

February 9, 2017

Julie Morita, M.D.
Commissioner, Department of Public Health & Environment
333 South State St., 2nd Floor
Chicago, IL 60604

Re: Second Amendment to Request for Variance from the Rules and Regulations for Control of Emissions from the Handling and Storage of Bulk Solid Materials-American Zinc Recycling (f/k/a Horsehead Corporation)

Dear Commissioner Morita:

Pursuant to Section 8.0 of Article II, Part E of the City of Chicago Department of Public Health's (the "Department") Rules and Regulations for Control of Emissions from the Handling and Storage of Bulk Solid Materials (the "Bulk Solid Materials Rules" or "Rules"), American Zinc Recycling ("AZR") submits this Second Amendment to its pending request for variance dated June 13, 2014, as amended by the Horsehead Corporation submission to the Department dated September 25, 2017, for its facility located in Chicago, Illinois (the "Chicago Plant").¹ This Second Amendment further amends the original June 2014 variance request to inform the Department of the following changes and developments relating to the variance relief requested:

1. Because of the corporate name change from "Horsehead Corporation" to "American Zinc Recycling Corp.," it is AZR who is now seeking a variance;

2. The coke materials enclosure structure required by Section 6.0(6) of the Bulk Solid Materials Rules has been completed but a separate plumbing issue relating to the water supply line to the fire hydrants has been identified by the City of Chicago and is being addressed by AZR; and

3. The completion of the coke material enclosure structure, and other operational changes at the Chicago Plant, provide additional factual support for the Department's decision to grant AZR's pending request for a variance from the fugitive dust monitors requirement in Section 3.0(4)(a)-(e).

¹ The June 16, 2014 variance request addressed Sections 3.0(2)(c), 3.0(4)(a)-(e), 3.0(8)(d), 5.0(2), 5.0(5), and 5.0(6)(d). As stated in Horsehead's February 19, 2015 Response to the Department's January 26, 2015 Request for Additional Information, Horsehead has completed the activities for which its 2014 variance request sought an extension of time.

Each of the above developments and accomplishments are described in further detail below.

I. Corporate Name Change from Horsehead to AZR

On May 1, 2017, the corporate name “Horsehead Corporation” was changed to “American Zinc Recycling Corp.” The change was limited to a change in the name of the corporation. There were no changes to the corporate structure. Therefore, AZR, formerly known as Horsehead, amends its pending variance request to submit that the Department grant AZR, rather than Horsehead, a variance from the following requirements of the Bulk Solid Materials Rules:

(1) the fugitive dust monitors requirement in Section 3.0(4)(a)-(e) of the Bulk Solid Materials Rules;

(2) an extension of the coke materials enclosure deadline to within fourteen (14) days of the issuance of the certificate of occupancy for the enclosure structure by the City of Chicago;

(3) the requirement in Section 5.0(6)(d) to prevent “any” pooling of water at the facility to allow the temporary occurrence of pooling water in areas in the southern portion of the facility following rainfall events; and

(4) the requirement in Section 5.0(5)(b) to use Chemical Stabilizers and/or water heating systems when temperatures fall below 32° F for its IRM storage piles.

II. Request for Variance to Extend the Enclosure Deadline in Rules Section 6.0(6)

Horsehead, now AZR, has a pending request for relief from the enclosure deadline established in Section 6.0(6) of the Rules. Section 6.0(6) requires AZR to remove or fully enclose all coke and coal bulk materials within two years following the submission of its Enclosure Plan. That deadline was June 11, 2016. AZR diligently pursued the completion of the design, permitting and construction of its coke materials enclosure building. It worked cooperatively with representatives of the Department, the City Fire Department and the City Building Department to complete the enclosed coke materials building. AZR has regularly provided monthly progress reports to the Department concerning the status and progress in completing the structure. Construction of the enclosure structure was completed before the end of 2017. However, in the course of the City’s inspection of the completed enclosure structure for purposes of issuing a certificate of occupancy, the City identified a separate issue relating to the existing water supply line to the fire hydrants at the facility which has delayed issuance of the occupancy certificate. AZR is working cooperatively with the City to address this water supply line issue and upon its completion, it reasonably expects the certificate to be issued. Therefore, AZR is requesting that the Department grant a variance extending the deadline in Section 6.0(6) of the Rules for the completion of the coke materials enclosure to within fourteen days of the issuance of the certificate of occupancy by the City in order to allow a reasonable amount of time

to transfer the existing coke materials, and any new coke material deliveries, into the new enclosure structure once that certificate is issued.

A. Description of the Coke Materials Enclosure Construction Completion

AZR completed the coke materials enclosure structure at a substantial cost, estimated at approximately \$2 million. The enclosure structure is approximately 5,725 square feet. It is equipped with an overhead door which allows trucks bringing in the coke to the Chicago Plant to enter the building and unload the coke within the enclosure structure. The design and construction of the enclosure were closely reviewed by the City Building Department. In addition, the fire protection system, including the existing water supply line and fire hydrants locations, also was reviewed by the City's Fire Department.

The enclosure building was completed in May 2017. However, in April 2017, an unexpected issue arose regarding the process water lines at the plant and the potential need for a new water supply line for the building fire pump. After it was determined that a new water supply line was needed, the construction of this line was delayed due to another unforeseen development. The City required a change in the location of the firewater access, which in turn required a new permit for the water supply line. After obtaining the new permit, construction of the plumbing commenced this past summer but a City plumbing inspector halted construction of the water supply line and requested a copy of the enclosure plumbing drawings prior to allowing construction of the line to commence. Preliminary plumbing design drawings were submitted to the City and a meeting with the City Fire Department's engineering personnel was held to review the design. The Fire Department agreed the preliminary plumbing design drawings were accepted but also requested that the fire hydrant location plan for the Chicago Plant be submitted for review. A fire hydrant location plan has been submitted to the Fire Department.

The solution to the fire water supply line issue necessitates performing a significant plumbing project to install new fire hydrants and lines to those hydrants. Due to the onset of winter and ground freezing conditions, the field work to complete this plumbing project could not be completed before the end of 2017. It will be completed once all City approvals and permits are obtained and the ground conditions are suitable for performing the work. It is reasonably expected that this can be accomplished prior to June 2018. Upon the City's issuance of a certificate of occupancy for the enclosure structure, AZR will transfer the coke materials used in its on-site operations into the enclosure.

An updated Chicago Plant diagram showing the location of the new enclosure building is attached as Exhibit A. Because the enclosure building cannot yet be used, the updated Chicago Plant diagram continues to show the coke storage area.

Once the certificate of occupancy for the enclosure structure is issued, all new coke materials received at the Chicago Plant will be conveyed by truck into the enclosure building for

storage. All coke materials used in the Chicago Plant operations will be moved by front end loader from the enclosure building directly to the coke hopper. None of the relatively small quantities of coke materials,² which currently consist solely of petcoke,³ used in the Chicago Plant operations will be stored outside. As previously explained in the original and amended variance request, all coke materials are consumed in the AZR production process. The full enclosure of all coke materials will further reduced the Chicago Plant's potential for fugitive dust emissions.

B. The Extension of the Enclosure Deadline in Section 6.0(6) has not Caused a Nuisance or Adversely Affect the Surrounding Community (§ 8.0(2)(d)).

