ShapiroCroland
Shapiro, Croland, Reiser, Apfel & Di Iorio, LLP

Stuart Reiser
Partner
sreiser@shapiro-croland.com
Member NJ and NY Bar
Certified Civil Trial Attorney

July 14, 2017

Via E-Mail
James L. Simpson, Assistant Regional Counsel
U.S. Environmental Protection Agency
290 Broadway – 16th Floor
New York, New York 10007-1866

Re: Parkway Iron & Metal Co. adv. U.S.
Civil Action No.: 2:16-cv-02515

Dear Mr. Simpson:

Enclosed please find for filing a copy of the SEP Completion Report in accordance with the terms of the Consent Decree entered in the above-referenced action.

If you have any questions, please contact me.

Very truly yours,

Stuart Reiser

SR:dmm
Encl.
Cc: Rachel King, Esq. (via e-mail)
Parkway Iron & Metal
Attn: Andy Maybaum, COO (via e-mail)

SHAPIRO, CROLAND, REISER,
APFEL & DI IORIO, LLP
Stuart Reiser, Esq. Attorney No. 1505-1980
411 Hackensack Avenue
Hackensack, NJ 07601
Tel: (201) 488-3900
Fax: (201) 488-9481
Attorneys for Defendant,
Parkway Iron & Metal Co., Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA, Plaintiff, v. PARKWAY IRON AND METAL CO., INC., Defendants.	Civil Action No.: 2:16-cv-02515

SUPPLEMENTAL ENVIRONMENTAL PROJECT COMPLETION REPORT
ARTICLE VI, PARAGRAPH 23(b) OF THE CONSENT DECREE FILED MAY 4, 2016

Andy Maybaum, of full age, does hereby certify as follows:

1. I am the Chief Operating Officer of Defendant, Parkway Iron & Metal Co., Inc. In that regard, this Certification and Supplemental Environmental Project (the "SEP") Completion Report is made on personal knowledge and it is submitted in accordance with Article VI, Paragraph 23(b) of the Consent Decree filed May 4, 2016 in the above-matter.

2. By email dated June 14, 2017 from Parkway's counsel to James Simpson, Esq., Assistant General Counsel of the Environmental Protection Agency (the "EPA"), Parkway gave notice to the EPA that the SEP, more particularly described in the Consent Decree at Appendix B, had been installed and was fully operational. A short video that depicted the SEP in operation at the Parkway Facility was attached to the June 14th email.

3. As per Article VI, Paragraph 22(b) of the Consent Decree, Parkway was obligated to spend $261,000 to purchase and install the SEP. Annexed hereto as Exhibit A is a spreadsheet and back up documentation which demonstrates that Parkway expended $369,935.55 to purchase and install the SEP -- $108,935.55 more than the estimate received from the equipment manufacturer. The excess costs incurred were due to unexpected complications that were encountered during the installation of the SEP, including extra welding, rigging and electrical costs, etc.

4. The first full day that SEP was operational at Parkway was June 17, 2017. From June 17, 2017 through July 6, 2017 the shredder and attached SEP were operational for 8 full days (approximately 56 hours of operation). During that period of time, Parkway's throughput was 3,316,560 lbs. (1480.60 gross tons) of raw metal material, from which Parkway netted 2,487,420 lbs. (1110.45 gross tons) of shredded steel, approximately 265,324.80 lbs. of non-ferrous recovery and 563,815.20 lbs. of waste (landfill material). As per the letter report from our environmental consulting firm, Envirosure dated July 13, 2017, annexed hereto as Exhibit B, this throughput analysis extrapolates to an estimated annual reduction in particulate matter emissions from 4,215 lbs. for the year to 15 lbs. total. The actual emissions from June 2017 and the projected total emissions from 2017 can be found in the July 13th letter report at Attachments A and B, respectively. As demonstrated by the July 13th letter report and analysis, the environmental and public health benefits achieved from implementation of the SEP have been obtained.

[SIGNATURE APPEARS ON NEXT PAGE]

5. 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 evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Dated: July 14 2017

COO

Andy Maybaum

660324.2

EXHIBIT A

Total Cost For Air System 07/06/2017

Vendor	Service	Amount
Riverside Engineering, Inc	System Equipment	$237,000.00
Higher Power Electrical Contracting	Electrical Installation	$56,600.00
Woods Industrial Services	Rigging, Welding & Installation	$48,717.23
United Rental	Equipment Rental (Man Lift)	$10,675.07
Parkway Iron & Metal	In House Labor (384.5 hrs @ $43.50	$16,943.25
Total Cost		$369,935.55

Riverside Engineering, Inc.

