	NY100-00-0			0.14	0.17							0.14	0.17
Cadmium	07440-43-9			1.2E-04	1.4E-04							1.2E-04	1.4E-04
Chromium	07440-47-3			1.3E-04	1.6E-04							1.3E-04	1.6E-04
Lead	07439 92 1			7.8E-04	9.7E-04							7.8E-04	9.7E-04
Methylene Chloride	00075-09-2			6.0E-03	7.4E-03							6.0E-03	7.4E-03
1,1-Dichloroethene	00075-35-4			1.3E-03	1.7E-03							1.3E-03	1.7E-03
1,1,1 - Trichloroethar	00071-55-6			2.0E-02	2.5E-02							2.0E-02	2.5E-02
Benzene	00071-43-2			4.0E-02	5.0E-02							4.0E-02	5.0E-02
Tetrachloroethene	00127-18-4			2.7E-04	3.3E-04							2.7E-04	3.3E-04
Trichloroethene	00079-01-6			6.6E-03	8.3E-03							6.6E-03	8.3E-03
Toluene	00108-88-3			3.3E-02	4.1E-02							3.3E-02	4.1E-02
Ethylbenzene	00100-41-4			6.6E-03	8.3E-03							6.6E-03	8.3E-03
Styrene	00100-42-5			1.3E-03	1.7E-03							1.3E-03	1.7E-03
O-Xylene	00095-47-6			6.6E-03	8.3E-03							6.6E-03	8.3E-03
M-/P-Xylene	179601-23-1			1.3E-02	1.7E-02							1.3E-02	1.7E-02

[1] Total Emissions is the sum of the pollutant from all emission sources; [C001 Pollutant (TPY)] + [P001 Pollutant (TPY) + [Storage Tanks (TPY)] + [Road Dust (TPY)] + [Fugitive Emissions (TPY)]

[2] PM emissions from road dust is assumed to total suspended particulate matter (TSP) from paved and unpaved roads.

Table E3
Clean Burn Unit Emissions
Buffalo Shredding and Recovery, LLC
Blasdell, New York

Clean Burn Unit / Air Atomizing Multi-Oil Burner

Operating Parameters

Subfacility ID:	C001	
Description:	Clean Burn Unit / Air Atomizing Multi-Oil Burner	
Actual Hours of Operation	600	hrs/yr (1)
Potential Hours of Operation	8,760	hrs/yr (1)
Burner Heat Input Rate:	350,000	BTU/hr (1)
Fuel Type	Used Oil	
Actual Fuel Usage	0.0025	TGB/hr (2)
	1.50	TGB/yr (2)
Potential Fuel Usage	0.0025	TGB/hr (2)
	21.90	TGB/yr (2)

Fuel Test Data

Ash	0.57 % (3)
Sulfur Content	1 % (4)
Heat Value	140,000 BTU/gal (4)

Emissions Calculations

				Actual Emissions (5)			Potential Emissions (5)		
Pollutant		**Emission Factor**		**lb/hr**	**lb/yr**	**TPY**	**lb/hr**	**lb/yr**	**TPY**
SO2 (6)	07446-09-5	107	lb/TGB	0.27	161	8.0E-02	0.27	2,343	1.2
NOX (6)	NY210-00-0	16	lb/TGB	4.0E-02	24	1.2E-02	4.0E-02	350	0.18
CO (6)	00630-08-0	2.1	lb/TGB	5.3E-03	3.2	1.6E-03	5.3E-03	46	2.3E-02
PM (6)	NY075-00-0	37.62	lb/TGB	9.4E-02	56	2.8E-02	9.4E-02	824	0.41
PM10 (6)	NY075-00-5	32.49	lb/TGB	8.1E-02	49	2.4E-02	8.1E-02	712	0.36
PM2.5 (6)	NY075-02-5	32.49	lb/TGB	8.1E-02	49	2.4E-02	8.1E-02	712	0.36
PM (Condensable) (7)		5.13	lb/TGB	1.3E-02	7.7	3.8E-03	1.3E-02	112	5.6E-02
VOC (6)	NY998-00-0	1	lb/TGB	2.50E-03	1.5	7.5E-04	2.5E-03	22	1.1E-02
CO2 (6)	00124-38-9	22,000	lb/TGB	55.00	33,000	16.5	55	481,800	241

(1) Estimated actual annual hours of operation and burner rating provided by facility personnel.

(2) Based on burner plate (EnergyLogic EL-350H) fuel input is 2.5 GPH.
Annual Fuel Usage (TGB/yr) = [Hourly Fuel Usage (TGB/hr)] x [Annual Hours of Operation (hrs/yr)].
Where TGB = Thousand Gallons Burned.

(3) Due to limited data avaliable, assumed ash content based on the average ash concentration for waste oil as provided under AP-42 Ch. 1.11, Background Document, Table 2.1.

(4) Due to limited data available, assumed sulfur content and heating value based on AP-42, Appendix A.

(5) Hourly Emissions (lb/hr) = [Emission Factor (lb/TGB)] x [Fuel Consumption (TGB/hr)]; Annual Emissions (TPY) = [Hourly Emissions (lb/hr)] x [Hours of Operation (hr/yr)] x [1 ton/2000 lbs]

(6) Emission Factor is based on AP-42, Tables 1.11-1, 1.11-2, and 1.11-3. For VOC = TOC.

(7) PM (Condensable) is the difference between PM and PM10.

Table E4
Scrap Metal Processor Emissions
Buffalo Shredding and Recovery, LLC
Blasdell, New York

Subfacility ID:	P001	
Description:	Scrap Metal Processor	
Actual Hours of Operation	1,328	hrs/yr (1)
Potential Hours of Operation	1,650	hrs/yr (1)
	118	Tons Per Hour (2)
Actual Process Rate	156,470	Tons Per Year (2)
	150	Tons Per Hour (2)
Potential Process Rate	247,500	Tons Per Year (2)

Identification of Emission Points:

EP No.	EP Description
01	Truck Unloading
02	Transfer to Infeed Conveyor
03	Shredder: Feed into Shredder
04	Shredder
05	Shredder to Undermill Oscillator
06	Undermill Oscillator to Magnetic Feed Conveyor
07	Magnetic Feed Conveyor to Magnetic Drum
08	Magnetic Drum to Cascade Feed Conveyor
09	Cascade Feed Conveyor to Cyclone Z-Box
010	Cyclone Z-Box to Picking Conveyors
011	Picking Conveyors to Cross-Over Conveyor
012	Cross-Over Conveyor to Transfer Conveyor
013	Transfer Conveyor to Radial Stacker
014	Non-Ferrous Transfer Conveyor to EMS Waste Conveyor
015	EMS Waste Conveyor to Zurik Conveyor
016	Vibratory Batch Feeder to Main Infeed Conveyor #1
017	Main Infeed Conveyor #1 to Trommel
018	Trommel to Oversize Conveyor
019	Oversize Conveyor to Main Waste Conveyor #1
020	Trommel to Large Fraction Infeed Conveyor (1.5" - 4.5")
021	Large Fraction Infeed Conveyor (1.5" - 4.5") to Large Fraction ECS Waste Conveyor
022	Large Fraction ECS Waste Conveyor to Large Fraction Heavies Conveyor
023	Large Fraction Heavies Conveyor to Large Wire Picking Station Conveyor
024	Large Wire Picking Station Conveyor to Wire Conveyor
025	Trommel to Trommel Unders to Bivitec Conveyor
026	Trommel Unders to Bivitec Conveyor to Mid Fraction Transfer Conveyor
027	Mid Fraction Transfer Conveyor to Mid Fraction Infeed Conveyor (0.75" - 1.5")
028	Mid Fraction Infeed Conveyor (0.75" - 1.5") to Mid Fraction ECS Waste Conveyor
029	Mid Fraction ECS Waste Conveyor to Mid Fraction Heavies Conveyor
030	Mid Fraction Heavies Conveyor to Mid Wire Picking Station Conveyor
031	Mid Wire Picking Station Conveyor to Wire Conveyor
032	Trommel Unders to Bivitec Conveyor to Single Deck Bivitec
033	Single Deck Bivitec to Small Fraction Infeed Conveyor (<0.75")
034	Small Fraction Infeed Conveyor (<0.75") to Zobra Conveyor #1
035	Zobra Conveyor #1 to Zobra Conveyor #2
036	Zobra Conveyor #2 to Zobra Conveyor #3
037	Zobra Conveyor #3 to Cyclone J-Box
038	Cyclone J-Box to Zobra Conveyor #4
039	Small Fraction Infeed Conveyor (<0.75") to Small Fraction Split Conveyor
040	Small Fraction Split Conveyor to Small ECS Waste Conveyor #3
041	Small ECS Waste Conveyor #3 to Main Waste Conveyor #1
042	Main Waste Conveyor #1 to Main Waste Conveyor #4
043	Main Waste Conveyor #4 to Main Waste Conveyor #5
044	Main Waste Conveyor #1 to Main Waste Conveyor #2
045	Main Waste Conveyor #2 to Main Waste Conveyor #3
046	Main Waste Conveyor #3 to EMS Waste Conveyor
047	EMS Waste Conveyor to Tailings Conveyor

Table E4
Scrap Metal Processor Emissions
Buffalo Shredding and Recovery, LLC
Blasdell, New York

Scrap Metal Actual Emissions Calculations

Emission Calculations

Pollutant	CAS#	Emission Factor		Emission Rate Potential[12]	Actual Emissions		Potential Emissions	
				(lb/hr)	(lb/yr)	(TPY)	(lb/yr)	(TPY)
PM/PM10/PM2.5 [3]	NY075-00-0 NY075-00-5 NY075-02-5	---	---	---	31,598	16	46,890	23
Mixed Feed Transfer Points (4 Transfers) [4]	---	2.6E-03	lb/ton	118	1,609	0.80	2,544	1.3
Ferrous Transfer Points (8 Transfers) [5]	---	2.6E-03	lb/ton	77	3,217	1.6	5,089	2.5
Non-Ferrous Transfer Points (35 Transfers) [6]	---	2.6E-03	lb/ton	41	14,074	7.0	22,263	11.1
Shredder w/ Water Injection Control [7]	---	4.7E-02	lb/ton	118	7,385	3.7	11,682	5.8
Z-Box [8]	---	2.0	lb/hr	2.0	2,656	1.3	2,656	1.3
J-Box [9]	---	2.0	lb/hr	2.0	2,656	1.3	2,656	1.3
VOC [10]	NY998-00-0	0.39	lb/ton		61,023	31	96,525	48
Acetone[11]	00067-64-1	2.0E-03	lb/hr	2.0E-03	2.7	1.3E-03	3.3	1.7E-03
Methyl Ethyl Ketone[11]	00078-93-3	8.0E-04	lb/hr	8.0E-04	1.1	5.3E-04	1.3	6.6E-04
Total HAPS[11]	NY100-00-0				272	0.14	338	0.17
Cadmium	07440-43-9	1.7E-04	lb/hr	1.7E-04	0.23	1.2E-04	0.29	1.4E-04
Chromium	07440-47-3	1.9E-04	lb/hr	1.9E-04	0.26	1.3E-04	0.32	1.6E-04
Lead	07439 92 1	1.2E-03	lb/hr	1.2E-03	1.6	7.8E-04	1.9	9.7E-04
Methylene Chloride	00075-09-2	9.0E-03	lb/hr	9.0E-03	12	6.0E-03	15	7.4E-03
1,1-Dichloroethene	00075-35-4	2.0E-03	lb/hr	2.0E-03	2.7	1.3E-03	3.3	1.7E-03
1,1,1 - Trichloroethane	00071-55-6	3.0E-02	lb/hr	3.0E-02	40	2.0E-02	50	2.5E-02
Benzene	00071-43-2	6.0E-02	lb/hr	6.0E-02	80	4.0E-02	99	5.0E-02
Tetrachloroethene	00127-18-4	4.0E-04	lb/hr	4.0E-04	0.53	2.7E-04	0.66	3.3E-04
Trichloroethene	00079-01-6	1.0E-02	lb/hr	1.0E-02	13	6.6E-03	17	8.3E-03
Toluene	00108-88-3	5.0E-02	lb/hr	5.0E-02	66	3.3E-02	83	4.1E-02
Ethylbenzene	00100-41-4	1.0E-02	lb/hr	1.0E-02	13	6.6E-03	17	8.3E-03
Styrene	00100-42-5	2.0E-03	lb/hr	2.0E-03	2.7	1.3E-03	3.3	1.7E-03
O-Xylene	00095-47-6	1.0E-02	lb/hr	1.0E-02	13	6.6E-03	17	8.3E-03
M-/P-Xylene	179601-23-1	2.0E-02	lb/hr	2.0E-02	27	1.3E-02	33	1.7E-02

[1] Actual hours of operation based on average of 2022 and 2023 operating hours provided by facility personnel. Potential hours of operation determined based on operational limits.

[2] Potential Hourly Throughput based on manufacturer specification letter. Potential Annual throughput based on Consent Agreement and Final Order between USEPA and Buffalo Shredding and Recovery.
Actual Average Annual throughput is calculated from the amount purchased in 2022 and 2023 provided by facility personnel.
Hourly throughput (ton/hr) = [Annual Throughput (tpy)] / [Hours of Operation (hrs/yr)]

[3] PM Emissions = [Mixed Feed Transfer Points PM] + [Ferrous Transfer Points PM] + [Non-Ferrous Transfer Point PM] + [Shredder PM] + [J-Box PM] + [Z-Box PM]

[4] Hourly Mixed Feed Transfer Point PM (lb/hr) = [Transfer Point Emission Factor (lb/ton)] x [4 transfer points] x [Mixed Feed Throughput (ton/hr)]; Annual Mixed Feed Transfer Point PM (TPY) = [Transfer Point Emission Factor (lb/ton)] x [4 transfer points] x [Mixed Feed Throughput (tons/yr)] x [1 ton/2000 lbs]. Emission Factor based on Table D-10F in Institute of Scrap Recycling Industries, Inc. Title V Applicability Workbook. Washington DC: Institute of Scrap Recycling Industries, 1998.

[5] Hourly Ferrous Feed Transfer Point PM (lb/hr) = [Transfer Point Emission Factor (lb/ton)] x [8 transfer points] x [Ferrous Feed Throughput (tons/hour)]; Annual Ferrous Feed Transfer Point PM (TPY) = [Transfer Point Emission Factor (lb/ton)] x [8 transfer points] x [Ferrous Feed Throughput (tons/yr)] x [1 ton/2000 lbs]. Emission Factor based on Table D-10F in Institute of Scrap Recycling Industries, Inc. Title V Applicability Workbook. Washington DC: Institute of Scrap Recycling Industries, 1998. Assumes 65% of the mixed feed rate is ferrous material.