Section I.C. (at pp. 3-4) of the September 2015 Amended Variance Request described in detail why the granting of the requested extension of the enclosure deadline in Section 6.0(6) of the Rules would not cause a nuisance or adversely affect the surrounding community. All of the information previously provided to show that no nuisance or adverse effect on the surrounding community would occur has proven to be true. There were no, and have not subsequently been, complaints of any kind received from residents in the surrounding community. The interim precautionary measures that were taken which significantly reduced the surface area of the stored coke (using two piles instead of three) and the added concrete barriers around the remaining coke storage areas maximized the containment of coke material and reduction of fugitive emissions from that material during their limited outdoor storage period. The limited quantity of coke material on site, the protected location of the coke storage piles, their high moisture content, and their large particle size all contributed to preventing or minimizing any fugitive emissions from the coke materials. As represented in the 2015 Amended Variance Request, the Chicago Plant has remained in compliance with all applicable fugitive particulate matter emissions requirements in its Illinois Title V Air Permit issued in May 2002.⁴ Finally, continued quarterly opacity testing at the Chicago Plant from 2015 to the present did not identify any exceedances of the applicable opacity limits within the facility and repeated testing pursuant to Method 22 detected no visible emissions at the property line of the Plant. The changes to the Chicago Plant's operating procedures to comply with the City's Rules have further reduced fugitive

² Under the terms of the July 2, 2015 Provisional Administrative Order Pertaining to Coke & Coal Bulk Material Uses issued to Horsehead by the City's Commissioner of Planning and Development, the total daily amount of coke or coal materials present at the Chicago Plant "shall not exceed 4,516 tons at any one time" and the annual receipt of coke materials is limited to 52,808 tons.

³ As explained in Horsehead's September 25, 2015 Amended Variance Request (at p. 2), Horsehead agreed to a request by the United States Environmental Protection Agency to limit its petcoke use to 10% by weight. Notwithstanding the ability to use 10% petcoke, Horsehead has not been using any petcoke in its manufacturing process since agreeing to the U.S. EPA's request in 2015.

⁴ The relevant requirements of the Illinois Title V Air permit were described in the September 2015 Amended Variance Request at pp. 4-5.

emissions such that the typical opacity results for on-site handling activities is zero emissions. Copies of the opacity test results for the last two quarters of 2017 are included as Exhibit B.⁵

C. The Proposed Methods to Achieve Compliance with the Regulations will be Successfully Completed. (§ 8.0(2)(f))

As required by Section 8.0(2)(f) of the Rules, Horsehead proposed to complete the enclosure building in cooperation with the City Building and Fire Departments in a diligent manner. It has done so. Although unexpected and unforeseen developments have occurred during the process, AZR continually kept the Department informed of these developments and its progress in resolving all issues that arose through monthly progress reports. The Chicago Plant also complied with all other provisions of the Bulk Solids Rules, save those identified in its pending variance request.

D. Alternative Methods and Factors Influencing the Choice of Applying for a Variance (§ 8.0(2)(g))

The information presented in the September 2015 Amended Variance Request is unchanged and is hereby incorporated by reference.

E. Statement Regarding the Person's Current Status as Related to the Subject Matter of the Variance Request (§ 8.0(2)(h))

AZR has complied with the enclosure requirement of the City's Rules. However, it requests that the Department grant it the requested variance to extend the deadline in Section 6.0(6) of the Rules to within fourteen (14) days of the City's issuance of the certificate of occupancy, which is expected to occur by June 2018.

III. Second Amendment to Variance Request from the Fugitive Dust Monitors Requirements of Section 3.0(4)(a)-(e) of the Bulk Solid Materials Rules.

AZR requests that the Department consider the new information presented in this Second Amendment in its consideration of Horsehead's prior request for a variance from the fugitive dust monitors requirement of Section 3.0(4)(a)-(e) of the Bulk Solid Materials Rules. The enclosure structure is completed and the outside storage of coke material used in the Chicago Plant's production process will cease upon issuance of a certificate of occupancy for the enclosure structure. As stated above, continued quarterly opacity testing shows consistent compliance with fugitive emissions limits. Further, the quantity of coke materials received at the Chicago Plant also has remained in consistent compliance with the limits imposed under the City's Provisional Throughput Order.

⁵ Due to their voluminous nature, the opacity test results for all quarters of testing are not included here. However, Horsehead will provide any or all of the additional opacity testing reports upon the Department's request.

The only outside storage activity involving bulk solid materials that will remain at the Chicago Plant are the Iron Rich Material (“IRM”) product storage piles. As explained in detail in the 2014 original Variance Request, the IRM material stored outside forms a crust which minimizes the potential for airborne release from these piles. AZR’s dust suppression system has proven successful at protecting against off-site emissions during the handling of IRM on-site. As previously stated, the Chicago Plant continues to perform all of the other requirements of the City’s Rules for preventing or minimizing airborne emissions of IRM. The limited handling activities associated with the IRM product do not warrant or justify the imposition of the fugitive air monitors requirement under the Rules.

IV. Limited Updates to the Chicago Plant Information Previously Provided in Support of the Variance Request.

With limited exception, the information required by Section 8 of the Bulk Solid Materials Rules which was included in the Original and Amended variance requests is still accurate today. With regard to the Original Variance Request’s description of the quantities and types of materials, processes and activities for which the variance is requested (see Original Variance Request at Section II & Exhibits A + B and Section III), as required by Rules Sections 8.0(2)(b) and § 8.0(2)(c)), the types of materials and the production processes at the Chicago Plant have not changed. The Chicago Plant still uses Electric Arc Furnace dust (EAF dust) and coke materials⁶ to produce Waelz Oxide (WOX) and IRM product. EAF dust is received by railcars and trucks directly into the Conditioning & Blending (“C&B”) Building, which provides full enclosure for the receipt and handling of this material. EAF dust is offloaded and processed in the recycling operation within fully enclosed facilities and equipment to produce the WOX and IRM. As stated in the Original Variance Request, all EAF dust is contained indoors.

Various areas of the recycling operation conducted in the C&B Building are vented through baghouses with permitted stack emissions. WOX product is captured in fabric filter product collectors (baghouses). Emissions from these product collectors are regulated under the terms of the facility’s existing Clean Air Act Title V Permit. The facility has 24-hour opacity monitors to measure if particulate matter is emitted from the product collector stacks at above permitted levels. Alarms alert plant personnel if limits are exceeded, and the affected part of the product collector is shut down for repairs. Hence, the previous description of the production processes provided is hereby incorporated by reference.

There have been limited changes in the handling of bulk solids materials at the Chicago Plant which are relevant to the pending request for variance. These changes relate only to the handling of IRM. No changes have been made to the handling of WOX, which is still conveyed from the product collectors via an enclosed conveyor to a loading chute that extends into closed,

⁶ As stated above, the Chicago Plant presently uses 100% metallurgical coke, and has voluntarily limited future coke use to a ratio of 90% metallurgical coke to 10% petroleum coke.

pressure differential rail cars for off-site shipment. These railcars also are in an enclosed building. The WOX is never exposed to the outdoors.