Metals recycling, design, fabrication & services

Please Remit to:

121 Interpark Blvd Ste 604 * San Antonio, Texas 78216
Telephone: (210) 227-9090 * Fax: (210) 227-7038
www.megashredder.com

INVOICE

INVOICE NUMBER:	0016366-IN
INVOICE DATE:	07/13/2016
INVOICE DUE DATE:	7/13/2016
TERMS:	Due On Receipt
MANAGER:	KW
CUSTOMER NO:	NJCLI01
JOB NUMBER:	0104-04A
Customers P.O.:	VBL ANDY

PARK STEIN INC
P.O. Box 2399
CLIFTON, NJ 07015

Ferrous Separation System

In 16600?

~~153805~~ new

JOB DESCRIPTION:
DS Upgrade, Cyclone, BH, Conv

JOB ADDRESS:
613-639 Route 46 East

CONTACT: STEVE FABIAN

COMMENT: 30% Down Payment

ORIGINAL CONTRACT AMOUNT:	225,000.00
PERCENTAGE COMPLETED TO DATE:	30.00%
BILLABLE CONTRACT AMOUNT:	67,500.00
LESS PREVIOUSLY INVOICED:	0.00
AMOUNT BILLED THIS INVOICE:	67,500.00
INVOICE TOTAL:	67,500.00

12/14/16 — 20,000.00 #8372 ✓

~~bal 47500.00~~

225,000.00
2/14/16 20,000.00 #8372
205,000.00 bal
6/17 — 175,000.00 # 8868 In 13605 Transfer from 613 Realty
~~30,000.00 bal~~

Ins 16416 bal 127,500
Ins 163.66 bal

Riverside Engineering, Inc.

Metals recycling, design, fabrication & services

Please Remit to:
121 Interpark Blvd Ste 604 * San Antonio, Texas 78216
Telephone: (210) 227-9090 * Fax: (210) 227-7038
www.megashredder.com

INVOICE

PARK STEIN INC
P.O. Box 2399
CLIFTON, NJ 07015

INVOICE NUMBER:	0016416-IN
INVOICE DATE:	01/26/2017
INVOICE DUE DATE:	1/26/2017
TERMS:	Due On Receipt
SALES PERSON:	KW
MANAGER:	KW
CUSTOMER NO:	NJCLI01
JOB NUMBER:	0104-04A
Customers P.O.:	VBL ANDY

JOB DESCRIPTION:
DS Upgrade, Cyclone, BH, Conv

JOB ADDRESS:
613-639 Route 46 East

CONTACT: STEVE FABIAN

COMMENT: 40% Progressive

ORIGINAL CONTRACT AMOUNT:	225,000.00
TOTAL CHANGE ORDERS:	12,000.00
REVISED CONTRACT AMOUNT:	237,000.00
PERCENTAGE COMPLETED TO DATE:	70.00%
BILLABLE CONTRACT AMOUNT:	165,900.00
LESS PREVIOUSLY INVOICED:	67,500.00
AMOUNT BILLED THIS INVOICE:	98,400.00
INVOICE TOTAL:	98,400.00

attn: Betty

HIGHER POWER ELECTRICAL CONTRACTING, LLC.

332 Van Dyke Ave. Haledon, NJ 07508
PH:973-904-9901 Cell: 973-296-3200
NJ LIC: # Bus Permit 14628

17200 3/3/17 ~~#8869~~ 8860 $5000 deposit

October 20, 2015

INVOICE # 102015

To: Parkway Iron & Metal
Job Location: 613-639 Rt. 46 East
Clifton, NJ 07015

5/25/17 #9319 $9000

We propose to furnish all material and perform all labor necessary to complete the following:

- Install dedicated 150A/480V/3-Phase Feeder circuit to new control panel
- Install dedicated control circuits for all motors
- Inter-lock new control circuitry with existing motor control circuitry
- Install dedicated conduits to new motors
- Install dedicated conduits to control panels and START/STOP stations
- Install 3 new motor control starters new motors
- Install new emergency stop system for new equipment conveyors
- Install dedicated conduit and wiring future PLC control options

*PRICE DOES NOT INCLUDE PLC PROGRAMMING OR PLC TERMINATIONS

All work to be completed in a substantial and workmanlike manner for the sum of FIFTY SIX THOUSAND SIX HUNDRED DOLLARS. Payments to be made as work progresses to the value of 100% of all work completed. The entire amount of the contract to be paid within 15 days after completion.

Any alterations or deviations from the above specifications involving extra cost of material and labor will only be executed upon written order for same and will become an extra charge over the sum mentioned in this contract. All agreements must be made in writing.

ACCEPTANCE: You are hereby authorized to furnish all material and labor required to complete the work mentioned in the above estimate for which _____ agree to pay the amount mentioned in said estimate and according to the terms thereof.

ESTIMATE TOTAL $56,600

Date:_____

Approved:_____

Thank you for your business.

Signature M. Figueroa 2/23/17

Initial work has been started. New main disconnect switch and conduits have been installed to new control panel location.

Request for $5000 deposit.