[6] Hourly Non-Ferrous Feed Transfer Point PM (lb/hr) = [Transfer Point Emission Factor (lb/ton)] x [35 transfer points] x [Non-Ferrous Feed Throughput (tons/hr)]; Annual Non-Ferrous Feed Transfer Point PM (TPY) = [Transfer Point Emission Factor (lb/ton)] x [35 transfer points] x [Non-Ferrous Feed Throughput (tons/yr)] x [1 ton/2000 lbs]. Emission Factor based on Table D-10F in Institute of Scrap Recycling Industries, Inc. Title V Applicability Workbook. Washington DC: Institute of Scrap Recycling Industries, 1998. Assumes 35% of the mixed feed rate is non-ferrous material.

[7] Hourly Shredder w/ Water Injection Control PM (lb/hr) = [Shredder Emission Factor (lb/ton)] x [Mixed Feed Throughput (tons/yr)]; Annual Shredder w/ Water Injection Control PM (TPY) = [Shredder Emission Factor (lb/ton)] x [Mixed Feed Throughput (tons/yr)] x [1 ton/2000 lbs]. Emission Factor based on testing conducted on a similar source (General Iron Test Report, 2018).

[8] Z-Box PM (TPY) = [Z-Box Emission Factor (lb/hr)] x [Hours of Operation (hrs/yr)] x [1 ton/2000 lbs]. Emission Factor based on information provided by facility personnel.

[9] J-Box PM (TPY) = [J-Box Emission Factor (lb/hr)] x [Hours of Operation (hrs/yr)] x [1 ton/2000 lbs]. Emission Factor based on information provided by facility personnel.

[10] Annual VOC Emissions (TPY) = [VOC Emission Factor (lb/ton)] x [Mixed Feed Throughput (tons/yr)] x [1 ton/2000 lbs].
The Emission Factor is 0.39 lb VOC per ton on a propane basis and is based on the Metalico - Neville Island Administrative Compliance Order of Consent issued by USEPA on December 9, 2022.

[11] Hourly emission factors for speciated HAPs, Acetone, and Methyl Ethyl Ketone are based on Institute of Scrap Recycling Industries, Inc. Title V Applicability Workbook. Washington DC: Institute of Scrap Recycling Industries, 1998. Table D-11.F. Total HAPs is calculated as the sum of all speciated HAPs.

Actual Annual Emissions (lb/yr) = Emission Factor (lb/hr) x Actual Annual Operating hours
Actual Annual Emissions (typ) = Actual Emissions (lb/yr) ÷ 2,000 (lb/ton)
Potential Annual Emissions (lb/yr) = Emission Factor (lb/hr) x Potential Annual Operating hours
Actual Annual Emissions (typ) = Potential Emissions (lb/yr) ÷ 2,000 (lb/ton)

[12] Emission Rate Potential for all speciated pollutants is equal to the emission factor in lb/hr.

Table E5
Fixed Roof Tank Losses Emissions
Buffalo Shredding and Recovery, LLC
Blasdell, New York

Routine Losses From Fixed Roof Tanks (AP 42, Ch.7, 7.1.3.1)

VOC Emissions Summary

	Actual Throughput		Potential Throughput		Actual Annual VOC Emissions		Potential Annual VOC Emissior	
Fuel Type	**gal/yr**	**gal/day [1]**	**gal/yr**	**gal/day [1]**	**(lb/yr)**	**(TPY)**	**(lb/yr)**	**(TPY)**
Diesel	46,005	126	100,000	274	1.2	5.9E-04	2.2	1.11E-03
Hydraulic Oil	6,081	17	20,000	55	0.14	7.1E-05	0.23	1.15E-04
Motor Oil	193	1	500	1	1.81E-02	9.1E-06	2.00E-02	1.00E-05
Used Oil	1,150	3	21,900	60	3.98E-02	2.0E-05	0.15	7.66E-05
Cumulative	53,429	146	142,400	390	1.4	6.93E-04	2.6	1.31E-03

Storage Tank Calculations
Local atmospheric properties[1]

Average daily maximum ambient temperature, TAX (°R)	515.7
Average daily minimum ambient temperature, TAN (°R)	500.6
erage daily total insolation on a horizontal surface, I (Btu/(ft^2/day))	1,170

[1] From AP 42 Table 7.1-7 for Buffalo, NY, assume storage tank usage rate consistent across calendar year.

Storage tank properties

	Tank 1	Tank 2	Tank 3	Tank 4	Tank 5	Tank 6	Tank 9	Tank 10	Tank 11	Tank 12
Contents	Diesel	Hydraulic Oil	Motor Oil	Hydraulic Oil	Hydraulic Oil	Hydraulic Oil	Hydraulic Oil	Diesel	Hydraulic Oil	Used Oil
Orientation	Horizontal	Horizontal	Horizontal	Horizontal	Horizontal	Horizontal	Horizontal	Horizontal	Horizontal	Horizontal
Capacity (gal)	2,000	275	275	275	110	120	300	1,000	500	500
Shell diameter, D (ft)	5.33	3.33	3.33	3.33	2.50	2.00	3.17	4.00	4.00	4.00
Shell length or height, H (ft)	12.00	4.00	4.00	4.00	3.67	5.67	5.08	11.00	5.50	5.50
Shell color/shade	White	Green	Green	Green	Green	Green	Green	White	Green	Green
Tank surface solar absorptance, α (dimensionless) [1]	0.25	0.90	0.90	0.90	0.90	0.90	0.90	0.25	0.90	0.90
Vapor molecular weight, MV (lb/lb-mole) [2]	130	130	130	130	130	130	130	130	130	130
Vapor pressure (mmHg) [3]	0.31	0.10	0.10	0.10	0.10	0.10	0.10	0.31	0.10	0.10
Vapor pressure, PVA (psia) [4]	0.006	0.002	0.002	0.002	0.002	0.002	0.002	0.006	0.002	0.002
2023 Actual Annual net throughput (gal/yr) [5]	29,098	548	191	548	219	239	597	14,549	996	800
2022 Actual Annual net throughput (gal/yr) [5]	32,242	1,569	195	1,569	628	685	1,712	16,121	2,853	1,500
AVG Annual net throughput (gal/yr) [5]	30,670	1,058	193	1,058	423	462	1,155	15,335	1,924	1,150
Potentials Annual net throughput, Q (bbl/yr) [6]	730.24	25.20	4.60	25.20	10.08	11.00	27.49	365.12	45.81	27.38
Potential Annual net throughput (gal/yr) [5]	66,667	3,481	500	3,481	1,392	1,519	3,797	33,333	6,329	21,900
Potential Annual net throughput, Q (bbl/yr) [6]	1587.30	82.88	11.90	82.88	33.15	36.17	90.42	793.65	150.69	521.43

[1] From AP 42, Table 7.1-6, based on paint color, assume average paint condition and same color for whole tank.
[2] From AP 42, Table 7.1-2, using values of No. 2 Fuel Oil for Diesel, and No. 6 Fuel Oil for: Hydraulic Oil, Used Oil, and Motor Oil.
[3] Conversion: 1 psia = 51.715 mmHg
[4] From AP 42, Table 7.1-2, using values of No. 2 Fuel Oil for Diesel, and No. 6 Fuel Oil for: Hydraulic Oil, Used Oil, and Motor Oil.
[5] Estimated from fuel usage records.
[6] Conversion: bbl/yr = (gal/yr) / (42 gal/bbl)
[7] Tank 7 and Tank 8, which contain hydraulic oil, are 33 gallon tanks and not included in the calculations due to tank volume.

Table E5
Fixed Roof Tank Losses Emissions
Buffalo Shredding and Recovery, LLC
Blasdell, New York

Routine losses for horizontal storage tanks (VOC's)

	Tank 1	Tank 2	Tank 3	Tank 4	Tank 5	Tank 6	Tank 9	Tank 10	Tank 11	Tank 12
Standing loss, LS (lb/yr)	**0.21**	**0.02**	**0.02**	**0.02**	**0.01**	**0.01**	**0.02**	**0.11**	**0.03**	**0.03**
Vapor space expansion factor, KE (day^-1) [1]	0.03	0.06	0.06	0.06	0.06	0.06	0.06	0.03	0.06	0.06
Effective diameter, DE (ft)	9.03	4.12	4.12	4.12	3.42	3.80	4.53	7.48	5.29	5.29
Effective height, HE (ft)	4.19	2.62	2.62	2.62	1.96	1.57	2.49	3.14	3.14	3.14
Vented vapor saturation factor, KS (dimensionless)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Vapor space outage, HVO (ft)	2.09	1.31	1.31	1.31	0.98	0.79	1.24	1.57	1.57	1.57
Stock vapor density, WV (lb/ft3)	1.42E-04	4.67E-05	4.67E-05	4.67E-05	4.67E-05	4.67E-05	4.67E-05	1.42E-04	4.67E-05	4.67E-05
Average vapor temperature, TV (°R) [2]	511.05	518.57	518.57	518.57	518.57	518.57	518.57	511.05	518.57	518.57
Average daily ambient temperature, TAA (°R)	508.15	508.15	508.15	508.15	508.15	508.15	508.15	508.15	508.15	508.15
Liquid bulk temperature, TB (°R) [3]	509.03	511.31	511.31	511.31	511.31	511.31	511.31	509.03	511.31	511.31
Actual Working loss, LW (lb/yr)	**0.58**	**0.01**	**0.00**	**0.01**	**0.00**	**0.00**	**0.01**	**0.29**	**0.01**	**0.01**
Potential Working loss, LW (lb/yr)	**1.27**	**0.02**	**0.00**	**0.02**	**0.01**	**0.01**	**0.02**	**0.63**	**0.04**	**0.12**
Working loss turnover factor, KN (dimensionless)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.87
Working loss product factor, KP (dimensionless)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Vent setting correction factor, KB (dimensionless)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Actual Number of turnovers per year, N (dimensionless)	**15.29**	**4.06**	**0.74**	**4.06**	**3.14**	**3.47**	**3.85**	**14.83**	**3.72**	**2.22**
Actual Annual sum of increases in liquid level, ΣHQI (ft/yr)	**64.06**	**10.62**	**1.94**	**10.62**	**6.17**	**5.45**	**9.59**	**46.59**	**11.69**	**6.99**
Actual Net working loss throughput, VQ (ft3/yr)	**4,099.56**	**141.46**	**25.80**	**141.46**	**56.58**	**61.73**	**154.32**	**2,049.78**	**257.20**	**153.72**
Actual Total routine losses, LT (lb/yr)	**0.79**	**0.02**	**0.02**	**0.02**	**0.01**	**0.01**	**0.03**	**0.40**	**0.05**	**0.04**
Actual Total routine losses, LT (TPY)	**3.94E-04**	**1.18E-05**	**9.06E-06**	**1.18E-05**	**5.69E-06**	**5.76E-06**	**1.33E-05**	**1.99E-04**	**2.28E-05**	**1.99E-05**
Potential Number of turnovers per year, N (dimensionless)	**33.24**	**13.36**	**1.92**	**13.36**	**10.34**	**11.41**	**12.68**	**32.23**	**12.24**	**42.35**
Potential Annual sum of increases in liquid level, ΣHQI (ft/yr)	**139.24**	**34.93**	**5.02**	**34.93**	**20.30**	**17.92**	**31.53**	**101.26**	**38.45**	**133.06**
Potential Net working loss throughput, VQ (ft3/yr)	**8,911.11**	**465.30**	**66.83**	**465.30**	**186.12**	**203.04**	**507.59**	**4,455.56**	**845.99**	**2,927.30**
Potential Total routine losses, LT (lb/yr)	**1.47**	**0.04**	**0.02**	**0.04**	**0.02**	**0.02**	**0.04**	**0.74**	**0.07**	**0.15**
Potential Total routine losses, LT (TPY)	**7.36E-04**	**1.93E-05**	**1.00E-05**	**1.93E-05**	**8.72E-06**	**9.06E-06**	**2.16E-05**	**3.70E-04**	**3.65E-05**	**7.66E-05**

[1] If the liquid stored in the fixed roof tank has a true vapor pressure less than 0.1 psia and the tank breather vent settings are not greater than ±0.03 psig, Equation 1-12 or Equation 1-13 may be used with an acceptable loss in accuracy. If the tank location and tank color and condition are known, KE may be calculated using equation 1-12 in lieu of Equation 1-5.

[2] API assigns a default value of H/D = 0.5 and an assumption of αR = αS, resulting in the simplified equation for an uninsulated tank (Equation 1-33).

[3] For uninsulated fixed roof tanks known to be in approximate equilibrium with ambient air, heat gain to the bulk liquid from insolation is almost entirely through the tank shell; thus the liquid bulk temperature is not sensitive to HS/D and may be calculated using Equation 1-31.

Table E5
Fixed Roof Tank Losses Emissions
Buffalo Shredding and Recovery, LLC
Blasdell, New York

Summary of equations from AP 42, Chapter 7

Total routine losses, LT
LT=LS+LW [Eq. 1-1]
LT = total routine losses, lb/yr
LS = standing losses, lb/yr, see Equation 1-2
LW = working losses, lb/yr, see Equation 1-35

Standing loss, LS
LS=365*KE*((PI/4)*D^2)*HVO*KS*WV [Eq. 1-4]
LS = standing loss, lb/yr
KE = vapor space expansion factor, per day, see Equation 1-5, 1-12, or 1-13
D = diameter, ft, use DE from Equation 1-14 for horizontal tanks
HVO = vapor space outage, ft, see Equation 1-16; use HE/2 from Equation 1-15 for horizontal tanks
KS = vented vapor saturation factor, dimensionless, see Equation 1-21
WV = stock vapor density, lb/ft3, see Equation 1-22
365 = constant, the number of daily events in a year, (days/year)

Vapor space expansion factor, KE
KE=0.0018*ΔTV=0.0018*(0.7*(TAX-TAN)+0.02*α*I) [Eq 1-12]
KE = vapor space expansion factor, per day
ΔTV = average daily vapor temperature range, °R
TAX = average daily maximum ambient temperature, °R
TAN = average daily minimum ambient temperature, °R
α = tank surface solar absorptance, dimensionless
I = average daily total insolation on a horizontal surface, Btu/(ft2/day)
0.0018 = constant, (°R)^-1
0.7 = constant, dimensionless
0.02 = constant, (°R ft2/day)/Btu

Effective diameter, DE (for horizontal tanks)
DE=sqrt((L*D)/(PI/4)) [Eq 1-14]
DE = effective tank diameter, ft
L = length of the horizontal tank, ft (for tanks with rounded ends, use the overall length)
D = diameter of a vertical cross-section of the horizontal tank, ft

Effective height, HE (for horizontal tanks)
HE=(PI/4)*D [Eq 1-15]
HE = effective height of an equivalent upright cylinder (for horizontal cylinders)

Vented vapor saturation factor, KS
KS=1/(1+0.053*PVA*HVO) [Eq 1-21]
KS = vented vapor saturation factor, dimensionless
PVA = vapor pressure at average daily liquid surface temperature, psia; see Notes 1 and 2 to Equation 1-22
HVO = vapor space outage, ft, see Equation 1-16; use HE/2 from Equation 1-15 for horizontal tanks
0.053 = constant, (psia-ft)^-1

Vapor space outage, HVO
HVO=HS-HL+HRO [Eq 1-16]
HVO = vapor space outage, ft; use HE/2 from Equation 1-15 for horizontal tanks
HS = tank shell height, ft
HL = liquid height, ft
HRO = roof outage, ft

