Message

From: Burke, Shaun [Burke.Shaun@epa.gov]
Sent: 6/17/2021 2:41:09 PM
To: Cardile, Joseph [Cardile.Joseph@epa.gov]; LaVigna, Gaetano [LaVigna.Gaetano@epa.gov]; Prentice, Amanda [Prentice.Amanda@epa.gov]
CC: Buettner, Robert [Buettner.Robert@epa.gov]
Subject: RE: Parkway Iron and Metal, Reference Number: CAA-02-2020-1461

Ex. 5 AC / Ex. 7(A)

From: Cardile, Joseph <Cardile.Joseph@epa.gov>
Sent: Thursday, June 17, 2021 10:05 AM
To: LaVigna, Gaetano <LaVigna.Gaetano@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>; Prentice, Amanda <Prentice.Amanda@epa.gov>
Cc: Buettner, Robert <Buettner.Robert@epa.gov>
Subject: RE: Parkway Iron and Metal, Reference Number: CAA-02-2020-1461

Ex. 5 AC / Ex. 7(A)

Joe

From: LaVigna, Gaetano <LaVigna.Gaetano@epa.gov>
Sent: Thursday, June 17, 2021 9:35 AM
To: Cardile, Joseph <Cardile.Joseph@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>; Prentice, Amanda <Prentice.Amanda@epa.gov>
Cc: Buettner, Robert <Buettner.Robert@epa.gov>
Subject: RE: Parkway Iron and Metal, Reference Number: CAA-02-2020-1461

Ex. 5 AC / Ex. 7(A)

Gaetano La Vigna, Chief
Stationary Source Compliance Section
Air Compliance Branch
U.S. EPA Region 2
290 Broadway, 21st Floor
New York, New York 10007-1866
Phone (212) 637-4069
Email LaVigna.Gaetano@epa.gov

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From: Cardile, Joseph <Cardile.Joseph@epa.gov>
Sent: Thursday, June 17, 2021 9:25 AM
To: Burke, Shaun <Burke.Shaun@epa.gov>; Prentice, Amanda <Prentice.Amanda@epa.gov>
Cc: LaVigna, Gaetano <LaVigna.Gaetano@epa.gov>; Buettner, Robert <Buettner.Robert@epa.gov>
Subject: RE: Parkway Iron and Metal, Reference Number: CAA-02-2020-1461

Ex. 5 AC / Ex. 7(A)

Thx
Joe

From: Burke, Shaun <Burke.Shaun@epa.gov>
Sent: Thursday, June 17, 2021 9:04 AM
To: Prentice, Amanda <Prentice.Amanda@epa.gov>; Cardile, Joseph <Cardile.Joseph@epa.gov>
Cc: LaVigna, Gaetano <LaVigna.Gaetano@epa.gov>
Subject: RE: Parkway Iron and Metal, Reference Number: CAA-02-2020-1461

Ex. 5 AC / Ex. 7(A)

Thanks

From: Prentice, Amanda <Prentice.Amanda@epa.gov>
Sent: Thursday, June 17, 2021 8:52 AM
To: Cardile, Joseph <Cardile.Joseph@epa.gov>; Burke, Shaun <Burke.Shaun@epa.gov>
Cc: LaVigna, Gaetano <LaVigna.Gaetano@epa.gov>
Subject: RE: Parkway Iron and Metal, Reference Number: CAA-02-2020-1461

Ex. 5 AC / Ex. 7(A)

From: Cardile, Joseph <Cardile.Joseph@epa.gov>
Sent: Wednesday, June 16, 2021 6:48 PM
To: Burke, Shaun <Burke.Shaun@epa.gov>
Cc: Prentice, Amanda <Prentice.Amanda@epa.gov>; LaVigna, Gaetano <LaVigna.Gaetano@epa.gov>
Subject: FW: Parkway Iron and Metal, Reference Number: CAA-02-2020-1461

Hi Shaun,

Ex. 5 AC / Ex. 7(A)

Thx
Joe

From: Bob Peshak <bpeshak@envirosure.com>
Sent: Wednesday, May 19, 2021 4:03 PM
To: Prentice, Amanda <Prentice.Amanda@epa.gov>; Alex Benisatto <ABenisatto@shapiro-croland.com>
Cc: Cardile, Joseph <Cardile.Joseph@epa.gov>; Andrew Maybaum <andy@parkwayiron.com>
Subject: Parkway Iron and Metal, Reference Number: CAA-02-2020-1461

Good afternoon,

On behalf of Parkway Iron and Metal (Parkway), I respectfully submit this reply to your letter dated March 22, 2021. Parkway is a small metal recycling and shred plant located in Clifton, New Jersey. In the last 12 months (May 2020 through April 2021) they have passed approximately Ex. 4 CBI of metal through the hammermill. Due to equipment failure, the hammermill was down for approximately 6 months during this period. Parkway estimates that during a normal year, approximately Ex. 4 CBI would be processed through the hammermill. This includes approximately Ex. 4 CBI Ex. 4 CBI We have prepared emissions estimates the last 12 months and for an average year Ex. 4 CBI for Volatile Organic Compounds and particulate matter using emission factors from the following sources: 1) the February 2005 Capital City stack test for PM; 2) April 2010 Source Test Report from OmniSource for VOCs; and 3) the ISRI Title V Applicability Workbook for metal HAPs. These are widely accepted throughout the industry and the regulating communities across the country. Based on these estimates, the emissions at Parkway are very low especially when compared to other shred plants that may process in excess of 200,000 tons per year.

The hammermill at Parkway does not have a stack, there is no point source to collect a representative sample. The EPA is requesting a performance test, this is not possible without a stack.