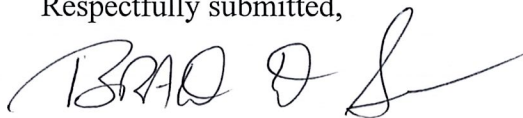
The changes to the IRM handling operations involve minor changes in how the IRM is temporarily stored for testing of product quality (*i.e.*, whether product specifications are met) prior to being loaded for off-site transfer or moved to the IRM storage piles on the southern portion of the Plant property to await future off-site transfer. IRM product is removed from the kilns, transferred by pay loader and placed into either a silo or a storage pile in a designated area near the kilns. After testing, the IRM is moved by a pay loader to one of three areas. Two of those areas are temporary storage areas located close to the barge loading area from which the IRM is then loaded directly onto barges via an enclosed conveyor system. The third area is the IRM storage piles area on the southern portion of the property. Each of these three storage area are shown on the updated Chicago Plant diagram attached as Exhibit A. As before, fugitive emissions, if any, are controlled with water suppression when moving and loading IRM at the facility. When the IRM is removed from the silos for transfer to one of the three storage areas, water suppression is used as a precautionary measure on IRM piles to further reduce the potential for emissions from movement of IRM on site, as described in AZR's written fugitive dust control plan previously submitted to the Department. The application of water to the IRM accelerates the formation of the crust on the surface of the IRM, which is typically about 4-5 inches thick.

V. Conclusion

AZR is working cooperatively with the City of Chicago's Fire and Building Departments to address the water supply line and hydrants issue so that it can obtain the certificate of occupancy for the enclosure structure as soon as possible. Because the completion of the enclosure project depends on certain factors beyond AZR's control, such as the issuance of permits and weather conditions, AZR is requesting that the requested variance for the extension of the enclosure structure's completion deadline be tied to the issuance of the certificate of occupancy. It is not possible to predict with certain a specific date by which that certificate will be issued, but it is reasonably expected to be accomplished by June 2018. There have not been any other significant changes to the Chicago Plant's operations, and any changes relevant to the variance relief requested by AZR have been identified in this submission.

AZR respectfully submits that it has satisfied the requirements for a variance in Section 8.0 of the Rules and requests that the Commissioner grant the requested variance relief for the reasons described above.

Respectfully submitted,

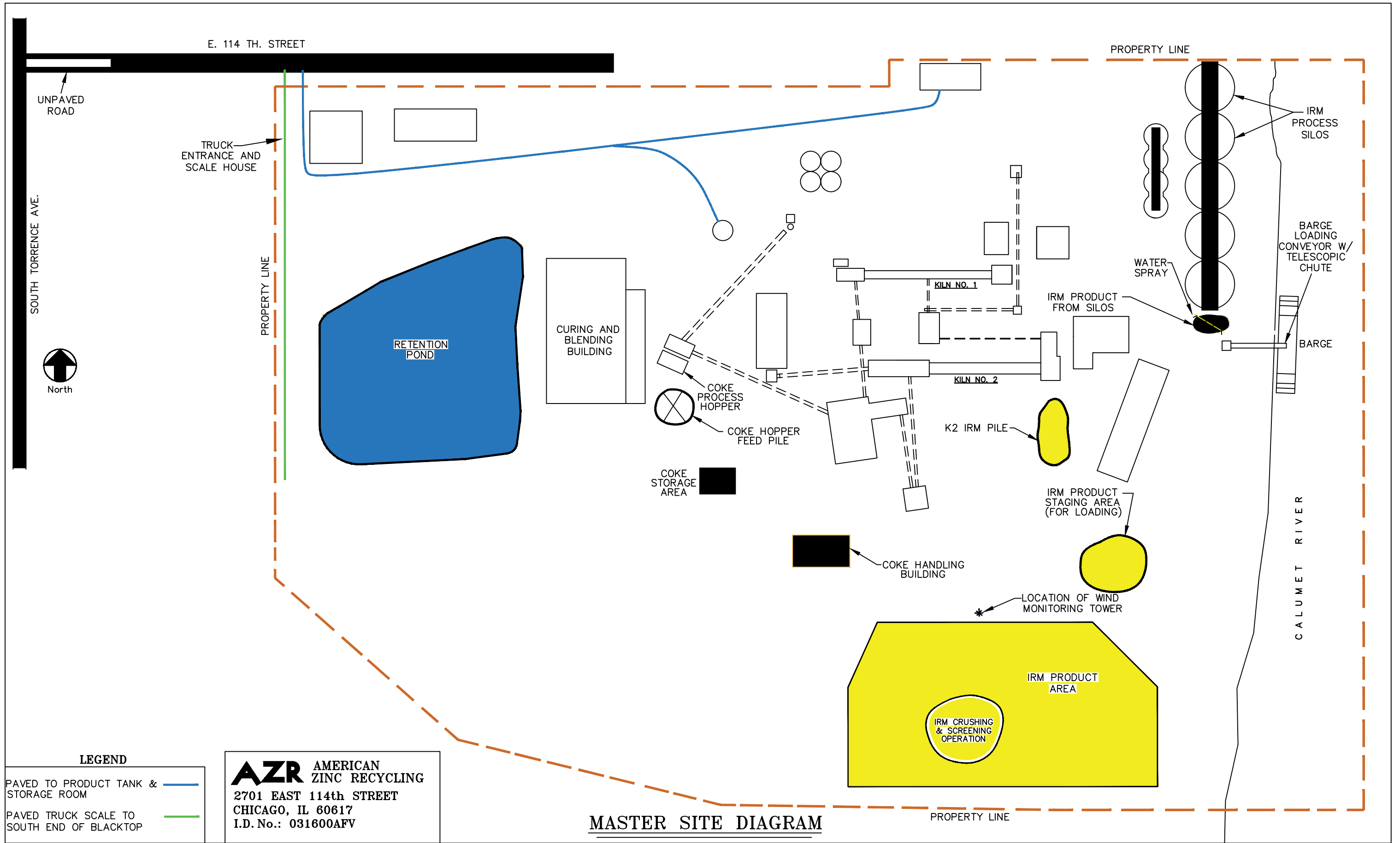


Brad Sutek
Plant Manager

EXHIBIT A

To Second Amendment to

AZR's Request for Variance



LEGEND

- PAVED TO PRODUCT TANK & STORAGE ROOM —
- PAVED TRUCK SCALE TO SOUTH END OF BLACKTOP —

AZR AMERICAN ZINC RECYCLING
 2701 EAST 114th STREET
 CHICAGO, IL 60617
 I.D. No.: 031600AFV

MASTER SITE DIAGRAM

EXHIBIT B

To Second Amendment to

AZR's Request for Variance

American Zinc Recycling – MTL-XXXX
Quarterly Visible Emissions and Opacity Summary

DATE: 9/5/17

BAGHOUSE ID#: ~~000~~ Quarterly Opacity

TIME: ALL DAY

INSPECTED BY: Shannon Andrews

Instructions: This checklist is to be used by site personnel as a guide to perform visible emissions and opacity observations. Walk-around inspections should not be limited to only items included on this form. Any corrective actions required are to be reported on this form. Comments / concerns on this form should be kept brief and concise.