Stock vapor density, WV
WV=(MV*PVA)/(R*TV) [Eq 1-22]
WV = vapor density, lb/ft3
MV = vapor molecular weight, lb/lb-mole; see Note 1
R = the ideal gas constant, 10.731 psia ft3/lb-mole °R
PVA = vapor pressure at average daily liquid surface temperature, psia; see Notes 1 and 2 to Equation 1-22
TV = average vapor temperature, °R; see Note 6

Table E5
Fixed Roof Tank Losses Emissions
Buffalo Shredding and Recovery, LLC
Blasdell, New York

Average vapor temperature, TV
TV=0.7*TAA+0.3*TB+0.009*α*I [Eq 1-33]
TV = average vapor temperature, °R
TAA = average daily ambient temperature, °R
TB = liquid bulk temperature, °R
α = average tank surface solar absorptance, dimensionless
I = average daily total insolation factor, Btu/(ft2/day)

Average daily ambient temperature, TAA
TAA=(TAX+TAN)/2 [Eq 1-30]
TAA = average daily ambient temperature, °R
TAX = average daily maximum ambient temperature, °R
TAN = average daily minimum ambient temperature, °R

Liquid bulk temperature, TB
TB=TAA+0.003*αS*I [Eq 1-31]
TB = liquid bulk temperature, °R
TAA = average daily ambient temperature, °R, as calculated in Equation 1-30
αS = tank shell surface solar absorptance, dimensionless; see Table 7.1-6
I = average daily total insolation factor, Btu/(ft2/day); see Table 7.1-7

Working loss, LW
LW=VQ*KN*KP*WV*KB [Eq 1-35]
LW = working loss, lb/yr
VQ = net working loss throughput, ft3/yr, see Note 1 of Equation 1-35
KN = working loss turnover (saturation) factor, dimensionless
for turnovers > 36, KN = (180 + N)/6N
for turnovers ≤ 36, KN = 1
N = number of turnovers per year, dimensionless
KP = working loss product factor, dimensionless, for crude oils, KP = 0.75, for all other organic liquids, KP = 1
WV = vapor density, lb/ft3, see Equation 1-22
KB = vent setting correction factor, dimensionless, for open vents and for a vent setting range up to ± 0.03 psig, KB = 1

Number of turnovers per year, N
N=ΣHQI/(HLX-HLN) [Eq 1-36]
N = number of turnovers per year, dimensionless
ΣHQI = the annual sum of the increases in liquid level, ft/yr
HLX = maximum liquid height, ft, for horizontal tanks use (π/4)*D
HLN = minimum liquid height, ft, for horizontal tanks use 0

Annual sum of the increases in liquid level, ΣHQI
ΣHQI=(5.614*Q)/((PI/4)*D^2) [Eq 1-37]
ΣHQI = the annual sum of the increases in liquid level, ft/yr
5.614 =the conversion of barrels to cubic feet, ft3/bbl
Q = annual net throughput, bbl/yr
For horizontal tanks, use DE (Equation 1-14) in place of D in Equation 1-37

Net working loss throughput, VQ
VQ=(ΣHQI)*(PI/4)*D^2 [Eq 1-38]
VQ = annual sum of the increases in liquid level, ft3/yr
ΣHQI = the annual sum of the increases in liquid level, ft/yr
DE should be used for horizontal tanks in place of D in Equation 1-38

Table E6
Road Dust Emissions
Buffalo Shredding and Recovery, LLC
Blasdell, New York

Paved Road Parameters

Paved Road Distance [1]	0.57	miles
Actual Total Vehicle Miles Traveled (VMT) [1]	11,750	VMT/yr
Potential Total Vehicle Miles Traveled (VMT) [1]	20,000	VMT/yr
Particle Size Multiplier (k)[2]		
PM-30	0.011	lb/VMT
PM-10	0.0022	lb/VMT
PM-2.5	0.00054	lb/VMT
Road Surface Silt Loading (sL) [3]	9.7	g/m^2
Ave. Weight of Vehicles Traveling Road (W) [4]	12.21	tons
Light Duty Gasoline Vehicles (LDGV) [5]	2	tons
Heavy-Duty Gasoline Vehicles (HDGV) [1][6]	6.38	tons
Heavy-Duty Diesel Vehicles (HDDV) [1][6]	28.25	tons
Number of "Wet" days with at least 0.01 in during averaging period (P) [7]	150	days
Days in Averaging Period (N)	365	days

[1] Based on information provided by facility personnel.

[2] Based on AP-42, Table 13.2.1-1.

[3] Based on AP-42, Table 13.2.1-3. Assume industrial road at an iron/steel production facility.

[4] Average weight of LDGV, HDGV, and HDDV.

[5] Light-duty gasoline vehicle (LDGV) is an automobile, pickup truck, or any other general vehicle with a weight of less than 4 tons. Assume light-duty gasoline vehicles weigh on average 2 tons.

[6] Heavy-duty vehicle is a truck or other vehicle 4 tons or greater, including the weight of the material being transferred.

[7] Based on AP-42, Figure 13.2.1-2.

Table E6
Road Dust Emissions
Buffalo Shredding and Recovery, LLC
Blasdell, New York

Unpaved Road Parameters

Unpaved Road Distance [1]	0.37 miles
Actual Total Vehicle Miles Traveled (VMT) [1]	7,750 VMT/yr
Potential Total Vehicle Miles Traveled (VMT) [1]	13,000 VMT/yr
Empirical Constant *k* [2]	
PM-30	4.9 lb/VMT
PM-10	1.5 lb/VMT
PM-2.5	0.15 lb/VMT
Empirical Constant *a* [2]	
PM-30	0.7
PM-10	0.9
Empirical Constant *b* [2]	
PM-30	0.45
PM-10	0.45
Surface Material Silt Content (s) [3]	13.5 %
Number of "Wet" days with at least 0.01 in during averaging period (P) [4]	150 days
Ave. Weight of Vehicles Traveling Road (W) [5]	7.0 tons
Light Duty Gasoline Vehicles (LDGV) [6]	2 tons
Heavy-Duty Gasoline Vehicles (HDGV) [1][7]	2.5 tons
Heavy-Duty Diesel Vehicles (HDDV) [1][7]	16.5 tons

[1] An average annual milage was calculated based on information provided by facility personnel for 2022 and 2023.

[2] Based on AP-42, Table 13.2.2-2.

[3] Based on AP-42, Table 13.2.2-3. Assume surface silt content is the average between 1.8 - 25.2% for industrial roads.

[4] Based on AP-42, Figure 13.2.2-1.

[5] Average weight of LDGV, HDGV, and HDDV.

[6] Light-duty gasoline vehicle (LDGV) is an automobile, pickup truck, or any other general vehicle with a weight of less than 4 tons. Assume light-duty gasoline vehicles weigh on average 2 tons.

[7] Heavy-duty vehicle is a truck or other vehicle 4 tons or greater, including the weight of the material being transferred.

Table E6
Road Dust Emissions
Buffalo Shredding and Recovery, LLC
Blasdell, New York

Road Actual Emissions Calculations

Emission Calculations

Pollutant	Emission Factor (E) (lb/VMT)	Actual Emissions (1)		Potential Emissions (1)	
		(lb/yr)	(TPY)	(lb/yr)	(TPY)
PM-30 (2)	---	47,334	24	79,690	40
Paved Roads (3)	1.00	11,768	5.9	20,031	10
Unpaved Roads (4)	4.59	35,566	18	59,660	30
PM-10	---	13,501	6.8	22,705	11
Paved Roads (3)	0.20	2,354	1.2	4,006	2.0
Unpaved Roads (4)	1.44	11,147	5.6	18,699	9.3
PM-2.5	---	1,666	0.83	2,810	1.4
Paved Roads (3)	0.05	578	0.29	983	0.49
Unpaved Roads (4)	0.14	1,089	0.54	1,826	0.91

(1) Emissions (TPY) = [Emission Factor E (lb/VMT)] x [VMT/yr] x [1 ton / 2000 lbs]

(2) Assume PM-30 = total suspended particulate matter (TSP).

(3) Based on AP-42, Chapter 13.2.1, Equation 2. $E = [k(sL)^{0.91} \times (W)^{1.02}] (1-P/4N)$

(4) Based on AP-42, Chapter 13.2.2, Equations 1a and 2. $E = k(s/12)^{a}(W/3)^{b}[(365-P)/365]$

Table E7
Torch Cutting - Actual Emissions
Buffalo Shredding and Recovery, LLC
Blasdell, New York

Subfacility ID:	Miscellaneous Emissions
Description:	Torch Cutting Fugitives

Hours of Operation [1]	8,760	man hrs.

Emission Calculations

Pollutant	**Emission Factor (lb/hr cutting time)** [2]	**Emissions (TPY)** [3]
PM/PM10/PM2.5	0.06	0.24

[1] Assumed 8,760 hours/yr.

[2] Emission factor based on Table D-5 in Institute of Scrap Recycling Industries, Inc. Title V Applicability Workbook. Washington DC: Institute of Scrap Recycling Industries, 1998.

[3] Torch cutting activities occur indoors; assume 90% of PM emissions is emitted to atmosphere and 10% of PM emissions settle inside building.
Emissions (TPY) = [Emission Factor (lb/hr cutting time)] x [Annual Process Rate (man hrs/yr)] [0.90] x [1 ton/2000 lbs]

Attachment F

Regulatory Discussion

Buffalo Shredding & Recovery, LLC
Regulatory Discussion

Tables summarizing overall applicable requirements are included as **Tables F1 through F4.** On January 22, 2025, Buffalo Shredding signed a consent order (U.S. EPA Docket No. CAA-02-2024-1211) issued by The United States Environmental Protection Agency (USEPA) Region 2. This consent order outlines several new conditions and limitations that Buffalo Shredding will operate under. The consent order is provided in **Attachment K.** Additional information regarding key state and federal regulations that apply to the Buffalo Shredding facility is discussed below.

New York State Regulations

TITLE 6 OF THE NEW YORK CODES, RULES AND REGULATIONS (6 NYCRR) SUBPART 201-5

The Buffalo Shredding facility currently operates under an Air Facility Registration (AFR) (No. 9-1448-00419/00001). Per the consent order Buffalo Shredding is seeking to cap VOC emissions to maintain State Facility Permit (SFP) status.

6 NYCRR SUBPART 201-3 EXEMPT AND TRIVIAL ACTIVITIES

As shown in **Table C1**, there are emission sources at the facility that are either exempt or trivial under 201-3.2 and 201-3.3 and are not subject to the permitting requirements provided in 6 NYCRR Part 201. In accordance with 6 NYCRR 201-3.1(b), emissions from exempt and trivial activities are required to be included in potential to emit calculations when evaluating major source status. As provided in **Attachment C** actual and potential annual emissions were estimated for most exempt emission sources at the facility.

6 NYCRR PART 212 PROCESS OPERATIONS

Part 212 applies to emission sources and/or emission points associated with a process operation. Upon submittal of a permit application, facilities must evaluate emissions from processes with respect to Part 212. In accordance with Part 212-1.2(b)(18), combustion installations are not a process operation and are not subject to Part 212. Therefore, combustion sources at the Buffalo Shredding facility have not been included in the Part 212 evaluation.

The shredding process operations at the facility are subject to Subparts 212-1 and 212-2. Ramboll has prepared a Part 212 evaluation for the Buffalo Shredding facility. This Part 212 evaluation is included as **Table F5**. Contaminants with high, medium, and low toxicity, provided in NYSDEC's *DAR-1 Guidelines for the Evaluation and Control of Ambient Air Contaminants under Part 212* (issued February 2021) were assigned an initial Environmental Rating (ER) of A, B, and C, respectively.

In accordance with 6 NYCRR 212-2.1(a) and guidance provided in NYSDEC's DAR-1, HTACs with actual annual emissions that do not exceed the corresponding MELs provided in 6 NYCRR 212-2.2 Table 2 and non-HTACs with actual annual emissions that do not exceed 100 pounds per year (lb/yr) are considered in compliance with the requirements of 6 NYCRR Part 212 and no further evaluation is necessary. As shown in **Table F5**, the actual annual emissions for each air contaminant does not exceed the MEL provided in 6 NYCRR 212-2.2 Table 2 and the 100 lb/yr threshold for non-HTACs. As such, no further evaluation is required.

6 NYCRR SUBPART 227-1 – STATIONARY COMBUSTION INSTALLATIONS

The subpart applies to stationary combustion installations, except for those subject to New Source Performance Standards (NSPSs) under Chapter 40 of the Code of Federal Regulations (40 CFR) Part 60 or National Emission Standards for Hazardous Air Pollutants (NESHAPs) under 40 CFR Part 63. Therefore, combustion sources at the facility are subject to this regulation. This regulation subject's applicable stationary combustion sources to an annual tune-up requirement.

CLIMATE LEADERSHIP AND COMMUNITY PROTECTION ACT (CLCPA)

The Climate Leadership and Community Protection Act (CLCPA), which became effective January 1, 2020, directs state agencies to assess whether the decisions they make are consistent with the Statewide greenhouse gas (GHG) emission limits established by the CLCPA in Environmental Conservation Law (ECL) Article 75. In the case of NYSDEC, this includes assessing whether permits issued are consistent with or would interfere with the attainment of the Statewide GHG emission limits in ECL Article 75.

A CLCPA analysis has been completed as part of this ASF permit application and is provided in Attachment G.

Federal Regulations

Buffalo Shredding is a minor stationary source under the New Source Review (NSR) requirements of the Federal Clean Air Act. The facility is located in Erie County, New York. All of New York State is within the ozone transport region as designated by the Act. Therefore, VOC and NOx are treated as nonattainment contaminants statewide as precursors of ozone. Non-attainment New Source Review (NNSR) is not triggered since the PTE for VOCs and NOx do not exceed the threshold for marginal nonattainment pollutants.

Metal scrap processing operations are not a listed source category under 40 CFR §52.21(b)(1); therefore, the facility would be considered a major source if attainment criteria pollutant emissions are greater than or equal to the major source threshold of 250 tons per year (tpy). The maximum annual emission rates for the attainment criteria pollutants are less than 250 tpy. Therefore, the facility will be a minor source as defined in the rules, and Prevention of Significant Deterioration (PSD) review is not triggered.

Furthermore, Title V permitting requirements are also not triggered since the Title V major source thresholds are not exceeded (100 tpy for each criteria pollutant, except VOC which is 50 tpy, 25 tpy for total hazardous air pollutants (HAPs), and 10 tpy for any single HAP). The facility is considered an area source of HAPs.