CONTRACTORS INVOICE

#982

WOOD'S INDUSTRIAL SERVICES
80 PARK ROW
WALLINGTON NJ 07057
973-223-7951

WORK PERFORMED AT:
Parkway Iron + Metal
Clifton NJ

TO:
Att: Steve

DATE	YOUR WORK ORDER NO.	OUR BID NO.
6-19-17	Cyclone + Box	

DESCRIPTION OF WORK PERFORMED

Wed 6-7	Bob	6-4	9½	$570
	IAN	6-4	9½	$475
Thu 6-8	Bob	6-3:30	8	$480
	IAN	6-4:00	9½	$475
Fri 6-9	Bob	6-3	8½	$510
	IAN	6-3	8½	$420
Sat 6-10	Bob	6-12	6	$360
	IAN	6-12	6	$300
	Justin	6-12	6	$300
Mon 6-12	Bob	9-3:30	6½	$390
Tue 6-13	Bob	6-4	9½	$570
	IAN	6-4	9½	$475
Wed 6-14	Bob	6-3:30	9	$540
	IAN	6-3:30	9	$450
Thu 6-15	Bob	7-3:30	8	$480
	IAN	7-3:30	8	$400
Fri 6-16	Bob	6-3:30	9	$540
	IAN	6-3:30	9	$450
Sat 6-17	Bob	7-12	5	$300
	IAN	7-12	5	$250
Mon 6-19	Bob	6-3	8	480
	IAN	6-3	8	400
				$9,615

All Material is guaranteed to be as specified, and the above work was performed in accordance with the drawings and specifications provided for the above work, and was completed in a substantial workmanlike manner for the agreed sum of _____ Dollars ($ _____).

This is a ☐ Partial ☐ Full invoice due and payable by: _____ Month _____ Day _____ Year

In accordance with our ☐ Agreement ☐ Proposal No. _____ Dated _____ Month _____ Day _____ Year

TC8122 MADE IN USA

CONTRACTORS INVOICE

CONTRACTORS INVOICE

17200

#982

WOOD'S INDUSTRIAL SERVICES
80 PARK ROW
WALLINGTON NJ 07057
973-223-7951

WORK PERFORMED AT:
Park Way Iron & Metal
Clifton NJ

TO:
att. Steve

DATE	YOUR WORK ORDER NO.	OUR BID NO.
6-19-17		

DESCRIPTION OF WORK PERFORMED

Total Labor 9615.00

Mat: Foam 6 Cans 24 Tubes
Silicon glove 8 grinding
8 cutoff Wheels
Total 296.23

Total Total $9911.23

Thanks Bob Wood

All Material is guaranteed to be as specified, and the above work was performed in accordance with the drawings and specifications provided for the above work, and was completed in a substantial workmanlike manner for the agreed sum of _____ Dollars ($ _____).

This is a ☐ Partial ☐ Full invoice due and payable by: _____ Month _____ Day _____ Year

in accordance with our ☐ Agreement ☐ Proposal No. _____ Dated _____ Month _____ Day _____ Year

TC8122
MADE IN USA

CONTRACTORS INVOICE

Air System

CONTRACTORS INVOICE

WOOD'S INDUSTRIAL SERVICES
50 PARK ROW
WALLINGTON NJ 07057
973-223-7951

WORK PERFORMED AT: # 981

Parkway Iron + Metal
Clifton NJ

TO: Att. Steve

DATE	YOUR WORK ORDER NO.	OUR BID NO.
6-5-17		

DESCRIPTION OF WORK PERFORMED

Job Cyclone + Z Box Install

Monday 5-22	Bob	6 h	$360
Tue 5-23	Bob	8.5	$510
	Helper	8.5	$297
Wed 5-24	Bob	8	$480
	Helper	8	$280
Thur 5-25	Bob	7.5	$450
	Helper	7.5	$262.50
Fri 5-26	Bob	7	$420
	Helper	7	$245.00
expendables		Total	85
Tues. 5-30	Bob	8	$480
	IAN	8	$400
Wed 5-31	Bob	1	$60
	IAN	8.5	$425
thur 6-1	BoB	7	$420
	IAN	8	$400
Fri 6-2	Bob	8	$480
	IAN	8	$400
Sat 6-2	Bob	5	$300
	IAN	5	$250
Mark Bob Wood		Total Total	$7,004.50

All Material is guaranteed to be as specified, and the above work was performed in accordance with the drawings and specifications provided for the above work, and was completed in a substantial workmanlike manner for the agreed sum of _____ Dollars ($ _____).