Quarterly Visible Emissions and Opacity Summary

Location	Type of Fugitive Emissions Source	Duration of Observation (Minutes)	Average Opacity (%)
✓ Coke Hopper <input checked="" type="checkbox"/>	Fugitive	30 min	0
✓ Off Spec Coke Pile <input checked="" type="checkbox"/>	Fugitive	30 min	0
Temp. IRM Storage Pile (East of Coke Plant) <input checked="" type="checkbox"/>	N/A		
✓ Temporary IRM Storage Pile <input checked="" type="checkbox"/>	Fugitive	7 min	0
✓ Main IRM Storage Pile <input checked="" type="checkbox"/>	Fugitive	30 min	0
✓ Coke Loading Pile <input checked="" type="checkbox"/>	Fugitive	14 min	0
West Coke Pile	N/A		
East Coke Pile	N/A		
✓ Main IRM Storage Bunkers <input checked="" type="checkbox"/>	Fugitive	7 min	0

Location	Type of Fugitive Emissions Source	Duration of Observation (Minutes)	Average Opacity (%)
IRM Truck Loading	N/A		
✓ Paved Road - Main Truck Road	TRAFFIC EMISSION	60 min	0
✓ Parking Lot	TRAFFIC EMISSION	60 min	0
○ Paved Road - To IRM Truck Loading	TRAFFIC EMISSION	60 min	0
✓ Unpaved Road - Section of 114 th Street	TRAFFIC EMISSION	60 min	0
✓ Property Line Locations (Method 22)	FUGITIVE	1 hour	0
✓ IRM Barge Loading Hopper and Loading Conveyor/Chute	MATERIAL TRANSFER	60 min	0
✓ IRM Barge Loading Hopper	MATERIAL TRANSFER	60 min	0
✓ IRM Barge Loading Conveyor/Chute	MATERIAL TRANSFER	60 min	0

CORRECTIVE ACTIONS TAKEN	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
DID YOU GENERATE A WORK ORDER	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

DOCUMENT REPAIRS MADE BELOW.

PLEASE ADD ANY ADDITIONAL NOTES BELOW

No observable emissions from opacity event
 weather 70's, w/no @ 9 mph WNW

Visible Emissions Observations Form

SOURCE NAME American Zinc Recycling (Chicago Plant)			OBSERVATION DATE 9/5/17				START TIME		STOP TIME				
ADDRESS 2701 East 114th Street			SEC	0	15	30	45	SEC	0	15	30	45	
			MIN					MIN					
CITY Chicago			STATE IL		ZIP 60617		1	0	0	0	0	31	
PHONE			SOURCE ID NUMBER 031600AFV		2	0	0	0	0	0	32		
PROCESS EQUIPMENT Coke loading pile			OPERATING MODE loading		3	0	0	0	0	0	33		
CONTROL EQUIPMENT H ₂ O TRUCK AS NEEDED			OPERATING MODE		4	0	0	0	0	0	34		
DESCRIBE EMISSION POINT START Coke loading pile					5	0	0	0	0	0	35		
HEIGHT ABOVE GROUND LEVEL 12 ft			HEIGHT RELATIVE TO OBSERVER START 12 ft STOP 12 ft		6	0	0	0	0	0	36		
DISTANCE FROM OBSERVER START 30 ft STOP 30 ft			DIRECTION FROM OBSERVER START SW STOP SW		7	0	0	0	0	0	37		
DESCRIBE EMISSIONS START None			STOP none		8	0	0	0	0	0	38		
EMISSION COLOR START N/A			PLUME TYPE: CONTINUOUS <input type="checkbox"/>		9	0	0	0	0	0	39		
WATER DROPLETS PRESENT: NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>			IF WATER DROPLET PLUME: ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>		10	0	0	0	0	0	40		
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START 3 ft			STOP 3 ft		11	0	0	0	0	0	41		
DESCRIBE BACKGROUND START sky			STOP sky		12	0	0	0	0	0	42		
BACKGROUND COLOR START Blue			SKY CONDITIONS START Cloudy		13	0	0	0	0	0	43		
WIND SPEED START 9			WIND DIRECTION START WNW		14	0	0	0	0	0	44		
AMBIENT TEMP START 70			WET BULB TEMP		15						45		
RH.percent					16						46		
Source Layout Sketch			Draw North Arrow		17						47		
<p>The sketch shows an 'Emission Point' marked with an 'X' at the top. Below it is the 'Observers Position'. A 'Sun Location Line' is drawn at a 140-degree angle from the observers position. Wind direction is indicated by arrows pointing right, labeled 'Sun', 'Wind', 'Plume and Stack'.</p>					18						48		
					19						49		
					20						50		
					21						51		
					22						52		
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					26						56		
					27						57		
					28						58		
					29						59		
					30						60		
					AVERAGE OPACITY FOR HIGHEST PERIOD				NUMBER OF READINGS ABOVE HIGHEST PERIOD				
					0				100 % WERE 0				
					RANGE OF OPACITY READINGS				MINIMUM				
					0				MAXIMUM 0				
					OBSERVER'S NAME (PRINT)								
					S. Andrews								
					OBSERVER'S SIGNATURE				DATE				
					[Signature]				9/5/17				
					ORGANIZATION								
					AZR								
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE					CERTIFIED BY:				DATE				
TITLE			DATE		VERIFIED BY:				DATE				

Visible Emissions Observations Form

SOURCE NAME American Zinc Recycling (Chicago Plant)			OBSERVATION DATE 9/5/17				START TIME		STOP TIME							
ADDRESS 2701 East 114th Street			SEC	0	15	30	45	MIN	SEC	0	15	30	45			
CITY Chicago			STATE IL		ZIP 60617		1	0	0	0	0	31				
PHONE			SOURCE ID NUMBER 031600AFV		2	0	0	0	0	0	32					
PROCESS EQUIPMENT IRM Bunkers			OPERATING MODE UND		3	0	0	0	0	0	33					
CONTROL EQUIPMENT H2O TRUCK			OPERATING MODE UND		4	0	0	0	0	0	34					
DESCRIBE EMISSION POINT START IRM BUNKER					5	0	0	0	0	0	35					
HEIGHT ABOVE GROUND LEVEL START 8 FT			HEIGHT RELATIVE TO OBSERVER START 8 FT STOP 8 FT		6	0	0	0	0	0	36					
DISTANCE FROM OBSERVER START 50 FT STOP 50 FT			DIRECTION FROM OBSERVER START NNW STOP NNW		7	0	0	0	0	0	37					
DESCRIBE EMISSIONS START NONE STOP NONE					8						38					
EMISSION COLOR START N/A STOP N/A			PLUME TYPE: CONTINUOUS <input type="checkbox"/>		9						39					
WATER DROPLETS PRESENT: NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>			FUGITIVE <input checked="" type="checkbox"/> INTERMITTENT <input type="checkbox"/>		10						40					
			IF WATER DROPLET PLUME: ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>		11						41					
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START 4 FT STOP 4 FT					12						42					
DESCRIBE BACKGROUND START TAN STOP TAN					13						43					
BACKGROUND COLOR START STOP			SKY CONDITIONS START STOP		14						44					
WIND SPEED START STOP			WIND DIRECTION START STOP		15						45					
AMBIENT TEMP START STOP			WET BULB TEMP RH.percent		16						46					
<p>Source Layout Sketch</p> <p>Draw North Arrow</p> <p>The sketch shows an 'Emission Point' marked with an 'X' at the top. Below it is the 'Observers Position'. A dashed line labeled 'Sun Location Line' is drawn at a 140-degree angle from the line connecting the emission point and observers. To the left, a compass rose indicates 'Sun' (circle with dot), 'Wind' (arrow), and 'Plume and Stack' (two lines).</p>					17						47					
					18								48			
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		28									58					
		29									59					
		30									60					
AVERAGE OPACITY FOR HIGHEST PERIOD			0		NUMBER OF READINGS ABOVE % WERE			0								
RANGE OF OPACITY READINGS			0		MINIMUM			0								
OBSERVER'S NAME (PRINT)			Shannon Andrews		OBSERVER'S SIGNATURE			DATE 9/5/17								
COMMENTS					ORGANIZATION			AZR								
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE					CERTIFIED BY:			DATE								
TITLE			DATE		VERIFIED BY:			DATE								