Table F1
State Applicable Requirements
Buffalo Shredding and Recovery, LLC
Blasdell, New York

6 NYCRR Part	Description	Applicable (Yes/No)
200	General Provisions	Y
200.6	Acceptable Ambient Air Quality	Y
200.7	Maintenance of Equipment	Y
201-1	General Provisions	Y
201-3	Permit Exempt/Trivial	Y
201-4	Minor Facility Registrations	N
201-5	State Facility (non-TV) Permits	Y
201-6	Title V Operating Permit	N
201-7	Federally Enforceable Emission Caps	N
202-1	Emissions Testing, Sampling and Analytical Determinations	N
202-2	Emission Statements	N
203	Repealed	N
204	Repealed	N
205	Architectural and Industrial Maintenance Coatings	N
206	State Aid For General Air Pollution Control Work, New York City	N
207	Control Measures for Air Pollution Episode	N
208	Landfill Gas Collection & Control Systems for Certain Municipal Solid Waste Landfills	N
209	Primary Aluminum Reduction Plants	N
210	Emissions and Labeling Requirements For Personal Watercraft Engines	N
211.1	Air Pollution Prohibited	Y
211.2	Visible Emissions Limited	Y
212	Process Operations	Y
213	Contaminant Emissions from Ferrous Jobbing Foundries	N
214	By-Products Coke Oven Batteries	N
215	Open fires	Y
216	Iron and Steel Processes	N
217	Motor Vehicles Emissions	Y
218	Emission Standards For Motor Vehicle Engines	N
219	Incinerators	N
220	Portland Cement and Glass Plants	N
221	Asbestos-Containing Surface Coating Material	N
222	Reserved	N
223	Petroleum Refineries	N
224	Sulfuric and Nitric Plants	N
225	Fuel Composition and Use	Y
226-1	Solvent Cleaning Processes	N
226-2	Industrial Cleaning Solvents	N
227-1.3	Stationary Combustion Installations - Particulate Emissions	Y
227-1.4	Stationary Combustion Installations - Opacity	Y
227-2	Reasonably Available Control Technology (RACT) for Major Facilities of Oxides of Nitrogen (NO_x)	N
228-1	Surface Coating Processes	N
228-2	Commercial and Industrial Adhesives, Sealants and Primers	N
229	Petroleum and Volatile Organic Liquid Storage and Transfer	N

Table F1
State Applicable Requirements
Buffalo Shredding and Recovery, LLC
Blasdell, New York

6 NYCRR Part	Description	Applicable (Yes/No)
230	Gasoline Dispensing Sites and Transport Vehicles	N
231	New Source Review for New and Modified Facilities	N
232	Perchloroethylene Dry Cleaning Facilities	N
233	Pharmaceutical and Cosmetic Manufacturing Processes	N
234	Graphic Arts	N
235	Consumer Products	N
236	Synthetic Organic Chemical Manufacturing Facility Component Leaks	N
237	Repealed	N
238	Repealed	N
239	Portable Fuel Container Spillage Control	N
240	Transportation Conformity	N
241	Asphalt Pavement and Asphalt Based Surface Coating	N
242	CO_2 Budget Trading	N
243	Repealed	N
244	Repealed	N
245	Repealed	N
246	Mercury Reduction Program for Coal-Fired Electric Utility Steam Generating Units	N
247	Outdoor Wood Boilers	N
248	Ultra Low Sulfur Diesel Fuel and Best Available Retrofit Technology for Heavy Duty Vehicles	N
249	Best Available Retrofit Technology (BART)	N
250	Miscellaneous Orders	N
251	CO_2 Performance Standards for Electric Generating Facilities	N
252-255	Repealed	N
256	Air Quality Classifications System	N
257	Air Quality Standards	N

237 Acid dep NO_x, repealed
238, Acid dep SO_2, repealed
243, 244, 245 - superceded by 40 CFR 97

Table F2
Federal Applicable Requirements - New Source Performance Standards
Buffalo Shredding and Recovery, LLC
Blasdell, New York

40 CFR 60, Subpart	Description	Applicable (Yes/No)
A	General Provisions	N
AA	Standards of Performance for Steel Plants: Electric Arc Furnaces Constructed After October 21, 1974, and On or Before August 17, 1983	N
AAa	Standards of Performance for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels Constructed After August 17, 1983	N
AAA	Standards of Performance for New Residential Wood Heaters	N
AAAA	Standards of Performance for Small Municipal Waste Combustion Units for Which Construction is Commenced After August 30, 1999 or for Which Modification or Reconstruction is Commenced After June 6, 2001	N
BB	Standards of Performance for Kraft Pulp Mills	N
BBa	Standards of Performance for Kraft Pulp Mill Affected Sources for Which Construction, Reconstruction, or Modification Commenced After May 23, 2013	N
BBB	Standards of Performance for the Rubber Tire Manufacturing Industry	N
BBBB	Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or Before August 30, 1999	N
Cb	Emissions Guidelines and Compliance Times for Large Municipal Waste Combustors That are Constructed on or Before September 20, 1994	N
Cc	Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills	N
CC	Standards of Performance for Glass Manufacturing Plants	N
CCC	Reserved	N
CCCC	Standards of Performance for Commercial and Industrial Solid Waste Incineration Units	N
Cd	Emissions Guidelines and Compliance Times for Sulfuric Acid Production Units	N
Ce	Emission Guidelines and Compliance Times for Hospital/Medical/Infectious Waste Incinerators	N
D	Standards of Performance for Fossil-Fuel-Fired Steam Generators	N
Da	Standards of Performance for Electric Utility Steam Generating Units	N
Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	N
Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	N
DD	Standards of Performance for Grain Elevators	N
DDD	Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry	N
DDDD	Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units	N
E	Standards of Performance for Incinerators	N

Table F2
Federal Applicable Requirements - New Source Performance Standards
Buffalo Shredding and Recovery, LLC
Blasdell, New York

40 CFR 60, Subpart	Description	Applicable (Yes/No)
Ea	Standards of Performance for Municipal Waste Combustors for Which Construction Is Commenced After December 20, 1989 and On or Before September 20, 1994	N
Eb	Standards of Performance for Large Municipal Waste Combustors for Which Construction is Commenced After September 20, 1994 or for Which Modification or Reconstruction is Commenced After June 19, 1996	N
Ec	Standards of Performance for New Stationary Sources: Hospital/Medical/Infectious Waste Incinerators	N
EE	Standards of Performance for Surface Coating of Metal Furniture	N
EEE	Reserved	N
EEEE	Standards of Performance for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004, or for Which Modification or Reconstruction is Commenced on or After June 16, 2006	N
F	Standards of Performance for Portland Cement Plants	N
FF	Reserved	N
FFF	Standards of Performance for Flexible Vinyl and Urethane Coating and Printing	N
FFFF	Emission Guidelines and Compliance Times for Other Solid Waste Incineration Units That Commenced Construction On or Before December 9, 2004	N
G	Standards of Performance for Nitric Acid Plants	N
Ga	Standards of Performance for Nitric Acid Plants for Which Construction, Reconstruction, or Modification Commenced After October 14, 2011	N
GG	Standards of Performance for Stationary Gas Turbines	N
GGG	Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for which Construction, Reconstruction, or Modification Commenced After January 4, 1983, and on or Before November 7, 2006	N
GGGa	Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006	N
GGGG	Reserved	N
H	Standards of Performance for Sulfuric Acid Plants	N
HH	Standards of Performance for Lime Manufacturing Plants	N
HHH	Standards of Performance for Synthetic Fiber Production Facilities	N
HHHH	111(d): Coal Fired Boilers - Hg Budget Trading	N
I	Standards of Performance for Hot Mix Asphalt Facilities	N
III	Standards of Performance for Volatile Organic Compound (VOC) Emissions From the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes	N
IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	N
J	Standards of Performance for Petroleum Refineries	N

Table F2
Federal Applicable Requirements - New Source Performance Standards
Buffalo Shredding and Recovery, LLC
Blasdell, New York

40 CFR 60, Subpart	Description	Applicable (Yes/No)
Ja	Standards of Performance for Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After May 14, 2007	N
JJJ	Standards of Performance for Petroleum Dry Cleaners	N
JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	N
K	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978	N
Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984	N
Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	N
KK	Standards of Performance for Lead-Acid Battery Manufacturing Plants	N
KKK	Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011	N
KKKK	Standards of Performance for Stationary Combustion Turbines	N
L	Standards of Performance for Secondary Lead Smelters	N
LL	Standards of Performance for Metallic Mineral Processing Plants	N
LLL	Standards of Performance for SO2 Emissions From Onshore Natural Gas Processing for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011	N
LLLL	Standards of Performance for New Sewage Sludge Incineration Units	N
M	Standards of Performance for Secondary Brass and Bronze Production Plants	N
MM	Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations	N
MMM	Reserved	N
MMMM	Emission Guidelines and Compliance Times for Existing Sewage Sludge Incineration Units	N
N	Standards of Performance for Primary Emissions from Basic Oxygen Process Furnaces for Which Construction is Commenced After June 11, 1973	N
Na	Standards of Performance for Secondary Emissions from Basic Oxygen Process Steelmaking Facilities for Which Construction is Commenced After January 20, 1983	N
NN	Standards of Performance for Phosphate Rock Plants	N

Table F2
Federal Applicable Requirements - New Source Performance Standards
Buffalo Shredding and Recovery, LLC
Blasdell, New York

40 CFR 60, Subpart	Description	Applicable (Yes/No)
NNN	Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations	N
O	Standards of Performance for Sewage Treatment Plants	N
OOO	Standards of Performance for Nonmetallic Mineral Processing Plants	N
OOOO	Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution	N
P	Standards of Performance for Primary Copper Smelters	N
PP	Standards of Performance for Ammonium Sulfate Manufacture	N
PPP	Standard of Performance for Wool Fiberglass Insulation Manufacturing Plants	N
PPPP	Reserved	N
Q	Standards of Performance for Primary Zinc Smelters	N
QQ	Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing	N
QQQ	Standards of Performance for VOC Emissions From Petroleum Refinery Wastewater Systems	N
QQQQ	Standards of Performance for New Residential Hydronic Heaters and Forced-Air Furnaces	N
R	Standards of Performance for Primary Lead Smelters	N
RR	Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations	N
RRR	Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes	N
S	Standards of Performance for Primary Aluminum Reduction Plants	N
SS	Standards of Performance for Industrial Surface Coating: Large Appliances	N
SSS	Standards of Performance for Magnetic Tape Coating Facilities	N
T	Standards of Performance for the Phosphate Fertilizer Industry: Wet-Process Phosphoric Acid Plants	N
TT	Standards of Performance for Metal Coil Surface Coating	N
TTT	Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines	N
TTTT	Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units	N
U	Standards of Performance for the Phosphate Fertilizer Industry: Superphosphoric Acid Plants	N
UU	Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture	N
UUU	Standards of Performance for Calciners and Dryers in Mineral Industries	N
V	Standards of Performance for the Phosphate Fertilizer Industry: Diammonium Phosphate Plants	N

Table F2
Federal Applicable Requirements - New Source Performance Standards
Buffalo Shredding and Recovery, LLC
Blasdell, New York

40 CFR 60, Subpart	Description	Applicable (Yes/No)
VV	Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006	N
VVa	Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006	N
VVV	Standards of Performance for Polymeric Coating of Supporting Substrates Facilities	N
W	Standards of Performance for the Phosphate Fertilizer Industry: Triple Superphosphate Plants	N
WW	Standards of Performance for the Beverage Can Surface Coating Industry	N
WWW	Standards of Performance for Municipal Solid Waste Landfills	N
X	Standards of Performance for the Phosphate Fertilizer Industry: Granular Triple Superphosphate Storage Facilities	N
XX	Standards of Performance for Bulk Gasoline Terminals	N
Y	Standards of Performance for Coal Preparation and Processing Plants	N
Z	Standards of Performance for Ferroalloy Production Facilities	N

Table F3
Federal Applicable Requirements - National Emission Standards for Hazardous Air Pollutants
Buffalo Shredding and Recovery, LLC
Blasdell, New York

40 CFR 63, Subpart	Description	Applicable (Yes/No)
A	General Provisions	N
AA	National Emission Standards for Hazardous Air Pollutants From Phosphoric Acid Manufacturing Plants	N
AAA	[Reserved]	N
AAAA	National Emission Standard for Hazardous Air Pollutants: Municipal Solid Waste Landfills	N
AAAAA	National Emission Standard for Hazardous Air Pollutants for Lime Manufacturing Plants	N
AAAAAA	[Reserved]	N
AAAAAAA	National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing	N
BB	National Emission Standards for Hazardous Air Pollutants From Phosphate Fertilizers Production Plants	
BBB	[Reserved]	N
BBBBB	National Emission Standard for Hazardous Air Pollutants for Semiconductor Manufacturing	N
BBBBBB	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities	N
BBBBBBB	National Emission Standards for Hazardous Air Pollutants for Area Sources: Chemical Preparations Industry	N
CC	National Emission Standards for Hazardous Air Pollutants From Petroleum Refineries	N
CCC	National Emission Standards for Hazardous Air Pollutants for Steel Pickling--HCl Process Facilities and Hydrochloric Acid Regeneration Plants	N
CCCC	National Emission Standard for Hazardous Air Pollutants: Manufacturing of Nutritional Yeast	N
CCCCC	National Emission Standard for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks	N
CCCCCC	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities	N
CCCCCCC	National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing	N
DD	National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations	N
DDD	National Emission Standards for Hazardous Air Pollutants for Mineral Wool Production	N
DDDD	National Emission Standard for Hazardous Air Pollutants: Plywood and Composite Wood Products	N
DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters	N
DDDDDD	National Emission Standards for Hazardous Air Pollutants for Polyvinyl Chloride and Copolymers Production Area Sources	N

Table F3
Federal Applicable Requirements - National Emission Standards for Hazardous Air Pollutants
Buffalo Shredding and Recovery, LLC
Blasdell, New York

40 CFR 63, Subpart	Description	Applicable (Yes/No)
DDDDDDD	National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Prepared Feeds Manufacturing	N
EE	National Emission Standards for Magnetic Tape Manufacturing Operations	N
EEE	National Emission Standard for Hazardous Air Pollutants from Hazardous Waste Combustors	N
EEEE	National Emission Standard for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)	N
EEEEE	National Emission Standard for Hazardous Air Pollutants for Iron and Steel Foundries	N
EEEEEE	National Emission Standards for Hazardous Air Pollutants for Primary Copper Smelting Area Sources	N
EEEEEEE	National Emission Standards for Hazardous Air Pollutants: Gold Mine Ore Processing and Production Area Source Category	N
F	National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry	N
G	National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry Process Vents, Storage Vessels, Transfer Operations, and Wastewater	N
H	National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks	N
I	National Emission Standards for Organic Hazardous Air Pollutants for Certain Processes Subject to the Negotiated Regulation for Equipment Leaks	N
FF	[Reserved]	N
FFF	[Reserved]	N
FFFF	National Emission Standard for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing	N
FFFFF	National Emission Standard for Hazardous Air Pollutants for Integrated Iron and Steel Manufacturing Facilities	N
FFFFFF	National Emission Standards for Hazardous Air Pollutants for Secondary Copper Smelting Area Sources	N
GG	National Emission Standards for Aerospace Manufacturing and Rework Facilities	N
GGG	National Emission Standards Pharmaceuticals Production	N
GGGG	National Emission Standard for Hazardous Air Pollutants: Solvent Extractions for Vegetable Oil Production	N
GGGGG	National Emission Standard for Hazardous Air Pollutants: Site Remediation	N
GGGGGG	National Emission Standards for Hazardous Air Pollutants for Primary Nonferrous Metals Area Sources—Zinc, Cadmium, and Beryllium	N
HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities	N