Lastly, I would like to add that Parkway has a history of complying with the US EPA. The facility has complied with the EPA's previous requests for data, emissions control technology, CFC recovery plans and we continue to abide by our plans and permits. We would like to discuss these issues with you and with representative(s) from Parkway, and see what we can do to satisfy your request for data. Please let me know when we can schedule that call. We look forward to working with you on this important matter.

Bob Peshak
General Manager
Envirosure, LLC

From: Prentice, Amanda [mailto:Prentice.Amanda@epa.gov]
Sent: Monday, May 3, 2021 6:50 AM
To: Bob Peshak; Alex Benisatto
Cc: Cardile, Joseph
Subject: RE: Parkway Iron and Metal, Reference Number: CAA-02-2020-1461

Hi Alex and Bob,

Thanks for reaching out. I was out of the office on Friday, but I am copying Joe Cardile, to whom you should refer technical questions. If you speak on the phone, it is EPA's policy to have a representative from the company also on the call, along with the environmental consultant.

Thanks,
Amanda

From: Bob Peshak <bpeshak@envirosure.com>
Sent: Thursday, April 29, 2021 6:30 PM
To: Alex Benisatto <ABenisatto@shapiro-croland.com>; Prentice, Amanda <Prentice.Amanda@epa.gov>
Subject: RE: Parkway Iron and Metal, Reference Number: CAA-02-2020-1461

Thank you for the introduction Alex, and nice meeting you Amanda. I am looking forward to working with you on this project. I'll try to reach out to you tomorrow, I had some preliminary questions of the Request for Information letter dated March 22, 2021.

Hope you both have a great evening.

Bob Peshak
General Manager
Envirosure, LLC

From: Alex Benisatto [mailto:ABenisatto@shapiro-croland.com]
Sent: Thursday, April 29, 2021 3:09 PM
To: Prentice, Amanda
Cc: Bob Peshak
Subject: RE: Parkway Iron and Metal, Reference Number: CAA-02-2020-1461

Good evening Amanda:

Hope all is well. As you know, we represent Parkway Iron and Metal.
I wanted to reach out to you and introduce you to Bob Peshak of Envirosure, LLC, Parkway's consultant, which will be assisting with regard to your office's most recent request.
Bob and Envirosure are authorized to communicate directly with you and/or your office on this matter.

Please call with any questions.

Alex

ShapiroCroland
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From: Prentice, Amanda <Prentice.Amanda@epa.gov>
Sent: Thursday, March 11, 2021 12:03 PM
To: Alex Benisatto <ABenisatto@shapiro-croland.com>
Cc: Stuart Reiser <SReiser@shapiro-croland.com>
Subject: RE: Parkway Iron and Metal, Reference Number: CAA-02-2020-1461

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Hi Alex and Stuart,

I hope all is well. I wanted to make sure you still represent Parkway Iron and Metal? We have a follow-up CAA Section 114 request we are sending to the company, and I will send you a copy as well if that is the case. We also wanted to confirm that Andrew Maybaum, Vice President and Chief Operating Officer, is the correct addressee at the company for the request? Would you mind sharing Andrew's work email address (or the company's email address, if there is a general inbox)?

Thanks,
Amanda

Amanda M. Prentice
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor
New York, NY 10007
Phone: 212-637-3209

Email: Prentice.Amanda@epa.gov
Pronouns: she/her

From: Alex Benisatto <ABenisatto@shapiro-croland.com>
Sent: Thursday, December 3, 2020 10:34 AM
To: Prentice, Amanda <Prentice.Amanda@epa.gov>
Cc: Stuart Reiser <SReiser@shapiro-croland.com>
Subject: RE: Parkway Iron and Metal, Reference Number: CAA-02-2020-1461

Good morning Amanda:

Last night's email contained everything on the referenced CD (including digital copies of the 2 referenced oversized maps).
The only thing you did not receive were the hard copies of the 2 oversized maps. The digital copies of those were provided in last night's email. They are the last 2 pages of Attachment 1.

Alex

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From: Prentice, Amanda <Prentice.Amanda@epa.gov>
Sent: Thursday, December 3, 2020 10:24 AM
To: Alex Benisatto <ABenisatto@shapiro-croland.com>
Cc: Stuart Reiser <SReiser@shapiro-croland.com>
Subject: RE: Parkway Iron and Metal, Reference Number: CAA-02-2020-1461

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Dear Alex,

Thanks very much. The cover letter mentions a CD of materials and hard copies of two oversized maps. Does the attachment with the certified responses contain all of the materials that were contained on the CD and the maps?

Thanks,

Amanda

Amanda M. Prentice
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor
New York, NY 10007
Phone: 212-637-3209
Email: Prentice.Amanda@epa.gov
Pronouns: she/her

From: Alex Benisatto <ABenisatto@shapiro-croland.com>
Sent: Wednesday, December 2, 2020 3:54 PM
To: Prentice, Amanda <Prentice.Amanda@epa.gov>
Cc: Stuart Reiser <SReiser@shapiro-croland.com>
Subject: Parkway Iron and Metal, Reference Number: CAA-02-2020-1461

Dear Mr. Prentice:

We represent Parkway Iron & Metal, Inc. ("Parkway"). Per your discussion with Stuart Reiser, Esq. earlier today, I am attaching Parkway's Certified Responses to Request for Information in the above matter, together with a copy of our August 28, 2020 transmittal letter (addressed to the Region 2 Office at 290 Broadway, Attn.: Robert Buettner) and a copy of the Federal Express confirmation indicating the same was delivered on August 31, 2020.

If you have any questions, please feel free to contact us.

Alex

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