SOURCE NAME			OBSERVATION DATE				START TIME		STOP TIME	
American Zinc Recycling (Chicago Plant)			9/15/17				700 a		800 a	
ADDRESS			SEC				MIN		SEC	
2701 East 114th Street			MIN				0		0	
			0				15		30	
			15				45		0	
			30				31		0	
			45				32		0	
CITY			STATE				ZIP			
Chicago			IL				60617			
PHONE			SOURCE ID NUMBER							
			031600AFV							
PROCESS EQUIPMENT			OPERATING MODE							
Barge loading Convey			loading							
CONTROL EQUIPMENT			OPERATING MODE							
H2O spray & Hopper			working							
DESCRIBE EMISSION POINT										
START			STOP							
enclosed conveyor in Barge										
HEIGHT ABOVE GROUND LEVEL			HEIGHT RELATIVE TO OBSERVER							
START			START							
15			15 STOP 15							
DISTANCE FROM OBSERVER			DIRECTION FROM OBSERVER							
START			START							
60 STOP 60			West STOP							
DESCRIBE EMISSIONS										
START			STOP							
NONE			NONE							
EMISSION COLOR			PLUME TYPE: CONTINUOUS <input type="checkbox"/>							
START			FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>							
STOP										
WATER DROPLETS PRESENT:			IF WATER DROPLET PLUME:							
NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>			ATTACHED <input type="checkbox"/> DETACHED <input checked="" type="checkbox"/>							
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED										
START			STOP							
2ft			2ft							
DESCRIBE BACKGROUND										
START			STOP							
Sky			Sky							
BACKGROUND COLOR			SKY CONDITIONS							
START			START							
Blue			Clear							
WIND SPEED			WIND DIRECTION							
START			START							
9 STOP 9			W/W							
AMBIENT TEMP			WET BULB TEMP				RH.percent			
START										
20 STOP 20										
Source Layout Sketch			Draw North Arrow							
AVERAGE OPACITY FOR HIGHEST PERIOD			NUMBER OF READINGS ABOVE							
0			100% WERE				0			
RANGE OF OPACITY READINGS			MINIMUM				MAXIMUM			
0			0				0			
OBSERVER'S NAME (PRINT)			OBSERVER'S SIGNATURE				DATE			
			Shannon Andrews				9/15/17			
COMMENTS			ORGANIZATION							
			AZR							
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE			CERTIFIED BY:				DATE			
TITLE			DATE				VERIFIED BY:		DATE	

Visible Emissions Observations Form

SOURCE NAME American Zinc Recycling (Chicago Plant)			OBSERVATION DATE 9/5/17				START TIME		STOP TIME			
ADDRESS 2701 East 114th Street			SEC	0	15	30	45	MIN	0	15	30	45
CITY Chicago			STATE IL		ZIP 60617		1	0	15	30	45	31
PHONE			SOURCE ID NUMBER 031600AFV		2	0	15	30	45	32		
PROCESS EQUIPMENT Temp Iron Storage			OPERATING MODE VAD		3	0	15	30	45	33		
CONTROL EQUIPMENT H ₂ O Slay			OPERATING MODE Filling		4	0	15	30	45	34		
DESCRIBE EMISSION POINT Stack plume					5	0	15	30	45	35		
HEIGHT ABOVE GROUND LEVEL 6 ft			HEIGHT RELATIVE TO OBSERVER START 6 STOP 6 ft		6	0	15	30	45	36		
DISTANCE FROM OBSERVER START 30 STOP 30			DIRECTION FROM OBSERVER START NW STOP NW		7	0	15	30	45	37		
DESCRIBE EMISSIONS START NONE STOP NONE					8	0	15	30	45	38		
EMISSION COLOR START N/A STOP			PLUME TYPE: CONTINUOUS <input type="checkbox"/> FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>		9	0	15	30	45	39		
WATER DROPLETS PRESENT: NO <input type="checkbox"/> YES <input checked="" type="checkbox"/>			IF WATER DROPLET PLUME: ATTACHED <input checked="" type="checkbox"/> DETACHED <input type="checkbox"/>		10	0	15	30	45	40		
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START 3 ft STOP 3 ft					11	0	15	30	45	41		
DESCRIBE BACKGROUND START None Coke Bld STOP Coke Bld					12	0	15	30	45	42		
BACKGROUND COLOR START Gray STOP Gray			SKY CONDITIONS START Cloudy		13	0	15	30	45	43		
WIND SPEED START 9 STOP 9			WIND DIRECTION START WNW STOP WNW		14	0	15	30	45	44		
AMBIENT TEMP START 7 STOP 0			WET BULB TEMP		15	0	15	30	45	45		
RH. percent					16	0	15	30	45	46		
<p>Source Layout Sketch</p> <p>Draw North Arrow</p> <p>The sketch shows a central 'Emission Point' marked with an 'X'. Below it is the 'Observers Position'. A dashed line labeled 'Sun Location Line' is drawn at a 140-degree angle from the observers' position. A north arrow is shown to the right. Wind direction is indicated by arrows pointing from the left towards the sun location line. Labels include 'Sun', 'Wind', 'Plume and Stack', and 'Observers Position'.</p>					17	0	15	30	45	47		
					18	0	15	30	45	48		
					19	0	15	30	45	49		
					20	0	15	30	45	50		
					21	0	15	30	45	51		
					22	0	15	30	45	52		
					23	0	15	30	45	53		
					24	0	15	30	45	54		
					25	0	15	30	45	55		
					26	0	15	30	45	56		
			AVERAGE OPACITY FOR HIGHEST PERIOD		27	0	15	30	45	57		
			NUMBER OF READINGS ABOVE 100% WERE 0		28	0	15	30	45	58		
			RANGE OF OPACITY READINGS		29	0	15	30	45	59		
			MINIMUM 0 MAXIMUM 0		30	0	15	30	45	60		
			OBSERVER'S NAME (PRINT) S. Andrews									
COMMENTS			OBSERVER'S SIGNATURE S. Andrews				DATE 9/5/17					
			ORGANIZATION AZR									
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE			CERTIFIED BY:				DATE					
TITLE			DATE				VERIFIED BY:		DATE			