Table F3
Federal Applicable Requirements - National Emission Standards for Hazardous Air Pollutants
Buffalo Shredding and Recovery, LLC
Blasdell, New York

40 CFR 63, Subpart	Description	Applicable (Yes/No)
HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities	N
HHH	National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities	N
HHHH	National Emission Standard for Hazardous Air Pollutants for Wet-Formed Fiberglass Mat Production	N
HHHHH	National Emission Standard for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing	N
HHHHHH	National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources	N
HHHHHHH	National Emission Standards for Hazardous Air Pollutant Emissions for Polyvinyl Chloride and Copolymers Production	N
II	National Emission Standards for Shipbuilding and Ship Repair (Surface Coating)	N
III	National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production	N
IIII	National Emission Standard for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks	N
IIIII	National Emission Standard for Hazardous Air Pollutants: Mercury Emissions From Mercury Cell Chlor-Alkali Plants	N
IIIIII	[Reserved]	N
J	National Emission Standards for Hazardous Air Pollutants for Polyvinyl Chloride and Copolymers Production	N
JJ	National Emission Standards for Wood Furniture Manufacturing Operations	N
JJJ	National Emission Standard for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins	N
JJJJ	National Emission Standard for Hazardous Air Pollutants: Paper and Other Web Coating	N
JJJJJ	National Emission Standard for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing	N
JJJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources	N
K	[Reserved]	N
KK	National Emission Standard for the Printing and Publishing Industry	N
KKK	[Reserved]	N
KKKK	National Emission Standard for Hazardous Air Pollutants: Surface Coating of Metal Cans	N
KKKKK	National Emission Standard for Hazardous Air Pollutants for Clay Ceramics Manufacturing	N
L	National Emission Standards for Coke Oven Batteries	N

Table F3
Federal Applicable Requirements - National Emission Standards for Hazardous Air Pollutants
Buffalo Shredding and Recovery, LLC
Blasdell, New York

40 CFR 63, Subpart	Description	Applicable (Yes/No)
LL	National Emission Standard for Hazardous Air Pollutants for Primary Aluminum Reduction Plants	N
LLL	National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry	N
LLLLL	National Emission Standard for Hazardous Air Pollutants: Asphalt Processing and Asphalt Roofing Manufacturing	N
LLLLLL	National Emission Standards for Hazardous Air Pollutants for Acrylic and Modacrylic Fibers Production Area Sources	N
M	National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities	N
MM	National Emission Standard for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills	N
MMM	National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production	N
MMMM	National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products	N
MMMMM	National Emission Standard for Hazardous Air Pollutants: Flexible Polyurethane Foam Fabrication Operations	N
MMMMMM	National Emission Standards for Hazardous Air Pollutants for Carbon Black Production Area Sources	N
N	National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks	N
NN	National Emission Standards for Hazardous Air Pollutants for Wool Fiberglass Manufacturing at Area Sources	N
NNN	National Emission Standards for Hazardous Air Pollutants for Wool Fiberglass Manufacturing	N
NNNN	National Emission Standard for Hazardous Air Pollutants: Surface Coating of Large Appliances	N
NNNNN	National Emission Standard for Hazardous Air Pollutants: Hydrochloric Acid Production	N
NNNNNN	National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources: Chromium Compounds	N
O	Ethylene Oxide Emissions Standards for Sterilization Facilities	N
OO	National Emission Standards for Tanks - Level 1	N
OOO	National Emission Standards for Hazardous Air Pollutants Emissions: Manufacture of Amino/Phenolic Resins	N
OOOO	National Emission Standard for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles	N
OOOOO	[Reserved]	N
OOOOOO	National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources	N

Table F3
Federal Applicable Requirements - National Emission Standards for Hazardous Air Pollutants
Buffalo Shredding and Recovery, LLC
Blasdell, New York

40 CFR 63, Subpart	Description	Applicable (Yes/No)
P	[Reserved]	N
PP	National Emission Standards for Containers	N
PPP	National Emission Standards for Hazardous Air Pollutants Emissions for Polyether Polyols Production	N
PPPP	National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products	N
PPPPP	National Emission Standard for Hazardous Air Pollutants for Engine Test Cells/Stands	N
PPPPPP	National Emission Standards for Hazardous Air Pollutants for Lead Acid Battery Manufacturing Area Sources	N
Q	National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers	N
QQ	National Emission Standards for Surface Impoundments	N
QQQ	National Emission Standards for Hazardous Air Pollutants for Primary Copper Smelting	N
QQQQ	National Emission Standard for Hazardous Air Pollutants: Surface Coating of Wood Building Products	N
QQQQQ	National Emission Standard for Hazardous Air Pollutants for Friction Materials Manufacturing Facilities	N
QQQQQQ	National Emission Standards for Hazardous Air Pollutants for Wood Preserving Area Sources	N
R	National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)	N
RR	National Emission Standards for Individual Drain Systems	N
RRR	National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production	N
RRRR	National Emission Standard for Hazardous Air Pollutants: Surface Coating of Metal Furniture	N
RRRRR	National Emission Standard for Hazardous Air Pollutants: Taconite Iron Ore Processing	N
RRRRRR	National Emission Standards for Hazardous Air Pollutants for Clay Ceramics Manufacturing Area Sources	N
S	National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry	N
SS	National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process	N
SSS	[Reserved]	N
SSSS	National Emission Standard for Hazardous Air Pollutants: Surface Coating of Metal Coil	N
SSSSS	National Emission Standard for Hazardous Air Pollutants for Refractory Products Manufacturing	N
SSSSSS	National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources	N
T	National Emission Standards for Halogenated Solvent Cleaning	N

Table F3
Federal Applicable Requirements - National Emission Standards for Hazardous Air Pollutants
Buffalo Shredding and Recovery, LLC
Blasdell, New York

40 CFR 63, Subpart	Description	Applicable (Yes/No)
TT	National Emission Standards for Equipment Leaks - Control Level 1	N
TTT	National Emission Standards for Hazardous Air Pollutants for Primary Lead Smelting	N
TTTT	National Emission Standard for Hazardous Air Pollutants for Leather Finishing Operations	N
TTTTT	National Emission Standard for Hazardous Air Pollutants for Primary Magnesium Refining	N
TTTTTT	National Emission Standards for Hazardous Air Pollutants for Secondary Nonferrous Metals Processing Area Sources	N
U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins	N
UU	National Emission Standards for Equipment Leaks - Control Level 2 Standards	N
UUU	National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units.	N
UUUU	National Emission Standard for Hazardous Air Pollutants for Cellulose Products Manufacturing	N
UUUUU	National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units	N
UUUUUU	[Reserved]	N
V	[Reserved]	N
VV	National Emission Standards for Oil-Water Separators and Organic-Water Separators	N
VVV	National Emission Standard for Hazardous Air Pollutants: Publicly Owned Treatment Works	N
VVVV	National Emission Standard for Hazardous Air Pollutants for Boat Manufacturing	N
VVVVV	[Reserved]	N
VVVVVV	National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources	N
W	National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non-Nylon Polyamides Production	N
WW	National Emission Standards for Storage Vessels (Tanks) - Control Level 2	N
WWW	[Reserved]	N
WWWW	National Emission Standard for Hazardous Air Pollutants: Reinforced Plastic Composites Production	N
WWWWW	National Emission Standards for Hospital Ethylene Oxide Sterilizers	N
WWWWWW	National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations	N
X	National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting	N
XX	National Emission Standards For Ethylene Manufacturing Process Units: Heat Exchange Systems and Waste Operations	N

Table F3
Federal Applicable Requirements - National Emission Standards for Hazardous Air Pollutants
Buffalo Shredding and Recovery, LLC
Blasdell, New York

40 CFR 63, Subpart	Description	Applicable (Yes/No)
XXX	National Emission Standards for Hazardous Air Pollutants for Ferroalloys Production: Ferromanganese and Silicomanganese	N
XXXX	National Emission Standard for Hazardous Air Pollutants: Rubber Tire Manufacturing	N
XXXXX	[Reserved]	N
XXXXXX	National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories	N
Y	National Emission Standards for Marine Tank Vessel Loading Operations	N
YY	National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic Maximum Achievable Control Technology Standards	N
YYYY	National Emission Standard for Hazardous Air Pollutants for Stationary Combustion Turbines	N
YYYYY	National Emission Standard for Hazardous Air Pollutants for Area/Sources: Electric Arc Furnace Steelmaking Facilities	N
YYYYYY	National Emission Standards for Hazardous Air Pollutants for Area Sources: Ferroalloys Production Facilities	N
Z	[Reserved]	N
ZZ	[Reserved]	N
ZZZZ	National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	N
ZZZZZ	National Emission Standard for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources	N
ZZZZZZ	National Emission Standards for Hazardous Air Pollutants Area Source Standards for Aluminum, Copper, and Other Nonferrous Foundries	N

Table F4
Federal Applicable Requirements
Buffalo Shredding and Recovery, LLC
Blasdell, New York

40 CFR Part	Description	Applicable (Yes/No)
64	Compliance Assurance Monitoring	N
65	Consolidated Federal Air Rule	N
66	Assessment and Collection of Noncompliance Penalties by EPA	N
67	EPA Approval of State Noncompliance Penalty Program	N
68	Chemical Accident Prevention Provisions	N
69	Special Exemptions from Requirements of the Clean Air Act	N
70	State Operating Permit Programs	Y
71	Federal Operating Permit Programs	N
72	Permits Regulation	N
73	Sulfur Dioxide Allowance System	N
74	Sulfur Dioxide Opt-Ins	N
75	Continuous Emission Monitoring	N
76	Acid Rain Nitrogen Oxides Emission Reduction Program	N
77	Excess Emissions	N
78	Appeal Procedures	N
79	Registration of Fuels and Fuel Additives	N
80	Registration of Fuels and Fuel Additives	Y
81	Designation of Areas for Air Quality Planning Purposes	N
82	Protection of Stratospheric Ozone	N
83	Reserved	N
84	Reserved	N
85	Control of Air Pollution from Mobile Sources	N
86	Control of Emissions from New and In-Use Highway Vehicles and Engines	N
87	Control of Air Pollution from Aircraft and Aircraft Engines	N
88	Clean-Fuel Vehicles	N
89	Control of Emissions from New and In-Use Nonroad Compression-Ignition Engines	N
90	Control of Emissions from Nonroad Spark-Ignition Engines at or Below 19 Kilowatts	N
91	Control of Emissions from Marine Spark-Ignition Engines	N
92	Control of Air Pollution from Locomotives and Locomotive Engines	N
93	Determining Conformity of Federal Actions to State or Federal Implementation Plans	N
94	Control of Emissions from Marine Compression-Ignition Engines	N
95	Mandatory Patent Licenses	N
96	NO_x Budget Trading Program and CAIR NO_x and SO_2 Trading Programs for State Implementation Plans	N
97	Federal NO_x Budget Trading Program and CAIR NO_x and SO_2 Trading Programs	N
98	Mandatory Greenhouse Gas Reporting	N

Table F5
Part 212 Evaluation
Buffalo Shredding and Recovery, LLC
Blasdell, New York

Sources and Pollutants	CAS Number	DAR-1 Toxicity[1]	Proposed Environmental Rating[2]	HTAC[3] (Y/N)	HTAC Mass Emission Limit[3] (lb/yr)	PB Trigger[4] (Y/N)	Pre-Control Hourly Emissions (lb/hr)	Post-Control Hourly Emissions (lb/hr)	Facility-Wide Annual Actual Emissions (lb/yr)	Part 212 Requirement	Modeling Required (Yes/No)
Shredder Z-Box EP											
Acetone	00067-64-1	L	C	N	---	N	1.0E-03	1.0E-03	2.7	Table 4, C-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Benzene	00071-43-2	H	A	Y	100	N	3.0E-02	3.0E-02	80	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
1,1,1 - Trichloroethane	00071-55-6	L	C	N	---	N	1.5E-02	1.5E-02	40	Table 4, C-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Methylene Chloride	00075-09-2	M	B	N	---	N	4.5E-03	4.5E-03	12	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
1,1-Dichloroethene	00075-35-4	M	B	Y	---	N	1.0E-03	1.0E-03	2.7	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Methyl Ethyl Ketone	00078-93-3	M	B	N	---	N	4.0E-04	4.0E-04	1.1	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Trichloroethene	00079-01-6	H	A	Y	500	N	5.0E-03	5.0E-03	13	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 500 lb/yr = No Modeling Required	No
Ethylbenzene	00100-41-4	M	B	N	---	N	5.0E-03	5.0E-03	13	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Styrene	00100-42-5	M	B	N	---	N	1.0E-03	1.0E-03	2.7	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Toluene	00108-88-3	L	C	N	---	N	2.5E-02	2.5E-02	66	Table 4, C-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Tetrachloroethene	00127-18-4	H	A	Y	1,000	N	2.0E-04	2.0E-04	0.53	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 1,000 lb/yr = No Modeling Required	No
Total Xylenes[5]	01330-20-7	M	B	N	---	N	1.5E-02	1.5E-02	40	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Lead	07439 92 1	H	A	Y	5	Y	5.9E-04	5.9E-04	1.6	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 5 lb/yr = No Modeling Required	No
Cadmium	07440-43-9	H	A	Y	1	Y	8.7E-05	8.7E-05	0.23	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 1 lb/yr = No Modeling Required	No
Chromium	07440-47-3	H	A	Y	250	N	9.6E-05	9.6E-05	0.26	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 250 lb/yr = No Modeling Required	No
Shredder J-Box EP											
Acetone	00067-64-1	L	C	N	---	N	1.0E-03	1.0E-03	2.7	Table 4, C-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Benzene	00071-43-2	H	A	Y	100	N	3.0E-02	3.0E-02	80	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
1,1,1 - Trichloroethane	00071-55-6	L	C	N	---	N	1.5E-02	1.5E-02	40	Table 4, C-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Methylene Chloride	00075-09-2	M	B	N	---	N	4.5E-03	4.5E-03	12	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
1,1-Dichloroethene	00075-35-4	M	B	Y	---	N	1.0E-03	1.0E-03	2.7	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Methyl Ethyl Ketone	00078-93-3	M	B	N	---	N	4.0E-04	4.0E-04	1.1	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Trichloroethene	00079-01-6	H	A	Y	500	N	5.0E-03	5.0E-03	13	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 500 lb/yr = No Modeling Required	No
Ethylbenzene	00100-41-4	M	B	N	---	N	5.0E-03	5.0E-03	13	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Styrene	00100-42-5	M	B	N	---	N	1.0E-03	1.0E-03	2.7	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Toluene	00108-88-3	L	C	N	---	N	2.5E-02	2.5E-02	66	Table 4, C-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Tetrachloroethene	00127-18-4	H	A	Y	1,000	N	2.0E-04	2.0E-04	0.53	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 1,000 lb/yr = No Modeling Required	No
Total Xylenes[5]	01330-20-7	M	B	N	---	N	1.5E-02	1.5E-02	40	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No