This is a ☐ Partial ☐ Full invoice due and payable by: _____ Month _____ Day _____ Year

In accordance with our ☐ Agreement ☐ Proposal No. _____ Dated _____ Month _____ Day _____ Year

TC8122 MADE IN USA

CONTRACTORS INVOICE

Air System

WOOD'S INDUSTRIAL SERVICES
[illegible] PARK ROW
WALLINGTON NJ 07057
973-[illegible]

PAID 6/2/17 #940

CONTRACTORS INVOICE

17200

WORK PERFORMED AT: #980

Parkway Iron & Metal
Clifton NJ

TO:
Att: Steve

DATE	YOUR WORK ORDER NO.	OUR BID NO.
5-22-17		

DESCRIPTION OF WORK PERFORMED

Job Cyclone + Z Box Installation

Sat. 5-6	Bob	4½	$300
	IAN	4½	$250
Tue 5-9	Bob	8½	$570
	IAN	8½	$425
Wed 5-10	Bob	9½	$570
	IAN	9½	$475
Thus 5-11	Bob	8½	$510
	IAN	8½	$425
Mon 5-15	Bob	8½	$510
	IAN	8½	$425
Tue 5-16	Bob	8	$480
	IAN	8	$400
Wed 5-17	Bob	9½	$570
	IAN	9½	$475
Fri 5-19	Bob	7	$420
	Ian	7	$350
Sat 5-20	Bob	6	$360
	Justin	6	$300

Thanks Bob Wood Total [redacted]

All Material is guaranteed to be as specified, and the above work was performed in accordance with the drawings and specifications provided for the above work, and was completed in a substantial workmanlike manner for the agreed sum of _____ Dollars ($ _____).

This is a ☐ Partial ☐ Full invoice due and payable by: _____ Month _____ Day _____ Year

In accordance with our ☐ Agreement ☐ Proposal No. _____ Dated _____ Month _____ Day _____ Year

TC8122 MADE IN USA

CONTRACTORS INVOICE

Air System

17200

CONTRACTORS INVOICE

#979 ①

WOOD'S INDUSTRIAL SERVICES
[illegible] PARK ROW
WALLINGTON NJ [illegible]
[illegible]

WORK PERFORMED AT:

Parkway Iron + Metal

TO

att Steve

#5184

Clifton N.J. #8401 50

DATE	YOUR WORK ORDER NO.	OUR BID NO.
5-5-17		

DESCRIPTION OF WORK PERFORMED

Rates Forman 60 Welder - Mech - 50 Helper 35

Job Cyclone + Conveyor Installation

Mon 4-24-17	Bob	9	$540
	IAN	9	$450
Wed 4-26-17	Bob	10	$600
	IAN	10	$500
Thur 4-27-17	Bob	9 1/2	$570
	IAN	9 1/2	$475
Fri 4-28-17	Bob	8	$480
	IAN	8	$400
Sat 4-29-17	Bob	5 1/2	$330
	IAN	5 1/2	$275
	Charley	5	$250
	John	5 1/2	$192.50
Mon 5-1-17	Bob	9 1/2	$570
	IAN	9 1/2	$475
Tue 5-2-17	Bob	8	$480
	IAN	8	$400
Wed 5-3-17	Bob	6 1/2	390
		6 1/2	325
		Total	7,702.50

All Material is guaranteed to be as specified, and the above work was performed in accordance with the drawings and specifications provided for the above work, and was completed in a substantial workmanlike manner for the agreed sum of _____ Dollars ($ _____).

This is a ☐ Partial ☐ Full invoice due and payable by: _____ Month _____ Day _____ Year

In accordance with our ☐ Agreement ☐ Proposal No. _____ Dated _____ Month _____ Day _____ Year

TC8122 MADE IN USA

CONTRACTORS INVOICE

CONTRACTORS INVOICE

#979 (2)

WOOD'S INDUSTRIAL SERVICES
80 PARK ROW
WALLINGTON NJ 07057
973-223-7951

7200

WORK PERFORMED AT:

Parkway IRON
& Metal
Clifton NJ

TO:

att Steve

DATE	YOUR WORK ORDER NO.	OUR BID NO.
5-5-17		

DESCRIPTION OF WORK PERFORMED

Job Cyclone + Conveyor Installation

Thurs 5-4-17 Bob 6h $360
IAN 6h $300

Supplies From A & L — $139.00
Bill # 0113646

Page 1 — 7,702.50

Total Total [redacted]

Thank You
Bob Wood

All Material is guaranteed to be as specified, and the above work was performed in accordance with the drawings and specifications provided for the above work, and was completed in a substantial workmanlike manner for the agreed sum of _____ Dollars ($ _____).

This is a ☐ Partial ☐ Full invoice due and payable by: _____ Month _____ Day _____ Year

In accordance with our ☐ Agreement ☐ Proposal No. _____ Dated _____ Month _____ Day _____ Year

TC8122
adams MADE IN USA

CONTRACTORS INVOICE

CONTRACTORS INVOICE

#978

WOOD'S INDUSTRIAL SERVICES
80 PARK ROW
WALLINGTON NJ 07057
973-223-7961

WORK PERFORMED AT:
Parkway Iron + Metal
Clifton N.