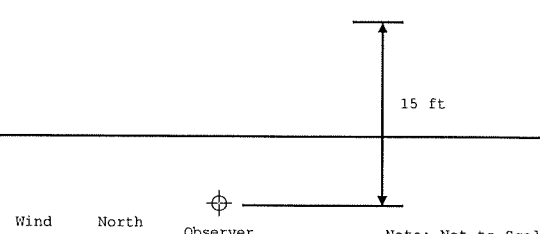
Visible Emissions Observations Form

SOURCE NAME American Zinc Recycling (Chicago Plant)			OBSERVATION DATE 9/5/17				START TIME		STOP TIME				
ADDRESS 2701 East 114th Street			SEC	0	15	30	45	MIN	SEC	0	15	30	45
CITY Chicago			STATE IL		ZIP 60617		1	0	15	30	45	31	
PHONE			SOURCE ID NUMBER 031600AFV		2	0	15	30	45	32			
PROCESS EQUIPMENT off-spec coke pile			OPERATING MODE unobs		3	0	15	30	45	33			
CONTROL EQUIPMENT covered			OPERATING MODE covered		4	0	15	30	45	34			
DESCRIBE EMISSION POINT START					5	0	15	30	45	35			
HEIGHT ABOVE GROUND LEVEL 12 ft		HEIGHT RELATIVE TO OBSERVER START 12 ft STOP 12 ft		6	0	15	30	45	36				
DISTANCE FROM OBSERVER START 50 STOP 50		DIRECTION FROM OBSERVER START SW STOP SW		7	0	15	30	45	37				
DESCRIBE EMISSIONS START None STOP none					8	0	15	30	45	38			
EMISSION COLOR START N/A STOP		PLUME TYPE: CONTINUOUS <input type="checkbox"/> FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>		9	0	15	30	45	39				
WATER DROPLETS PRESENT: <input checked="" type="checkbox"/> YES <input type="checkbox"/>		IF WATER DROPLET PLUME: ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>		10	0	15	30	45	40				
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START 3 ft STOP 3 ft					11	0	15	30	45	41			
DESCRIBE BACKGROUND START Trees STOP Trees					12	0	15	30	45	42			
BACKGROUND COLOR START green STOP green		SKY CONDITIONS START clear STOP cloudy		13	0	15	30	45	43				
WIND SPEED START 9 STOP 9		WIND DIRECTION START WNW STOP WNW		14	0	15	30	45	44				
AMBIENT TEMP START 70 STOP 70		WET BULB TEMP		RH.percent	15	0	15	30	45	45			
<p>Source Layout Sketch</p> <p>Draw North Arrow</p> <p>The sketch shows an 'X' for the Emission Point and a circle for the Observers Position. A dashed line represents the Sun Location Line, forming a 140-degree angle with the line connecting the emission point and observer. A legend indicates Sun (circle with dot), Wind (arrow), Plume and Stack (wavy line), and a North Arrow.</p>			16	0	15	30	45	46					
			17	0	15	30	45	47					
			18	0	15	30	45	48					
			19	0	15	30	45	49					
			20	0	15	30	45	50					
			21	0	15	30	45	51					
			22	0	15	30	45	52					
			23	0	15	30	45	53					
			24	0	15	30	45	54					
			25	0	15	30	45	55					
			26	0	15	30	45	56					
			AVERAGE OPACITY FOR HIGHEST PERIOD			NUMBER OF READINGS ABOVE HIGHEST PERIOD		27	0	15	30	45	57
RANGE OF OPACITY READINGS			MINIMUM		MAXIMUM		28	0	15	30	45	58	
OBSERVER'S NAME (PRINT)			OBSERVER'S SIGNATURE		DATE		29	0	15	30	45	59	
COMMENTS			OBSERVER'S SIGNATURE		DATE		30	0	15	30	45	60	
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE			ORGANIZATION		DATE								
TITLE			DATE		DATE								

Visible Emissions Observations Form

SOURCE NAME			OBSERVATION DATE				START TIME				STOP TIME			
American Zinc Recycling (Chicago Plant)			9/5/17											
ADDRESS			SEC					SEC						
2701 East 114th Street			MIN	0	15	30	45	MIN	0	15	30	45		
CITY			1	0	0	0	0	31						
Chicago			2	0	0	0	0	32						
STATE			3	0	0	0	0	33						
IL			4	0	0	0	0	34						
ZIP			5	0	0	0	0	35						
60617			6	0	0	0	0	36						
PHONE			7	0	0	0	0	37						
SOURCE ID NUMBER			8	0	0	0	0	38						
031600AFV			9	0	0	0	0	39						
PROCESS EQUIPMENT			10	0	0	0	0	40						
Coke loading Hopper			11	0	0	0	0	41						
OPERATING MODE			12	0	0	0	0	42						
Loading			13	0	0	0	0	43						
CONTROL EQUIPMENT			14	0	0	0	0	44						
H ₂ O truck/spray (as needed)			15	0	0	0	0	45						
OPERATING MODE			16	0	0	0	0	46						
DESCRIBE EMISSION POINT			17	0	0	0	0	47						
START			18	0	0	0	0	48						
Front end loader			19	0	0	0	0	49						
HEIGHT ABOVE GROUND LEVEL			20	0	0	0	0	50						
12 ft			21	0	0	0	0	51						
HEIGHT RELATIVE TO OBSERVER			22	0	0	0	0	52						
START 12 ft STOP 12 ft			23	0	0	0	0	53						
DISTANCE FROM OBSERVER			24	0	0	0	0	54						
START 50 ft STOP 50 ft			25	0	0	0	0	55						
DIRECTION FROM OBSERVER			26	0	0	0	0	56						
START NW STOP NW			27	0	0	0	0	57						
DESCRIBE EMISSIONS			28	0	0	0	0	58						
START none STOP none			29	0	0	0	0	59						
EMISSION COLOR			30	0	0	0	0	60						
START NA STOP NA			AVERAGE OPACITY FOR HIGHEST PERIOD		0		NUMBER OF READINGS ABOVE 100 % WERE		0					
PLUME TYPE: CONTINUOUS <input type="checkbox"/>			RANGE OF OPACITY READINGS		0		MINIMUM		MAXIMUM		0			
FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>			OBSERVER'S NAME (PRINT)		S. Andrews		OBSERVER'S SIGNATURE		DATE		9/5/17			
WATER DROPLETS PRESENT: NO <input type="checkbox"/> YES <input type="checkbox"/>			OBSERVER'S SIGNATURE		S. Andrews		DATE		9/5/17					
IF WATER DROPLET PLUME: ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>			ORGANIZATION				CERTIFIED BY:		DATE					
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED			I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE				VERIFIED BY:		DATE					
START 3 ft ABOVE STOP 3 ft ABOVE			TITLE				DATE							
DESCRIBE BACKGROUND			DATE											
START C&B Building STOP C&B														
BACKGROUND COLOR														
START Tan STOP Tan														
SKY CONDITIONS														
START Clear														
WIND SPEED														
START 9 STOP 9														
WIND DIRECTION														
START WNW														
AMBIENT TEMP														
START 70 STOP 70														
WET BULB TEMP														
RH.percent														
Source Layout Sketch														
Draw North Arrow														
<p>X Emission Point</p> <p>Observers Position</p> <p>Sun Location Line</p> <p>140°</p> <p>Sun Wind Plume and Stack</p>														