Table F5
Part 212 Evaluation
Buffalo Shredding and Recovery, LLC
Blasdell, New York

Sources and Pollutants	CAS Number	DAR-1 Toxicity[1]	Proposed Environmental Rating[2]	HTAC[3] (Y/N)	HTAC Mass Emission Limit[3] (lb/yr)	PB Trigger[4] (Y/N)	Pre-Control Hourly Emissions (lb/hr)	Post-Control Hourly Emissions (lb/hr)	Facility-Wide Annual Actual Emissions (lb/yr)	Part 212 Requirement	Modeling Required (Yes/No)
Lead	07439 92 1	H	A	Y	5	Y	5.9E-04	5.9E-04	1.6	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 5 lb/yr = No Modeling Required	No
Cadmium	07440-43-9	H	A	Y	1	Y	8.7E-05	8.7E-05	0.23	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 1 lb/yr = No Modeling Required	No
Chromium	07440-47-3	H	A	Y	250	N	9.6E-05	9.6E-05	0.26	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 250 lb/yr = No Modeling Required	No
Fugitive Sources											
Acetone	00067-64-1	L	C	N	---	N	2.0E-03	2.0E-03	2.7	Table 4, C-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Benzene	00071-43-2	H	A	Y	100	N	6.0E-02	6.0E-02	80	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
1,1,1 - Trichloroethane	00071-55-6	L	C	N	---	N	3.0E-02	3.0E-02	40	Table 4, C-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Methylene Chloride	00075-09-2	M	B	N	---	N	9.0E-03	9.0E-03	12	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
1,1-Dichloroethene	00075-35-4	M	B	Y	---	N	2.0E-03	2.0E-03	2.7	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Methyl Ethyl Ketone	00078-93-3	M	B	N	---	N	8.0E-04	8.0E-04	1.1	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Trichloroethene	00079-01-6	H	A	Y	500	N	1.0E-02	1.0E-02	13	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 500 lb/yr = No Modeling Required	No
Ethylbenzene	00100-41-4	M	B	N	---	N	1.0E-02	1.0E-02	13	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Styrene	00100-42-5	M	B	N	---	N	2.0E-03	2.0E-03	2.7	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Toluene	00108-88-3	L	C	N	---	N	5.0E-02	5.0E-02	66	Table 4, C-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Tetrachloroethene	00127-18-4	H	A	Y	1,000	N	4.0E-04	4.0E-04	0.53	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 1,000 lb/yr = No Modeling Required	No
Total Xylenes[5]	01330-20-7	M	B	N	---	N	3.0E-02	3.0E-02	40	Table 4, B-Rated; ERP < 10 lb/hr = No Control Required; Annual Emissions < 100 lb/yr = No Modeling Required	No
Lead	07439 92 1	H	A	Y	5	Y	1.2E-03	1.2E-03	1.6	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 5 lb/yr = No Modeling Required	No
Cadmium	07440-43-9	H	A	Y	1	Y	1.7E-04	1.7E-04	0.23	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 1 lb/yr = No Modeling Required	No
Chromium	07440-47-3	H	A	Y	250	N	1.9E-04	1.9E-04	0.26	Table 4, A-Rated; ERP < 0.1 lb/hr = No Control Required; Annual Emissions < 250 lb/yr = No Modeling Required	No

Notes:

(1) Toxicity as provided in the NYSDEC AGC/SGC Tables included in DAR-1 (February 2021). Contaminants that are not listed in DAR-1 are indicated by "NL".

(2) Proposed Environmental Ratings are based on the toxicity ratings given in DAR-1. Contaminants without a toxicity rating were assigned an initial rating of "B".

(3) High Toxicity Air Contaminants (HTACs) and Mass Emission Limits listed in Table 2 of 6 NYCRR 212-2.2.

(4) Contaminants with a PB Trigger identified in Part 212-2.2 Table 2 are indicated here.

(5) Emissions of individual xylene isomers were combined and compared to 01330-20-7 in DAR-1 for this Part 212 evaluation.

Attachment G

Climate Leadership and Community Protection Act

Buffalo Shredding and Recovery, LLC
Blasdell, New York

Climate Leadership and Community Protection Act (CLCPA) Evaluation

Background

The CLCPA, which became effective January 1, 2020, directs state agencies to evaluate whether the decisions they make are consistent with the Statewide greenhouse gas (GHG) emission limits established by the CLCPA in Environmental Conservation Law (ECL) Article 75. In the case of New York State Department of Environmental Conservation (NYSDEC), this includes evaluating whether permits issued are consistent with or would interfere with the attainment of the Statewide GHG emission limits in Environmental Conservation Law (ECL) Article 75.

In December 2022, NYSDEC finalized *DAR-21 – The Climate Leadership and Community Protection Act (CLCPA) and Air Permit Applications* (DAR-21). In accordance with DAR-21, the policy applies to new and modified Air State Facility (ASF) Permits and ASF permit renewals. DAR-21 states that the portions of the project that are subject to analysis includes any new or modified emission sources that have the potential to emit GHGs, including increases and decreases in emissions of GHGs from existing equipment. In addition, the project scope includes any upstream, downstream, and indirect emissions known to be attributable to the project, including upstream out-of-state emissions from fossil fuel production, transmission, and imported electricity. The guidance also states that a project that would not lead to an increase in actual or potential GHG emissions would in most circumstances be considered consistent with the CLCPA.

In accordance with DAR-21, a CLCPA evaluation for the Blasdell facility is required to include the following:

- Estimates of actual and potential annual greenhouse gas (GHG) emissions from the facility
- Estimates of "upstream" out-of-state GHG emissions associated with use of fossil fuels imported into the State.
- Estimates of projected GHG emissions for years 2030 and 2050, if possible
- Discussion of the facility's efforts and existing measures to reduce GHG emissions from the emission sources at the facility.

Based on the CLCPA guidance, actual emissions are defined as the highest 24-month average GHG emissions during the five years preceding the permit application unless another period is more representative. Since the Blasdell facility is located outside of an area designated as a Disadvantaged Community (DAC) and pursuant to communications with the NYSDEC Division of Environmental Permits (DEP), it is Ramboll's understanding that this project is not expected to affect a disadvantaged community and no further analysis related to the DAC is required.

The following sections outline the information listed above.

GHG Emissions Estimates

The Blasdell facility operate one source of direct GHG emissions, specifically the single 350,000 Btu/hr clean burn unit. A summary of the facility-wide actual and potential annual GHG emissions (*i.e.,* direct) from this source for the years 2020-2024 is included as **Table G1**.

The GHG emissions estimates were completed based on the following:

- Carbon dioxide (CO_2), methane (CH_4) and nitrous oxide (N_2O) emission factors provided in 40 CFR Part 98 – Mandatory Greenhouse Gas Reporting Rule (Part 98)
- 20-year global warming potentials (GWPs) provided by the Intergovernmental Panel on Climate Change (IPCC) and in Title 6 of the New York Codes, Rules and Regulations (6 NYCRR) Part 496.5.
- Actual and potential used oil consumption

Buffalo Shredding does not anticipate an increase in the current facility operations for the clean burn unit over the next 10-15 years and the current GHG emissions are expected to remain stable through 2050. Therefore, the projected GHG emissions for 2030 and 2050 were assumed to be equal to the highest annual GHG emissions over the last five years.

Measures Taken to Mitigate and Reduce GHG Emissions
The facility strives to minimize GHG emissions from the clean burn unit by maintaining the unit in accordance with manufacturer's recommendations.

Table G1
Current Operation Greenhouse Gas (GHG) Emissions Summary
Buffalo Shredding and Recovery, LLC
Blasdell, New York

Contaminant	CAS No.	High Heat Value[1] (MMBtu/Unit)	Emission Factor[2] (kg/MMBtu)	20-Year GWP[3]	Annual Actual Emissions[4] (MT/yr) 2019	2020	2021	2022	2023	Maximum 24-Month Average Emissions[5] (MT/yr)	Potential Emissions[6] (MT/yr)	2030 Emissions[7] (MT/yr)	2050 Emissions[7] (MT/yr)
Direct GHGs[8]													
Used Oil (gal)					**1500**	**1500**	**1500**	**1500**	**1500**	**1,500**	**21,900**	**1,500**	**1,500**
Carbon Dioxide (CO_2)	124-38-9	0.138	74	1	15.3	15.3	15.3	15.3	15.3	15.3	224	15.3	15.3
Methane (CH_4)	74-82-8	0.138	3.0E-03	84	6.2E-04	6.2E-04	6.2E-04	6.2E-04	6.2E-04	6.2E-04	9.1E-03	6.2E-04	6.2E-04
Nitrous Oxide (N_2O)	10024-97-2	0.138	6.0E-04	264	1.2E-04	1.2E-04	1.2E-04	1.2E-04	1.2E-04	1.2E-04	1.8E-03	1.2E-04	1.2E-04
CO_2e	--		---	---	15.4	15.4	15.4	15.4	15.4	15.4	225	15.4	15.4

Notes:

(1) High Heat Values are based on the 2023 NYS Statewide GHG Emissions Report, Appendix A: Emission Factors for Use by State Agencies and Applicants.

(2) Direct GHG emission factors are based on 40 CFR 98 Subpart C.

(3) Global Warming Potentials are based on 6 NYCRR 496.5.

(4) Emissions are calculated based on estimated annual fuel use provided by the facility, the high heat value for the fuel, and the emission factor.

Actual Annual Emissions (MT/yr) = Annual Fuel Use (Unit/yr) x High Heat Value (MMBtu/Unit) x Emission Factor (kg/MMBtu) / 1,000 (kg/MT).

CO_2e Emissions (Mt/yr) = (CO_2 Emissions (MT/yr) x CO_2 20-Year GWP) + (CH_4 Emissions (MT/yr) x CH_4 20-Year GWP) + (N_2O Emissions (MT/yr) x N_2O 20-Year GWP).

(5) Maximum 24-Month Average Emissions are calculated using the maximum fuel of the 24-month averages.

(6) Potential Emissions (MT/yr) = Potential Fuel Use (Unit/yr) x High Heat Value (MMBtu/Unit) x Emission Factor (kg/MMBtu) / 1,000 (kg/MT).

(7) 2030 and 2050 emissions are assumed to be equal to the Maximum 24-Month Average Emissions.

(8) Used oil is reclaimed from scrap vehicles on site and thus no upstream emissions are generated in obtaining the fuel. Therefore, upstream emissions from the facility were not quantified.

Attachment H

Long Environmental Assessment Form (t*o be provided under separate cover*)

Attachment I

Public Participation Plan (*to be provided under separate cover*)

Attachment J

Consent Order

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

In the Matter of: Buffalo Shredding and Recovery, LLC Blasdell, New York Respondent, In a proceeding under Section 113(a) of the Clean Air Act, 42 U.S.C. § 7413(a)	**ADMINISTRATIVE COMPLIANCE ORDER ON CONSENT** CAA-02-2024-1211

A. Preliminary Statement

1. This Administrative Compliance Order on Consent ("Order") is issued under the authority vested in the Administrator of the U. S. Environmental Protection Agency ("EPA") by Section 113(a) of the Clean Air Act (the "Act," or "CAA"), 42 U.S.C. § 7413(a).

2. On the EPA's behalf, Kathleen Anderson, Director of the Enforcement and Compliance Assurance Division ("ECAD"), is delegated the authority to issue this Order under Section 113(a) of the Act.

3. Respondent is Buffalo Shredding and Recovery, LLC ("Respondent" or Buffalo Shredding"), a company doing business in Blasdell, New York. Respondent is the owner and/or operator of the scrap metal shredding facility located at 3175 Lake Shore Road, Blasdell, NY 14219-1407 (the "Facility"). Respondents is a "person" as defined in Section 302(e) of the Act, 42 US.C. § 7602(e).

4. EPA alleges that Buffalo Shredding violated the New York State Implementation Plan ("SIP"), along with the CAA and its implementing regulations promulgated under the CAA. The alleged violations occurred at the Facility. EPA alleges that:

a. Respondent's failure to operate the Facility's metal shredder with volatile organic compounds ("VOC") controls that meet the applicable requirements in the reasonably available control technology ("RACT") regulations is a violation of 6 N.Y.C.R.R. § 212-3.1, as approved into the SIP.

b. Respondent has operated and continues to operate the Facility with a potential to emit in excess of fifty (50) tons per year of VOC without obtaining and maintaining the required permits or federally enforceable permit conditions limiting emissions of VOCs in violation of 6 N.Y.C.R.R. Part 201, Subpart 201-6, as approved into the SIP, and Section 502 of the Act.

5. The violations alleged by EPA are set forth in detail in Section D of this Order, entitled "Alleged Violations of Law."

6. Respondent signs this Order on consent.

7. In satisfaction of the notice requirements of Section 113(a) of the CAA § 42 U.S.C. § 7413(a), on June 8, 2023, EPA issued Respondent a Notice of Violation ("NOV"), providing a copy to New York State Department of Environmental Protection ("NYSDEC"), providing notice that EPA found that Respondent committed the alleged violations described above and in Section C of this Agreement and providing Respondent an opportunity to confer with EPA. On July 14, 2023, and subsequently thereafter, representatives of Respondent and the EPA discussed the June 8, 2023, NOV.

B. Statutory and Regulatory Background

8. Section 113 of the Act, 42 U.S.C. § 7413, authorizes the EPA Administrator to, among other actions, to take action to ensure that air pollution sources comply with all federally

applicable air pollution control requirements. This includes requirements promulgated by the EPA and those contained in federally enforceable State Implementation Plans ("SIPs") or permits.

9. Pursuant to EPA Delegation of Authority 7-6-A and EPA, Region 2 Delegation of Authority 7-6-A, the authority to make findings of a violation and to issue a CAA Section 113(a) Compliance Order has been delegated to the Director by the EPA, Administrator through the Region 2, Regional Administrator.

10. Pursuant to EPA Delegation of Authority 7-8 and EPA, Region 2 Delegation of Authority 7-8, the EPA, Administrator's information gathering authority under CAA Section 114 has been delegated to the Director by the EPA Administrator through the Region 2, Regional Administrator.

11. Section 302(e) of the Act, 42 U.S.C. § 7602(e), provides that whenever "person" is used in the Act, the term includes an individual, corporation, partnership, association, state, municipality, political subdivision of a state, and any agency, department, or instrumentality of the United States and any officer, agent, or employee thereof.

12. Section 109 of the CAA directs the EPA, Administrator to promulgate regulations establishing national ambient air quality standards ("NAAQS") for each air pollutant for which air quality criteria have been issued pursuant to Section 108 of the Act. *See* 42 U.S.C. § 7409.

13. EPA has designated ozone as an ambient air pollutant and has established a NAAQS therefor. *See* 40 C.F.R. § 50.9. Ground-level ozone is the primary ingredient in smog and is created by chemical reactions between oxides of nitrogen and volatile organic compounds

("VOC"). This happens in the presence of sunlight. To control ozone formation, therefore, EPA and the states have generally sought to control VOC and nitrogen oxide emissions.