TO: Labor x Installation of Air System
att: Steve

DATE	YOUR WORK ORDER NO.	OUR BID NO.
4-24-17		

DESCRIPTION OF WORK PERFORMED

Rates Fanan - 60 Welder - 50 Helper 35

Job - Cyclone + Conveyor Installation

							Totals
4-12 - 4-15	T	W	Th	F	S	= ~~28hr~~	
F Bob	4	3	8	8	5	= 28hr	$1680
WM IAN			8	8	5	= 21 hr	$1,050
H Brandon		3	8	8	5	= 24 hr	$840
Mat. Expendables Paints + Silicone							$35.00
4-17 to 4-22nd	M	T	W	T	F	S	
F Bob	7	8	8	0	0	5	28hr $1,680
WM IAN	8	8	8	0	0	5	29hr $1,450
H Brandon	8	8	8	0	0	5	29hr $1,015
mat. expendables Wire Wheel Grinding Wheels							$33.00

Total Labor $7715.00
Total Mat. $68.00
Total Total $7783.00

All Material is guaranteed to be as specified, and the above work was performed in accordance with the drawings and specifications provided for the above work, and was completed in a substantial workmanlike manner for the agreed sum of _____ Dollars ($ _____).

This is a ☐ Partial ☐ Full invoice due and payable by: _____ Month _____ Day _____ Year

in accordance with our ☐ Agreement ☐ Proposal No. _____ Dated _____ Month _____ Day _____ Year

TC8122 MADE IN USA

CONTRACTORS INVOICE

Transaction Details Prepared for
Steven M Tendler
Account Number
XXXX-XXXXXX-77005

DATE	DESCRIPTION	AMOUNT
APR14 2017	UNITED RENTALS 000011225 - RIDGEFIELD PA, NJ 4/28/17 CK#-9154	$4,429.50
MAR29 2017	NASCO OP 103001002920866 - NEW PHILA, OH	$338.00
MAR21 2017	AMERICAN METAL MARKET LL 0043 - NEW YORK, NY	$1,890.00
MAR18 2017	DELTA WESTWOOD 2 - WESTWOOD, NJ	$33.53

Ma lift rental

Transaction Details Prepared for
Steven M Tendler
Account Number
XXXX-XXXXXX-77005

DATE	DESCRIPTION	AMOUNT
MAY16 2017	**UNITED RENTALS 000011225 - RIDGEFIELD PA, NJ**	$3,076.03 TMC

Doing business as:
UNITED RENTALS (NORTH AMERICA)
View Details on Merchant Website

222 BERGEN TPKE
RIDGEFIELD PARK
NJ
07660
UNITED STATES OF AMERICA (THE)

Man lift rental

Additional Information: 9999999 07013-
RENTAL DEPOSIT
Reference: 320171370884671498
Category: Business Services - Contracting Services

MAY3 2017	**NEW JERSEY E-Z PASS - 888-288-6865, NJ**	$485.00

Doing business as:
NEW JERSEY E Z PASS 888-288-6865
View Details on Merchant Website

375 MCCARTER HWY
NEWARK
NJ
07114
UNITED STATES OF AMERICA (THE)

Additional Information: TOLL & BRIDGE FEE
Reference: 320171230672424203
Category: Transportation - Tolls & Fees

Transaction Details
Description
FOR BILLING QUESTIO
ACCT: 10310222BILL

MAY1 2017	**LUKOIL ROUTE 46 0000 - ELMWOOD PARK, NJ**	$40.46

Doing business as:
LUKOIL ROUTE 46
68 ROUTE 46 E
ELMWOOD PARK
NJ

Transaction Details
Description
AUTOMATED GASOLINE

Transaction Details Prepared for
Steven M Tendler
Account Number
XXXX-XXXXXX-77005

DATE	DESCRIPTION	AMOUNT
JUN13 2017	NEW JERSEY E-Z PASS - 888-288-6865, NJ	$485.00
JUN13 2017	UNITED RENTALS 000011225 - RIDGEFIELD PA, NJ	$3,169.54 1700
MAY25 2017	NEW JERSEY E-Z PASS - 888-288-6865, NJ	$485.00
~~MAY23 2017~~	~~DELTA WESTWOOD 2 - WESTWOOD, NJ~~	$36.90

Man lift rental

EXHIBIT B

envirosure
SOLUTIONS, LLC
480.784.4621 | AZ
1929 E. BROADWAY | TEMPE, AZ 85282

July 13, 2017

Stuart Reiser, Esq.
ShapiroCroland
411 Hackensack Avenue
Hackensack, New Jersey 07601

RE: 12 Month Emissions Projection
Parkway Iron & Metal, Co.
639 US-46, Clifton, NJ 07013

Dear Mr. Reiser,

Per our discussion, please find the 12 month emissions projection for the year of 2017. The emissions estimates have been generated using the provided 2017 projected throughput and hours of operation. The emissions and emission reductions are in line with the December 2015 Proposed Supplemental Environmental Project – New Downstream Equipment for Increased Emission Control submission. The addition of the Airsort® System & enclosed transfer points achieves a reduction in particulate matter emissions from 4,215 pounds for the year to 15 pounds total. The actual emissions from June 2017 and the projected total emissions from 2017 can be found in Attachment A and Attachment B, respectively.