Method 9 Visual Emissions Observation Record Form
Paved and Unpaved Roadways

Company: AZR- Chicago	Provide sketch of observer's position relative to the source: 
Address: 2701 E. 114th St	
Facility ID:	
Date: 9/5/17	
Location Description: main truck road	
Control Device: Water truck	
Hours of Observation: 1 hr	
Observer's Name: Shannon Andrews	
Certification Date of Observer:	Observer's Affiliation: AZR
Point of Emissions: Roadway/Tire Interface	Height of Discharge Point: 0 ft

CLOCK TIME	Initial	Final
OBSERVER LOCATION		
Distance to discharge	15 ft	15 ft
Direction from discharge	90 degrees	90 degrees
Height of observation point	4 ft	4 ft
BACKGROUND DESCRIPTION	Trees / Sky	Trees / Sky
WEATHER CONDITIONS		
Wind Direction	From the	From the
Wind Speed	mph	mph
Ambient Temperature	F	F
SKY CONDITIONS (e.g., clear, overcast, % clouds, etc.)	Cloudy	Cloudy
PLUME DESCRIPTION		
Color	None	None.
Distance Visible	7 1/2 miles	7 1/2 miles
OTHER INFORMATION		

SUMMARY OF AVERAGE OPACITY

Set Number	Time 1400	Opacity (%)	
	Start - End	Sum	Average
1	1400 - 1406	0	0
2	1406 - 1412	0	0
3	1412 - 1418	0	0
4	1418 - 1424	0	0

Readings ranged from 0 to 0 % opacity.

Average of 12 readings: 0

Method 9 Visual Emissions Observation Record Form
Paved and Unpaved Roadways (Cont.)

Page 2 of 2

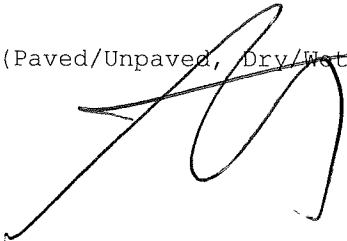
Company AZR Observer S. Andrews

Location CHICAGO IL Facility Type INDUSTRIAL

Point of emissions Roadway/Tire Interface

Vehicle Pass #	Seconds			Vehicle Type
	0	5	10	
1	0	0	0	TRUCK
2	0	0	0	PAY LOADER
3	0	0	0	TRUCK
4	0	0	0	TRUCK

Description of Road (Paved/Unpaved, Dry/Wet): _____



Observer Signature

9/5/17

Date

Method 9 Visual Emissions Observation Record Form
Paved and Unpaved Roadways

Company: <u>AER</u>	Provide sketch of observer's position relative to the source:
Address: <u>2701 E. 114th St</u>	
Facility ID:	
Date: <u>9/5/17</u>	
Location Description: <u>unpaved road - 114th St</u>	
Control Device: <u>H₂O trucks</u>	
Hours of Observation: <u>60 min</u>	
Observer's Name: <u>S. Andrews</u>	
Certification Date of Observer:	Observer's Affiliation:
Point of Emissions: <u>Roadway/Tire Interface</u>	Height of Discharge Point: <u>0 ft</u>

CLOCK TIME	Initial	Final
OBSERVER LOCATION		
Distance to discharge	15 ft	15 ft
Direction from discharge	90 degrees	90 degrees
Height of observation point	4 ft	4 ft
BACKGROUND DESCRIPTION	<u>plants/sky</u>	<u>plants/sky</u>
WEATHER CONDITIONS		
Wind Direction	<u>From the WNW</u>	<u>WNW</u> From the
Wind Speed	<u>9 mph</u>	<u>9 mph</u>
Ambient Temperature	<u>70 F</u>	<u>70 F</u>
SKY CONDITIONS (e.g., clear, overcast, % clouds, etc.)	<u>cloudy</u>	<u>cloudy</u>
PLUME DESCRIPTION		
Color	<u>NONE</u>	<u>NONE</u>
Distance Visible	<u>71 miles</u>	<u>71 miles</u>
OTHER INFORMATION		

SUMMARY OF AVERAGE OPACITY

Set Number	Time	Opacity (%)	
	Start - End	Sum	Average
1	<u>330 - 336</u>	<u>0</u>	<u>0</u>
2	<u>336 - 342</u>	<u>0</u>	<u>0</u>
3	<u>342 - 354</u>	<u>0</u>	<u>0</u>
4	<u>354 - 406</u>	<u>0</u>	<u>0</u>

Readings ranged from 0 to 0 % opacity.

Average of 12 readings: 0

Method 9 Visual Emissions Observation Record Form
 Paved and Unpaved Roadways (Cont.)

Company AZR Observer S. Andrews

Location Chicago, IL Facility Type INDUSTRIAL

Point of emissions Roadway/Tire Interface

Vehicle Pass #	Seconds			Vehicle Type
	0	5	10	
1	0	0	0	TRUCK
2	0	0	0	TRUCK
3	0	0	0	CAR
4	0	0	0	SUV

Description of Road (Paved/Unpaved, Dry/Wet): moist


 Observer Signature

9/15/17
 Date

Method 9 Visual Emissions Observation Record Form
Paved and Unpaved Roadways

Company: <u>AZR</u>		Provide sketch of observer's position relative to the source:		
Address: <u>2701 E. 114th St</u>				
Facility ID:				
Date: <u>9/5/17</u>				
Location Description: <u>paved road to IRM loading</u>				
Control Device: <u>H₂O truck</u>				
Hours of Observation: <u>1</u>				
Observer's Name: <u>S. Andrews</u>		Observer's Affiliation:		
Certification Date of Observer:		Height of Discharge Point: <u>0 ft</u>		
Point of Emissions: <u>Roadway/Tire Interface</u>				
CLOCK TIME	Initial	Final		
OBSERVER LOCATION				
Distance to discharge	15 ft	15 ft		
Direction from discharge	90 degrees	90 degrees		
Height of observation point	4 ft	4 ft		
BACKGROUND DESCRIPTION	<u>Sky, trees</u>	<u>Sky, trees</u>		
WEATHER CONDITIONS				
Wind Direction	<u>From the W</u>	<u>From the W</u>		
Wind Speed	<u>mph 16</u>	<u>mph 16</u>		
Ambient Temperature	<u>F 70</u>	<u>F 70</u>		
SKY CONDITIONS (e.g., clear, overcast, % clouds, etc.)	<u>cloudy</u>	<u>cloudy</u>		
PLUME DESCRIPTION				
Color	<u>none</u>	<u>none</u>		
Distance Visible	<u>miles</u>	<u>miles</u>		
OTHER INFORMATION				
SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity (%)	
	Start	End	Sum	Average
1	1510	1516	0	0
2	1516	1522	0	0
3	1528	1534	0	0
4	1534	1540	0	0
Readings ranged from <u>0</u> to <u>0</u> % opacity.				
Average of 12 readings: <u>0</u>				

Method 9 Visual Emissions Observation Record Form
Paved and Unpaved Roadways (Cont.)