14. Section 110(a)(1) of the CAA requires each state to adopt and submit to EPA for approval a plan that provides for the implementation, maintenance, and enforcement of each of the NAAQS. Such plans, once approved by EPA, are known as State Implementation Plans, or SIPs. *See* 42 U.S.C. § 7410(a)(1).

15. SIPs are federally enforceable pursuant to Sections 113(a) and (b) of the Act. *See* 42 U.S.C. §§ 7413(a) and (b).

16. Section 184 of the Act, 42 U.S.C. § 7511c, designates Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, and the Consolidated Metropolitan Statistical Area that includes the District of Columbia, as a single "ozone transport region." Because New York is part of a designated ozone transport region, it must submit for approval a state implementation plan that uses RACT to control VOC emissions, and any stationary source, located outside the NYC Metropolitan Area, that emits or has the potential to emit at least fifty (50) tons per year of VOC shall be considered a major stationary source. *See* 42 U.S.C. §§ 7511c(a), (b)(1)(B) & (b)(2).

State of New York SIP Requirements (VOC RACT)

17. 40 C.F.R. § 51.100(s), which applies to SIPs, defines VOC as, in relevant part, "any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions."

18. The New York SIP VOC RACT provisions have been federally approved by the EPA. *See, e.g.,* 73 Fed. Reg. 21548 (April 22, 2008); 84 Fed. Reg. 38878 (Aug. 8, 2019); 86 Fed. Reg. 54375 (Oct. 1, 2021).

19. At all times relevant to this Consent Agreement, the federally approved SIP for the State of New York has included 6 N.Y.C.R.R. Part 200 ("General Provisions"). Specifically, the New York SIP has included approved versions of, *inter alia*, 6 N.Y.C.R.R. §§§ 200.1, 200.6, and 200.7.

20. At all times relevant to this Consent Agreement, the General Provisions at 6 N.Y.C.R.R. § 200.1 have included the following definitions:

a. "Air contaminant or air pollutant" means: "A chemical, dust, compound, fume, gas, mist, odor, smoke, vapor, pollen or any combination thereof." *Id.* § 200.1(d).

b. "Air contamination source or emissions source" means: "Any apparatus, contrivance or machine capable of causing emission of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. Where a process at an emission unit uses more than one apparatus, contrivance or machine in combination, the combination may be considered a single emission source." *Id.* § 200.1(f).

c. "Ozone Transport Region" includes all of New York State. *Id.* § 200.1(bd).

d. "Person" means: "Any individual, public or private corporation, political subdivision, government agency, department or bureau of the State, municipality, industry, co-partnership, association, firm, trust, estate or any other legal entity whatsoever." *Id.* § 200.1(bi).

e. "Potential to emit" means in pertinent part: "the maximum capacity of an air contamination source to emit any regulated air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the emission source to emit a regulated air pollutant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount of material combusted, stored, or processed, shall be treated as a part of the design if the limitation is enforceable by the department and the administrator. Fugitive emissions, to the extent that they are quantifiable, are included in determining the potential to emit where required by an applicable requirement." *Id.* § 200.1(bl).

f. "Reasonably available control technology (RACT)" means: "Lowest emission limit that a particular source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility." *Id.* § 200.1(bq).

21. At all times relevant to this Consent Agreement, the federally approved SIP for the State of New York has included 6 N.Y.C.R.R. Part 212-3 ("Reasonably Available Control Technology for Major Facilities").

22. Pursuant to 6 N.Y.C.R.R. § 212-3.1(a)(2), owners and/or operators of facilities, located outside of the Lower Orange County towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick, and Woodbury and the New York City metropolitan area, with an annual potential to emit of one hundred (100) tons or more of NO_x or fifty (50) tons or more of VOCs must comply with the requirements of 6 N.Y.C.R.R. § 212-3.1.

23. Pursuant to 6 N.Y.C.R.R. § 212-3.1(b), owners and/or operators of emission points subject to 6 N.Y.C.R.R. Part 212 that emit NOx or VOCs located at facilities described in § 212-3.1(a) must have submitted a compliance plan to NYSDEC by October 20, 1994. The compliance plan must either have included the RACT analysis required by 6 N.Y.C.R.R. § 212-3.1(c) or a plan to limit the annual potential to emit VOC below the applicability levels pursuant to 6 N.Y.C.R.R. § 212-3.1(d).

24. Pursuant to 6 N.Y.C.R.R. § 212-3.1(c), facilities subject to § 212-3.1(a) must identify RACT for each emission point that emits VOC for major VOC facilities. The compliance plan must identify the emission points that do not employ RACT, and a schedule for implementation of RACT must be included in the plan. A RACT analysis is not required for emission points with NO_x and VOC emission rate potentials less than 3 pounds per hour and actual emissions in the absence of control equipment less than fifteen (15) pounds per day at facilities located outside of the Lower Orange County towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick, and Woodbury and the New York City metropolitan area. RACT as approved by the department must be implemented on each emission point subject to this section by May 31, 1995.

25. At all times relevant to this Agreement, the federally approved SIP for the State of New York has included portions of 6 N.Y.C.R.R. Part 201 ("Permits and Certificates"), including but not limited to § 201-7.1.

26. Except as specifically described in 6 N.Y.C.R.R. § 201-3, owners and operators of air contamination sources must comply with 6 N.Y.C.R.R. Part 201. *See* 6 N.Y.C.R.R. § 201-1.1(b).

27. Pursuant to 6 N.Y.C.R.R. § 201-7.1 ("Federally Enforceable Emissions Cap"), the owner or operator of a facility subject to 6 N.Y.C.R.R. Part 201 may elect to accept federally enforceable permit conditions which restrict or cap emissions from the facility or an emission source in order to avoid being subject to one or more applicable requirements.

28. Pursuant to 6 N.Y.C.R.R. § 212-3.1(e), any facility that is subject to the RACT requirements after May 31, 1995, remains subject to them, even if its annual potential to emit VOCs later falls below the applicability threshold.

29. Pursuant to 6 N.Y.C.R.R. § 212-3.1(f), facilities subject to § 212-3.1(a) that commence construction after August 15, 1994 of an emission point with an emission rate potential of at least 3 pounds of VOC per hour and actual emissions in the absence of control equipment of at least fifteen (15) pounds of VOC per day must submit a RACT demonstration for VOC emissions with each application for a permit to operate, and must implement RACT on any such emission points when operation commences.

30. Pursuant to 6 N.Y.C.R.R. § 212-3.1(c)(4)(i), "VOC emission points that are equipped with a capture system and a control device with an overall removal efficiency of at least eighty-one (81%) percent are equipped with reasonably available control technology."

31. Pursuant to 6 N.Y.C.R.R. § 212-3.1(c)(4)(iii), "Where the facility owner or operator can show to the satisfaction of the department that an emission point cannot achieve an overall removal efficiency of eighty-one (81%) percent . . . for reasons of technological or economic feasibility, the department may accept a lesser degree of control upon submission of satisfactory evidence that the facility owner or operator will apply reasonably available control technology. These process specific RACT demonstrations that are acceptable to the department

will be submitted to the EPA for approval as a revision to the State Implementation Plan by the department."

32. At all times relevant to this Agreement, the federally approved SIP for the State of New York has included 6 N.Y.C.R.R. Part 202 ("Emission Statements").

33. Pursuant to 6 N.Y.C.R.R. § 202-2.1(a)(1), the requirements of 6 N.Y.C.R.R. Subpart 202-2 apply to ". . . any owner or operator of a facility located in New York State which is determined to be a major source as defined in [6 N.Y.C.R.R. Part 201, Subpart 201-2] for all or any part of such calendar year."

34. Pursuant to 6 N.Y.C.R.R. §§ 202-2.3(a)(3)(xii) and (xiii), (c)(2), 202-2.4(a), and 202-2.5(a), major sources must annually report process and fugitive emissions of all regulated air contaminants and maintain those reports for five years.

Clean Air Act Title V Operating Permit

35. Title V of the Act ("Title V") consists of CAA Sections 501 to 507, 42 U.S.C. §§ 7661-7661f.

36. In general, Title V requires each "major source" to obtain an operating permit setting forth all the air pollution requirements that apply to that source; Title V also provides for the creation of state and federal programs to issue such permits.

37. Section 501 of the CAA, 42 U.S.C. § 7661(2), defines a "major source," as used in Title V, as any stationary source or group of stationary sources located within a contiguous area and under common control that is a major source as defined in either Section 112 of the Act, Section 302 of the Act, or Part D of Subchapter I of the Act.

38. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), makes unlawful the operation of any source subject to Title V, except operation in compliance with a permit issued by a permitting authority pursuant to Title V.

39. Section 502(b) of the CAA, 42 U.S.C. § 7661a(b), requires EPA to promulgate regulations establishing the minimum elements of a Title V operating permit program; it also sets forth the procedures by which EPA would approve, oversee, and withdraw approval of state operating permit programs.

40. Section 502(d) of the CAA, 42 U.S.C. § 7661a(d), requires each state to develop and submit to EPA a permit program meeting the requirements of Title V.

41. Section 502(e) of the CAA, 42 U.S.C. § 7661a(e), authorizes EPA to retain the authority to enforce Title V operating permits issued by a state.

42. On July 21, 1992, pursuant to CAA Section 502(b), EPA promulgated 40 C.F.R. Part 70 ("Part 70"), which governs state operating permit programs. *See* 57 Fed. Reg. 32295 (July 21, 1992).

43. 40 C.F.R. § 70.4 requires each state to submit a permitting program, developed in accordance with Part 70, to EPA for approval. States are authorized to administer their own EPA-approved Title V operating permit programs.

44. Effective December 9, 1996, EPA granted interim approval (61 Fed. Reg. 57589, Nov. 7, 1996), and on January 31, 2002, EPA granted full approval of the New York State Title V Operating Permit Program (67 Fed. Reg. 5216, Feb. 5, 2002).

45. The New York State Title V Facility Permit Regulations ("Title V Regulations"), located at 6 N.Y.C.R.R. Part 201, Subpart 201-6, implement numerous requirements of the CAA, and apply to, among other things, any "major facility." 6 N.Y.C.R.R. § 201-6.1(a)(1).

46. New York's Title V Regulations apply to any "major facility" as defined in 6 N.Y.C.R.R. Part 201, Subpart 201-2, which in turn defines a "major stationary source or major source or major facility" as, *among other things, any* source that is located in an attainment area of the State within the ozone transport region and is a stationary source, source, or facility with the potential to emit fifty (50) tons per year or more of VOC. 6 N.Y.C.R.R. § 201-2.1(b)(21)(iv)(c).

47. 6 N.Y.C.R.R. § 201-6.1(a) requires an owner or operator of a major facility to obtain an operating permit ("Title V Permit") before operating the source.

C. Findings of Fact

48. The following findings of fact are based in part on an investigation conducted by EPA, Region 2 pursuant to Section 114 of the Act, 42 U.S.C. § 7414 ("EPA Investigation"). The EPA Investigation included, among other actions: (a) an onsite inspection of the Facility; (b) an information request made to Buffalo Shredding about the Facility and its operations; (c) a review of Respondent's records as provided to EPA subsequent to the information request; (d) a review of emission data and emission test results of metal shredders comparable to the metal shredder in operation at the Facility; (e) discussions with NYSDEC regarding these types of facilities; and (f) conversations, emails and other correspondence with Buffalo Shredding, and materials it provided.

49. Buffalo Shredding, a wholly owned subsidiary of Metalico, Inc., owns and operates the scrap metal processing facility located at 3175 Lake Shore Road in Blasdell, New York. The

Facility operates a metal shredder to process scrap automobiles and other scrap metal materials. The Facility is not located in the Lower Orange County towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick, or Woodbury or the New York City metropolitan area.

50. The Facility was issued an Air Facility Registration Certificate ("Certificate") (Registration ID: 9-1448-00419/00001) by the NYSDEC pursuant to 6 N.Y.C.R.R. § 201-4. The Certificate lists a "Registration Effective Date" of November 20, 2017, and a "Registration Expiration Date" of November 19, 2027.

51. EPA sent an information request letter dated December 23, 2021 ("IRL") to Buffalo Shredding pursuant to Section 114 of the Act. The IRL included, among other items, a request for information from Buffalo Shredding regarding: (1) the installation date, startup date, and manufacturer's rated capacity of the metal shredder; and (2) the total monthly quantity of scrap metal processed by the metal shredder and all available emission calculations (for VOC and other pollutants) for the metal shredder for calendar years 2019 and 2020.

52. On February 23, 2022, Buffalo Shredding provided responses to the IRL ("Buffalo Shredding Response").

53. The Buffalo Shredding Response states that the Facility's shredder installation started on August 23, 2011, and the shredder became operational on February 14, 2012. The shredder was manufactured by Hammer Mill International with a box size that is ninety-six (96) inches by one hundred and four (104) inches, ten (10) hammers, and the capacity to process up to one hundred and twenty (120) gross tons of scrap per hour.

54. The Buffalo Shredding Response states that the Facility's shredder "operates under an input limit of three hundred and twelve thousand (312,000) tons per year per the NYSDEC Air Facility Registration application documents."

55. The Buffalo Shredding Response states that the Facility has the potential to emit fifty-seven.seventy-two (57.72) tons of VOC per calendar year based on the Facility maximum potential scrap metal throughput limit of three hundred and twelve thousand (312,000) tons per year specified in the Buffalo Shredding Response and a total VOC emission factor of 0.37 pounds per ton of scrap metal processed.

56. Buffalo Shredding does not employ a regenerative thermal oxidizer ("RTO") or other control device that meets minimum RACT requirements to limit its VOC emissions.

57. Specifically, Buffalo Shredding does not have a control device with an overall removal efficiency of at least 81 percent, and it does not have a proposed alternative RACT that has been approved into the SIP (or even submitted for SIP approval).

58. Based on information contained in the Buffalo Shredding Response, EPA performed VOC emissions calculations and determined that the Facility's metal shredder's VOC emissions rate exceeds 3.0 pounds of VOC per hour, and its actual emissions in the absence of control equipment exceeds fifteen (15) pounds of VOCs per day.

59. The EPA Investigation reveals that Respondent has not submitted to New York a compliance plan of the type required by 6 N.Y.C.R.R. § 212-3.1(b).

60. The EPA investigation reveals that the Respondent has not sought and has no permit that contains any federally-enforceable permit conditions which restrict or cap VOC emissions to below fifty (50) tons per year.

61. The EPA Investigation also reveals that Respondent does not hold, nor has it applied for, a Title V operating permit for the Facility pursuant to 6 N.Y.C.R.R. § 201-6.

62. On June 8, 2023, EPA issued a Notice of Violation (NOV) to the Respondent, and sent a copy to NYSDEC, for, among other things, violations of the New York SIP.

