From:	Zia, Humane
To:	Winek, Michael
Cc:	Willard, Erin; Burke, Shaun
Subject:	Metalico Pittsburgh, Inc.
Date:	Friday, December 10, 2021 3:04:42 PM
Attachments:	6-25-18 General Iron Stack Test - Results Letter.pdf 2020-01-16 USEPA GII RTO-Scrub Emis Test Rpt - test done 11-2019.pdf 201706_Schnitzer_Steel_Report_Public.pdf 201810_Schnitzer Steel Test Report_Public_Redacted.pdf 201901_Schnitzer_Steel_Report_005AS-452603A-Final-PUBLIC.pdf Schnitzer_Regulatory_Support_Document_Oct_2019.pdf image003.png

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Mike,

As a follow-up to our meeting with Metalico and you on December 2, 2021, EPA is providing the attached 6 documents, listed below, to further potential settlement discussions with Metalico concerning EPA's October 4, 2021 Notice of Violation (Docket No. CAA-003-22-0001). We request that Metalico and its representatives not publicly share these documents on websites, etc., due to the company/facility-specific nature of the information.

1. 6-25-18 General Iron Stack Test - Results Letter
2. 2020-01-16 USEPA GII RTO-Scrub Emis Test Rpt - test done 11-2019
3. 201706_Schnitzer_Steel_Report_Public
4. 201810_Schnitzer Steel Test Report_Public_Redacted
5. 201901_Schnitzer_Steel_Report_005AS-452603A-Final-PUBLIC
6. Schnitzer_Regulatory_Support_Document_Oct_2019

Documents #1 and #2 are stack test reports from General Iron in Chicago, Illinois, submitted to EPA under cover letters dated June 25, 2018 and January 16, 2020. Document #1 reports on testing conducted prior to the installation of an emission control system. Document #2 reports on testing done in November 2019, and has test results from the inlet and outlet of the emissions control system that was installed after the test summarized in Document #1.

Documents #3 through #6 are related to the Schnitzer facility in Oakland, California. Documents #3 through #5 are stack test reports for testing done in 2017, 2018 and 2019, respectively. In Documents #4 and #5, two separate tests were performed under different conditions. Documents #3 through #5 are redacted to protect information claimed as Confidential Business Information. Document #6 (October 2019) is not considered CBI and has been shared with state and local regulators in California and other states. EPA does not endorse the positions taken in this document, but we are providing it as additional supplemental detail to Documents #3, #4 and #5.

As discussed during our meeting, EPA believes that a VOCs emission factor in the range of 0.35 to 0.37 is appropriate for Metalico's Neville Island facility, based on information currently available to EPA, including but not limited to the attached reports. As a next step, we request that Metalico provide to us, by January 14, 2022, a proposal for the VOC value it plans to use in its emissions calculations in support of a revised Permit Application. We are available to answer questions and discuss the contents of these documents and how we used them to estimate emissions from scrap shredders.

We look forward to hearing from Metalico and to resolution of this matter.

Regards,

Humane Zia, Senior Assistant Regional Counsel
U.S. Environmental Protection Agency Region III
Office of Regional Counsel

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