If you have questions or require further information, please contact me at your convenience.

Sincerely,

for

Robert Peshak, CHMM
Senior Scientist

Attachments: Attachment A – Actual PM Emission June 2017
Attachment B – 2017 Emissions Forecast

Attachment A

Actual PM Emission June 2017

PARKWAY IRON & METAL CO. - ACTUAL PM EMISSION JUNE 2017

Comparison of Typical Sorting/Cyclone System to New Airsort® System

June 2017 PM Emissions From Typical Z-Box Cyclone Module						Heavy Metals in Particulate Matter****			
Emission Source	(Tons / hr)	(Hrs /month)	(Tons)	* EF (Lbs / ton)	PM (Lbs / m)	Cadmium (Lbs/m)	Chromium (Lbs/m)	Lead (Lbs/m)	Mercury (Lbs/m)
Cyclone/Z-Box Emission Estimate	29.612	56	1,658	0.1065	177	0.00859	0.03241	0.45368	0.00304

Actual PM Fugitive Emissions from Open-Air Transfer Points							Heavy Metals in Particulate Matter****			
Emission Source	(Tons / hr)	(Tons / month)	** EF (Lbs / ton)	(Lb / month)	Drop points	PM (Lbs / m)	Cadmium (Lbs/m)	Chromium (Lbs/m)	Lead (Lbs/m)	Mercury (Lbs/m)
Open-Air Transfer Points (uncontrolled)	29	1,624	0.0030	4.9	6	29	0.00159	0.00536	0.07509	0.00050
					Total Emissions (lbs/month)	206	0.0112	0.0376	0.5288	0.0035

Actual PM Emissions From the Airsort® System & Enclosed Transfer Points							Heavy Metals in Particulate Matter****			
Emission Source	hours of operation	Flow Rate (m^3/hr)	Flow Rate (m^3/m)	***Pre-Filter PM Concentration (mg/m^3)	***Filter Efficiency @ PM-10	Post-Filter PM Emission (lb/m)	Cadmium (Lbs/m)	Chromium (Lbs/m)	Lead (Lbs/m)	Mercury (Lbs/m)
Airsort® Classifier with Enclosed Transfer Points and Dust Filter Unit	56	12,603	705,749	20	98%	1	0.0000	0.0001	0.0016	0.0000
					Total Emissions (lbs/month)	1	0.0000	0.0001	0.0016	0.0000
					Emissions Reduction (lbs/month)	205	0.0111	0.0377	0.5272	0.0035
					Emissions Reduction (tons/month)	0.103	0.0000	0.0000	0.0003	0.00000

Reference Notes:

* Cyclone/Z-Box EF from stack test of typical Cyclone/Z-Box at Comprehensive Steel, Sioux City, Iowa.

** Conveyor EF from Reference AP-42 Table 11.19.2-2, "Conveyor Transfer Point (uncontrolled)."

*** Pre-Filter PM Emissions and Filter Efficiency at PM-10 from Airsort® manufacturer-supplied stack test data summary for similar Dust Filter Unit with Polyester Needle-Fleece media.

**** Table 3.10, Shredder Residue Characteristics, from *Shredder Residue Environmental Information and Characterization Under RCRA*, W.Z. Baumgartner, 1992.

Attachment B

2017 Emissions Forecast

PARKWAY IRON & METAL CO. - 2017 EMISSIONS FORCAST

Comparison of Typical Sorting/Cyclone System to New Airsort® System

Monthly Typical

Monthly 2017 PM Emissions From Typical Z-Box Cyclone Module						Heavy Metals in Particulate Matter****			
Emission Source	(Tons / hr) estimate	(Hrs /month) estimate	(Tons)	* EF (Lbs / ton)	PM (Lbs / m)	Cadmium (Lbs/m)	Chromium (Lbs/m)	Lead (Lbs/m)	Mercury (Lbs/m)
Cyclone/Z-Box Emission Estimate	25	113.2	2,821	0.1065	300	0.01632	0.05514	0.77187	0.00517

Actual Monthly 2017 PM Fugitive Emissions from Open-Air Transfer Points							Heavy Metals in Particulate Matter****			
Emission Source	(Tons / hr) estimate	(Tons / month)	** EF (Lbs / ton)	(Lb / month)	Drop points	PM (Lbs / m)	Cadmium (Lbs/m)	Chromium (Lbs/m)	Lead (Lbs/m)	Mercury (Lbs/m)
Open-Air Transfer Points (uncontrolled)	25	2,821	0.0030	8.5	6	51	0.00276	0.00932	0.13046	0.00087
Total 2017 Monthly Emissions (lbs/month)						351	0.0191	0.0645	0.9023	0.0060