D. Alleged Violations of Law

Based on the Findings of Fact as set forth above, EPA alleges as follows:

63. Respondent is a "person" within the meaning of Section 302(e) of the Act and 6 N.Y.C.R.R. § 200.1(bi).

64. Respondent is the owner and operator of the Facility.

65. Respondent has operated and continues to operate the Facility with a potential to emit in excess of fifty (50) tons per year of VOC without obtaining and maintaining the required permits or federally enforceable permit conditions limiting emissions of VOCs in violation of 6 N.Y.C.R.R. Part 201, Subparts 201-6, and Section 502 of the Act. *See e.g.,* 6 N.Y.C.R.R. § 201-6.1(a).

66. Respondent's failure to operate the Facility's metal shredder with VOC controls that meet the requirements of RACT is a violation of 6 N.Y.C.R.R. § 212-3.1.

E. Order on Consent

67. Respondents shall conduct the compliance program described in this section of this Order.

68. Consistent with the Findings of Fact and Alleged Violations of Law above, pursuant to Sections 113(a) of the Act, IT IS DETERMINED AND ORDERED that:

a. Within sixty (60) days of the Effective Date of this Order, Respondent shall submit to the NYSDEC and to EPA (for EPA's information) a complete Permit Application for the Facility which requests NYSDEC's issuance of a CAA Synthetic Minor Permit ("Synthetic Minor Permit Application") containing the following limitations and conditions:

   i. Shredder Operational Limitations

      1. Compliance with a maximum twelve (12)month throughput rate of two hundred and forty-seven thousand, five hundred (247,500) gross tons per year of shredder feed, calculated on a twelve (12)-month rolling average basis, such that the Facility's potential to emit remains below fifty (50) tons per year of VOCs when including the shredder and all other VOC emitting sources located at the Facility; and

      2. An emission factor of 0.39 pounds of VOC per gross ton of shredder feed (lbs VOC/gross ton) shall be used for all VOC emissions calculations related to VOC emissions generated by the Facility shredder.

   ii. Requirement to Document and Record Shredder Feed Throughput: Respondent shall maintain a daily written record of the Facility's shredder feed throughput and hours of operation, as recorded by the ERP system upon receipt.

iii. Requirement for Best Management Practices Plan: As part of the permit application in Paragraph 68(a) above, Respondent shall submit a new or updated Best Management Practices Plan ("BMP Plan"). The BMP Plan shall include, at a minimum, the following elements, and shall describe how they will be implemented at the Facility:

1. Fire Prevention, including, but not limited to, use of an infrared ("IT") camera (or other temperature gauging equipment) to scan the Facility and scrap piles as a means of reducing the potential for fires; on site trainings on the use of equipment and fire responses; fire hydrant map; and maintenance activities;
2. Visible Emissions Reduction, including, but not limited to, water suppression and other means to prevent dust and other visible emissions from leaving the Facility boundary; and
3. Hazard Reduction, including, but not limited to, sorting and removal of pressurized tanks, handling of fuel-containing materials to minimize explosions in the shredder, and removal of lithium and other batteries.

F. Other Terms and Conditions

69. Respondent admits the jurisdictional allegations contained in this Order.

70. Respondent neither admits nor denies the findings in Section C (Findings of Fact) or the alleged violations in Section D (Alleged Violations of Law) of this Order.

G. General Provisions

71. Any failure to comply with the requirements of this Order shall constitute a violation of this Order and may result in a civil administrative or judicial action for an injunction or civil penalties of up to $121,275[1] per day per violation, or both, as provided in Sections 113(b)(2) and 113(d)(1) of the Act, 42 U.S.C. §§ 7413(b)(2) and 7413(d)(1). Additionally, any violations of the Order may result in criminal sanctions as provided in Section 113(c) of the Act, 42 U.S.C. § 7413(c). The EPA may use any information submitted under this Order in an administrative, civil judicial, or criminal action.

72. Nothing in this Order shall relieve Respondents of the duty to comply with all applicable provisions of the Act or other federal, state or local laws or statutes, nor shall it restrict the EPA's authority to seek compliance with any applicable laws or regulations, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state, or local permit.

73. For purposes of the identification requirement of Section 162(f)(2)(A)(ii) of the Internal Revenue Code, and 26 C.F.R. § 1.162-21(b)(2), performance of the requirements of Paragraphs 70-71 of this Order is restitution, remediation, or required to come into compliance with the law.

[1] This amount reflects the appropriate adjustments over time as required by the Federal Civil Penalties Inflation Adjustment Act of 1990 (28 U.S.C. § 2461 note; Pub. L. 101-410), as amended by the Debt Collection Improvement Act of 1996, by the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015 (28 U.S.C. § 2461 note; Pub. L. 114-74, Section 701), and most recently by the 2024 Civil Monetary Penalty Inflation Adjustment final rule (88 Fed. Reg. 247, December 27, 2023) (effective January 15, 2024).

74. Nothing in this Order shall be construed to limit the power of the EPA to undertake any action against Respondent or any person in response to conditions that may present an imminent and substantial endangerment to the public health or welfare, or the environment.

75. The provisions of this Order shall apply to and be binding upon Respondents and its Officers, directors, employees, agents, trustees, servants, authorized representatives, successors, and assigns. From the Effective Date of this Order (Paragraph 81) until the Termination Date of this Order (Paragraph 83) as set out below, Respondent must give written notice and a copy of this Order to any successors in interest prior to any transfer of ownership or control of any portion of or interest in the Facility. Simultaneously with such notice, Respondents shall provide written notice of such transfer, assignment, or delegation to the EPA. In the event of any such transfer, assignment, or delegation, Respondents shall not be released from the obligations or liabilities of this Order unless the EPA has provided written approval of the release of said obligations or liabilities. Respondents shall condition such transfer, assignment, or delegation upon agreement by transferee, assignee, or delegate to be subject to the obligations under this Order.

76. Unless this Order states otherwise, whenever, under the terms of this Order, written notice or other document is required to be given, it shall be directed to the individuals specified at the addresses below unless those individuals or their successors give notice of a change of address to the other party in writing:

Robert Buettner, Chief
Air Compliance Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency - Region 2
290 Broadway, 21st Floor
New York, NY 10007

Buettner.Robert@epa.gov

All notices and submissions shall be considered effective upon receipt. Notices, documents, or submissions due to the EPA shall be sent via email to Buettner.Robert@epa.gov unless arrangements are otherwise made by contacting Mr. Buettner via email.

77. By signing this Order, Respondent acknowledges that Order will be available to the public and agrees that this Order does not contain any confidential business information ("CBI") or personally identifiable information.

78. To the extent this Order requires Respondents to submit any information to the EPA, Respondents may assert a claim of CBI covering part or all of that information, but only to the extent and only in the manner described in 40 C.F.R. Part 2, Subpart B. The EPA will disclose information submitted under CBI claim only as provided in 40 C.F.R. Part 2, Subpart B. If Respondents do not assert a CBI claim, the EPA may make the submitted information available to the public without further notice to Respondent.

79. By signing this Order, Complainant and Respondent each give their respective consent to accept digital signatures hereupon. Respondent further consents to accept electronic service of the fully executed Order, by electronic mail, to the following address for Respondent's counsel: cgrieco@bsk.com. Respondent understands that this e-mail address may be made public when the Order and Certificate of Service are filed and uploaded to a searchable database.

80. Each undersigned representative of Complainant and Respondent certifies that he or she is authorized to enter into the terms and conditions of this Order to execute and bind legally the Parties to this document.

H. Effective Date and Opportunity for a Conference

81. Pursuant to Section 113(a)(4) of the Act, an Order does not take effect until the person to whom it has been issued has had an opportunity to confer with the EPA concerning the alleged violations. By signing this Order, Respondent acknowledges and agrees that they have been provided an opportunity to confer with the EPA prior to issuance of this Order. Accordingly, this Order will take effect immediately upon signature by the latter of Respondents or the EPA (the "Effective Date").

I. Judicial Review

82. Respondent waives any and all remedies, claims for relief, and otherwise available rights to judicial or administrative review that Respondents may have with respect to any issue of fact or law set forth in this Order, including any right of judicial review under Section 307(b)(l) of the Clean Air Act, 42 U.S.C. § 7607(b)(l).

J. Termination

83. This Order shall terminate on the earlier of the following (the "Termination Date") at which point Respondents shall operate in compliance with the Act:

a. One (1) year after the Effective Date of this Order; or

b. The effective date of any determination by the EPA that Respondents have achieved compliance with all terms of this Order; or

c. Immediately upon receipt by Respondents of notice from the EPA finding that an imminent and substantial endangerment to public health or welfare, or the environment has occurred.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

In the Matter of: Buffalo Shredding and Recovery, LLC Blasdell, New York Respondent, In a proceeding under Section 113(a) of the Clean Air Act, 42 U.S.C. § 7413(a)	**ADMINISTRATIVE COMPLIANCE ORDER ON CONSENT** CAA-02-2024-1211

For the United States Environmental Protection Agency, Region 2:

1-22-2025

Kathleen Anderson, Director
Enforcement and Compliance Assurance Division

Date

For Buffalo Shredding and Recovery, LLC:

Signature

1-20-25
Date

Printed Name: KEVIN WHALEN

Title: AUTHORIZED REPRESENTATIVE

Address: C/O METALICO, INC. 135 DERMODY ST., CRANFORD, NJ 07016

Attachment K

Best Management Practices (BMP) Plan

Air Permit

Best Management Practices (BMP) Plan

Metalico Buffalo Shredding & Recovery

Metalico Buffalo Shredding & Recovery
3172 Lakeshore Road
Blasdell, NY 14219

March 2025

Metalico Buffalo Shredding & Recovery
3172 Lakeshore Road
Blasdell, NY 14219

Best Management Practices (BMP) Plan

March 2025

Table of Contents

1.0 FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Name and Location

The Metalico Buffalo Shredding & Recovery is a scrap recycling facility (herein referred to as the "site" or "facility") is located in the City of Blasdell in Erie County, New York.

Facility Address and Telephone:

Metalico Buffalo Shredding & Recovery
3172 Lakeshore Road
Blasdell, NY 14219
(412) 538-0183
Contact: Glenda Wehrli, Director of Environmental Compliance and Employee Safety

1.2 Facility Owner/Operator

The facility is owned and operated by Metalico Buffalo Shredding & Recovery. The main offices are located at the following address:

Owner/Operator Address:

Metalico Buffalo Shredding & Recovery
3172 Lakeshore Road
Blasdell, NY 14219
(412) 538-0183

1.3 Facility Contacts

The facility personnel responsible for overseeing the implementation of this BMP Plan are as follows:

Title	Name
General Manager	Rick Rothfuss
Director of Environmental Compliance & Employee Safety	Glenda Wehrli
Environmental Compliance & Employee Safety	Jim Bucki
Shredder Operations Manager	James Pagano
Non-Ferrous Downstream Operations Manager	Eric Bucki

1.4 Facility Description

1.4.1 Facility Operations

In general, operations at the facility are typical of a scrap metal processing and recycling facility. The facility specializes in the recycling of ferrous and non-ferrous metals. The facility receives, sorts, stores, and processes scrap metals. The scrap processing portion of the facility is normally staffed during the hours of 5:00 a.m. to 3:00 p.m. Monday through Friday.

1.4.2 Site Description

The facility is situated in a commercial/industrial area of the City of Blasdell in Erie County, New York. The facility is accessible from Lakeshore Road.

The site also includes developed areas for site and facility access, vehicle parking, equipment fueling and storage/processing of scrap metal. A limited amount of undeveloped scrub vegetation covered area is located at the northwest end and south side of the site. The main building houses an office area, maintenance area, and scrap processing area.

2.0 BEST MANAGEMENT PRACTICES (BMPS)

The following techniques are considered best management practices (BMPs) to prevent or mitigate potential airborne contaminants from the facility operations and are to be followed as part of normal procedures.

The BMP Plan will be modified whenever there is a change at the facility and/or when there are any deviations that occur repeatedly.

2.1 Particulate Matter Control

Particulate matter is the simplest of potential airborne contaminants and is often related to fugitive dust in the air. To properly eliminate and control particulate emissions throughout the facility, sweeping and watering of the roadways and driveways is conducted at the facility. These procedures are conducted regularly, except for on days in which enough snow, ice, or precipitation has occurred that is sufficient for that day to ensure compliance. The following operations/procedures are in place:

- Sweeper:
    - The sweeper must be operated according to the manufacturers' recommended procedures.
    - Prior to sweeping, brushes will be inspected to ensure they are functional (Note: Brushes will be replaced when the bristle length is less than 3 inches).
    - While sweeping, the operator will drive 5 mph.
    - Any hotspot areas will be noted for extra sweeping.
- Watering Truck:
    - The water truck must be operated according to the manufacturers' recommended procedures.
    - Prior to watering, hoses will be inspected to ensure they are functional.
    - While operating the water trucks, the operator will drive 5 mph.
    - Any hotspot areas will be noted for extra watering.

Operation Managers at the facility are responsible for environmental compliance, and the Maintenance Manager oversees the maintenance of the sweeper and watering equipment/vehicles.

2.2 Inbound Material Inspection

Non-conforming materials, hazardous or dangerous materials, and unwanted materials, are all potentials for unwanted reactions with incompatible materials, or fires. Metalico follows strict guidelines for what materials are to be accepted at any site, and these guidelines are issued to clients prior to materials being shipped to the facility.

Incoming loads are inspected and screened for non-conforming, hazardous, dangerous, or unwanted materials. The following table includes incoming material that is unacceptable at the facility.

Unacceptable Incoming Materials	
Fuel tanks containing liquid and/or vapor	Acetylene, oxygen, propane cylinders, closed containers, or sealed units of any kind
Batteries or battery pieces	Garbage, rags, paper, debris, wood, concrete, or insulation
Lead cable ends	Heavy steel solids thicker than ½"
Tires	Cable and wire of any kind, including fencing
Liquids or sludge of any kind	Steel or cast-iron boring or turnings
Air bag canisters	Capacitors
Sealed drums, barrels, pails, or buckets	Transformers
Microwave ovens/microwaves	Fluorescent light ballasts containing PCBs
Oil filters	Radioactive material
Copper laminated steel	Mercury switches
White goods, air conditioners, or refrigeration equipment with freon (CFCs and HCFCs)	Computers with circuit boards
Tin cans	

2.3 Shredder Operational Limitations

The Facility imposes the following operational limitations on the shredder:

- A maximum throughput rate of 247,500 gross tons per year of shred feed, calculated on a twelve (12)- month rolling average basis.
- The Facility will not exceed a PTE of 50 tons per year of VOCs, including all other VOC emitting sources located at the Facility.
- An emission factor of 0.39 pounds of VOCs per gross ton of shredder feed (lbs VOC/gross ton) shall be used for all VOC emissions calculations related to VOC emissions generated by the Facility shredder.

2.4 Fire Prevention

The facility has a Fire Prevention Plan (FPP) in place to control and reduce the possibility of fire and to specify the type of equipment to use in case of fire. All employees at the facility receive annual fire training. Further:

- Equipment and vehicles are parked a safe distance away from stored scrap material.
- Fire suppression equipment, including fire extinguishers, battery suppressant powder/granulates, and water bombs, is staged throughout the facility.