Annual Typical

2017 Annual Total PM Emissions From Typical Z-Box Cyclone Module						Heavy Metals in Particulate Matter****			
Emission Source	(Tons / hr)	(Hrs / yr)	(Tons)	* EF (Lbs / ton)	PM (Lbs / yr)	Cadmium (Lbs/yr)	Chromium (Lbs/yr)	Lead (Lbs/yr)	Mercury (Lbs/yr)
Cyclone/Z-Box Emission Estimate	25	1,358.5	33,858	0.1065	3,606	0.19580	0.66168	9.26314	0.06202

Actual 2017 Annual Total PM Fugitive Emissions from Open-Air Transfer Points							Heavy Metals in Particulate Matter****			
Emission Source	(Tons / hr)	(Tons / yr)	** EF (Lbs / ton)	(Lb / year)	Drop points	PM (Lbs / yr)	Cadmium (Lbs/yr)	Chromium (Lbs/yr)	Lead (Lbs/yr)	Mercury (Lbs/yr)
Open-Air Transfer Points (uncontrolled)	25	33,858	0.0030	101.6	6	609	0.03309	0.11183	1.56566	0.01048
Total 2017 Annual Emissions (lbs/year)						4,215	0.2289	0.7735	10.8287	0.0725

Parkway Annual

Actual 2017 Annual Total PM Emissions From the Airsort® System & Enclosed Transfer Points							Heavy Metals in Particulate Matter****			
Emission Source	hours of operation	Flow Rate (m^3/hr)	Flow Rate (m^3/m)	***Pre-Filter PM Concentration (mg/m^3)	***Filter Efficiency @ PM-10	Post-Filter PM Emission (lb/yr)	Cadmium (Lbs/yr)	Chromium (Lbs/yr)	Lead (Lbs/yr)	Mercury (Lbs/yr)
Airsort® Classifier with Enclosed Transfer Points and Dust Filter Unit	1,358.5	12,603	17,120,717	20	98%	15	0.0008	0.0028	0.0387	0.0003
Total 2017 Annual Emissions (lbs/year)						15	0.0008	0.0028	0.0387	0.0003
Emissions Reduction (lbs/year)						4,200	0.2281	0.7707	10.7900	0.0722
Emissions Reduction (tons/year)						2.100	0.0001	0.0004	0.0054	0.00004

Reference Notes:

* Cyclone/Z-Box EF from stack test of typical Cyclone/Z-Box at Comprehensive Steel, Sioux City, Iowa

** Conveyor EF from Reference AP-42 Table 11.19.2-2, "Conveyor Transfer Point (uncontrolled)."

*** Pre-Filter PM Emissions and Filter Efficiency at PM-10 from Airsort® manufacturer-supplied stack test data summary for similar Dust Filter Unit with Polyester Needle-Fleece media

**** Table 3.10, Shredder Residue Characteristics, from *Shredder Residue Environmental Information and Characterization Under RCRA*, W.Z. Baumgartner, 1992.

envirosure
SOLUTIONS, LLC
480.784.4621 | AZ
1929 E BROADWAY | TEMPE, AZ 85282

July 13, 2017

Stuart Reiser, Esq.
ShapiroCroland
411 Hackensack Avenue
Hackensack, New Jersey 07601

RE: 12 Month Emissions Projection
Parkway Iron & Metal, Co.
639 US-46, Clifton, NJ 07013

Dear Mr. Reiser,

Per our discussion, please find the 12 month emissions projection for the year of 2017. The emissions estimates have been generated using the provided 2017 projected throughput and hours of operation. The emissions and emission reductions are in line with the December 2015 Proposed Supplemental Environmental Project – New Downstream Equipment for Increased Emission Control submission. The addition of the Airsort® System & enclosed transfer points achieves a reduction in particulate matter emissions from 4,215 pounds for the year to 15 pounds total. The actual emissions from June 2017 and the projected total emissions from 2017 can be found in Attachment A and Attachment B, respectively.

If you have questions or require further information, please contact me at your convenience.

Sincerely,

for

Robert Peshak, CHMM
Senior Scientist

Attachments: Attachment A – Actual PM Emission June 2017
Attachment B – 2017 Emissions Forecast

envirosure SOLUTIONS, LLC.

Attachment A

Actual PM Emission June 2017

ENVIRONMENTAL HEALTH AND SAFETY SOLUTIONS

PARKWAY IRON & METAL CO. - ACTUAL PM EMISSION JUNE 2017

Comparison of Typical Sorting/Cyclone System to New Airsort® System

June 2017 PM Emissions From Typical Z-Box Cyclone Module						Heavy Metals in Particulate Matter****			
Emission Source	(Tons / hr)	(Hrs /month)	(Tons)	* EF (Lbs / ton)	PM (Lbs / m)	Cadmium (Lbs/m)	Chromium (Lbs/m)	Lead (Lbs/m)	Mercury (Lbs/m)
Cyclone/Z-Box Emission Estimate	29.612	56	1,658	0.1065	177	0.00959	0.03241	0.45368	0.00304

Actual PM Fugitive Emissions from Open-Air Transfer Points							Heavy Metals in Particulate Matter****			
Emission Source	(Tons / hr)	(Tons / month)	** EF (Lbs / ton)	(Lb / month)	Drop points	PM (Lbs / m)	Cadmium (Lbs/m)	Chromium (Lbs/m)	Lead (Lbs/m)	Mercury (Lbs/m)
Open-Air Transfer Points (uncontrolled)	29	1,624	0.0030	4.9	6	29	0.00159	0.00536	0.07509	0.00050
					Total Emissions (lbs/month)	206	0.0112	0.0378	0.5288	0.0035

Actual PM Emissions From the Airsort® System & Enclosed Transfer Points							Heavy Metals in Particulate Matter****			
Emission Source	hours of operation	Flow Rate (m^3/hr)	Flow Rate (m^3/m)	***Pre-Filter PM Concentration (mg/m^3)	***Filter Efficiency @ PM-10	Post-Filter PM Emission (lb/m)	Cadmium (Lbs/m)	Chromium (Lbs/m)	Lead (Lbs/m)	Mercury (Lbs/m)
Airsort® Classifier with Enclosed Transfer Points and Dust Filter Unit	56	12,603	705,749	20	98%	1	0.0000	0.0001	0.0016	0.0000
					Total Emissions (lbs/month)	1	0.0000	0.0001	0.0016	0.0000
					Emissions Reduction (lbs/month)	205	0.0111	0.0377	0.5272	0.0035
					Emissions Reduction (tons/month)	0.103	0.0000	0.0000	0.0003	0.00000

Reference Notes:

* Cyclone/Z-Box EF from stack test of typical Cyclone/Z-Box at Comprehensive Steel, Solux City, Iowa.

** Conveyor EF from Reference AP-42 Table 11.19.2-2, "Conveyor Transfer Point (uncontrolled)."

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Attachment B

2017 Emissions Forecast

PARKWAY IRON & METAL CO. - 2017 EMISSIONS FORCAST

Comparison of Typical Sorting/Cyclone System to New Airsort® System

Monthly Typical

Monthly 2017 PM Emissions From Typical Z-Box Cyclone Module							Heavy Metals in Particulate Matter****			
Emission Source	(Tons / hr) estimate	(Hrs /month) estimate	(Tons)	* EF (Lbs / ton)	PM (Lbs / m)		Cadmium (Lbs/m)	Chromium (Lbs/m)	Lead (Lbs/m)	Mercury (Lbs/m)
Cyclone/Z-Box Emission Estimate	25	113.2	2,621	0.1065	300		0.01632	0.05514	0.77187	0.00517

Actual Monthly 2017 PM Fugitive Emissions from Open-Air Transfer Points							Heavy Metals in Particulate Matter****			
Emission Source	(Tons / hr) estimate	(Tons / month)	** EF (Lbs / ton)	(Lb / month)	Drop points	PM (Lbs / m)	Cadmium (Lbs/m)	Chromium (Lbs/m)	Lead (Lbs/m)	Mercury (Lbs/m)
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Annual Typical

2017 Annual Total PM Emissions From Typical Z-Box Cyclone Module							Heavy Metals in Particulate Matter****			
Emission Source	(Tons / hr)	(Hrs / yr)	(Tons)	* EF (Lbs / ton)	PM (Lbs / yr)		Cadmium (Lbs/yr)	Chromium (Lbs/yr)	Lead (Lbs/yr)	Mercury (Lbs/yr)
Cyclone/Z-Box Emission Estimate	25	1,358.5	33,658	0.1065	3,608		0.19580	0.66168	9.26314	0.06202

Actual 2017 Annual Total PM Fugitive Emissions from Open-Air Transfer Points							Heavy Metals in Particulate Matter****			
Emission Source	(Tons / hr)	(Tons / yr)	** EF (Lbs / ton)	(Lb / year)	Drop points	PM (Lbs / yr)	Cadmium (Lbs/yr)	Chromium (Lbs/yr)	Lead (Lbs/yr)	Mercury (Lbs/yr)
Open-Air Transfer Points (uncontrolled)	25	33,658	0.0030	101.6	6	609	0.03309	0.11183	1.56560	0.01048
Total 2017 Annual Emissions (lbs/year)						4,215	0.2289	0.7735	10.8287	0.0725

Parkway Annual

Actual 2017 Annual Total PM Emissions From the Airsort® System & Enclosed Transfer Points							Heavy Metals in Particulate Matter****			
Emission Source	hours of operation	Flow Rate (m^3/hr)	Flow Rate (m^3/m)	***Pre-Filter PM Concentration (mg/m^3)	***Filter Efficiency @ PM-10	Post-Filter PM Emission (lb/yr)	Cadmium (Lbs/yr)	Chromium (Lbs/yr)	Lead (Lbs/yr)	Mercury (Lbs/yr)
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