Page 2 of 2

Company AZR Observer S. Andrews

Location Chicago, IL Facility Type Industrial

Point of emissions Roadway/Tire Interface

Vehicle Pass #	Seconds			Vehicle Type
	0	5	10	
1	0	0	0	TRUCK
2	0	0	0	TRUCK
3	0	0	0	PAYLOADER
4	0	0	0	KONIC TRACT

Description of Road (Paved/Unpaved, Dry/Wet): MOIST

AA
Observer Signature

9/5/17
Date

Method 9 Visual Emissions Observation Record Form
Paved and Unpaved Roadways

Company: <u>AZER</u>	Provide sketch of observer's position relative to the source:			
Address: <u>2701 E. 114th St Chicago</u>				
Facility ID:				
Date: <u>9/5/17</u>				
Location Description: <u>PARKING LOT</u>				
Control Device: <u>H₂O TRUCK</u>				
Hours of Observation: <u>60 min</u>				
Observer's Name: <u>S. Andrews</u>				
Certification Date of Observer:				Observer's Affiliation:
Point of Emissions: <u>Roadway/Tire Interface</u>				Height of Discharge Point: <u>0 ft</u>
CLOCK TIME				Initial
OBSERVER LOCATION				
Distance to discharge	15 ft		15 ft	
Direction from discharge	90 degrees		90 degrees	
Height of observation point	4 ft		4 ft	
BACKGROUND DESCRIPTION	<u>Sky foliage</u>		<u>Sky, foliage</u>	
WEATHER CONDITIONS				
Wind Direction	From the		From the	
Wind Speed	mph		mph	
Ambient Temperature	F		F	
SKY CONDITIONS (e.g., clear, overcast, % clouds, etc.)	<u>cloudy, 70's</u>		<u>cloudy, 70's</u>	
PLUME DESCRIPTION				
Color	<u>NONE</u>		<u>NONE.</u>	
Distance Visible	<u>71 miles</u>		<u>71 miles</u>	
OTHER INFORMATION				
SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity (%)	
	Start - End		Sum	Average
1	<u>1440 - 1446</u>		<u>0</u>	<u>0</u>
2	<u>1446 - 1452</u>		<u>0</u>	<u>0</u>
3	<u>1452 - 1458</u>		<u>0</u>	<u>0</u>
4	<u>1458 - 1503</u>		<u>0</u>	<u>0</u>
Readings ranged from <u>0</u> to <u>0</u> % opacity.				
Average of 12 readings: <u>0</u>				

Method 9 Visual Emissions Observation Record Form
 Paved and Unpaved Roadways (Cont.)

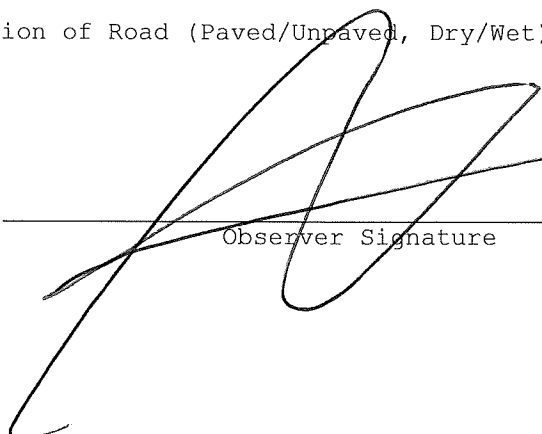
Company AZR Observer S. Andrews

Location PARKING LOT Facility Type INDUSTRIAL

Point of emissions Roadway/Tire Interface

Vehicle Pass #	Seconds			Vehicle Type
	0	5	10	
1	0	0	0	light truck
2	0	0	0	CAR
3	0	0	0	CAR
4	0	0	0	SUV

Description of Road (Paved/Unpaved, Dry/Wet): UNPAVED, RAMP

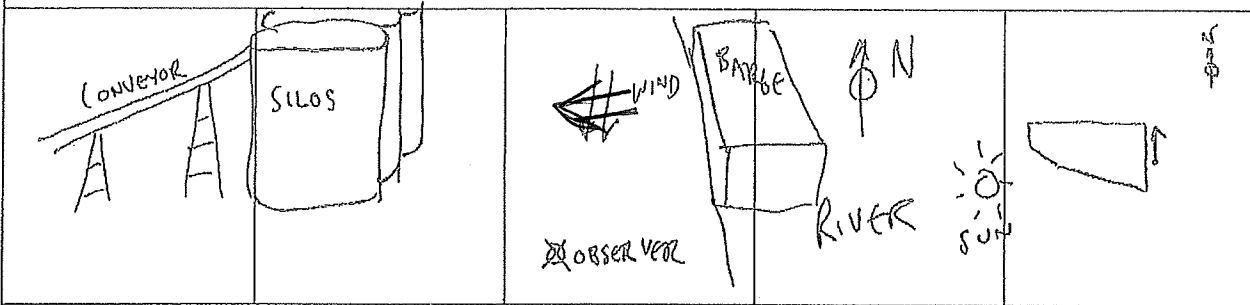
 Observer Signature

9/5/17 Date

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTSIDE LOCATION - METHOD 22**

Company Horsehead Corporation (Chicago Plant) Chicago Plant, 2701 E. 114th St, Chicago, IL Location 60617	Observer <i>S. Andrews</i> Affiliation <i>AZR</i>
Company Rep. <i>SHANNON ANDREWS</i>	Date <i>9/15/17</i>
Sky Conditions <i>Cloudy</i>	Wind Direction <i>West</i>
Precipitation <i>NONE</i>	Wind Speed <i>16 mph</i>
Industry Secondary Refining of Non Ferrous Metals	Process Unit <i>PROPERTY LINE (V8)</i>

Sketch Process Unit: Indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

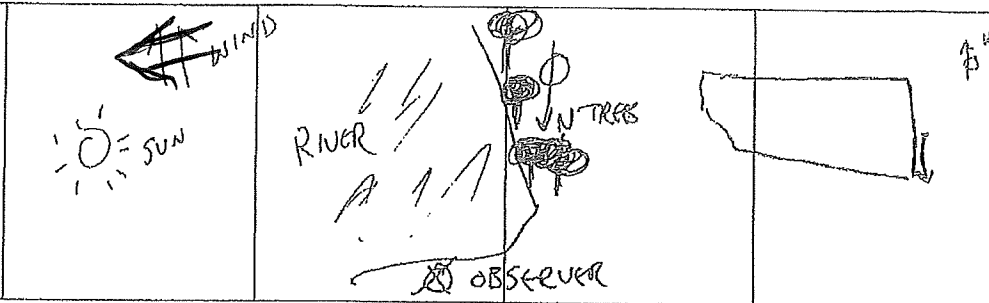
	Clock Time	Observation Period Duration (min:sec)	Actual Emission Time (min:sec)
Begin Observation	1120	2 min	0.0
	1122	↓	↓
	1124		
	1126		
	1128		
	1130		
End Observation			

Total Sample Time: 10 min
 Total Emission Time: 0
 Emission Frequency: 0
(Total Emission Time/Total Sample Time) x 100%

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTSIDE LOCATION - METHOD 22**

Company	Horsehead Corporation (Chicago Plant)	Observer	S. Andrews
Location	Chicago Plant, 2701 E. 114th St, Chicago, IL 60617	Affiliation	AZR
Company Rep.	SHANNON A. ANDREWS	Date	9/5/17
Sky Conditions	Cloudy	Wind Direction	West
Precipitation	None	Wind Speed	16 mph
Industry	Secondary Refining of Non Ferrous Metals	Process Unit	PROPERTY LINE (2/8)

Sketch Process Unit: Indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

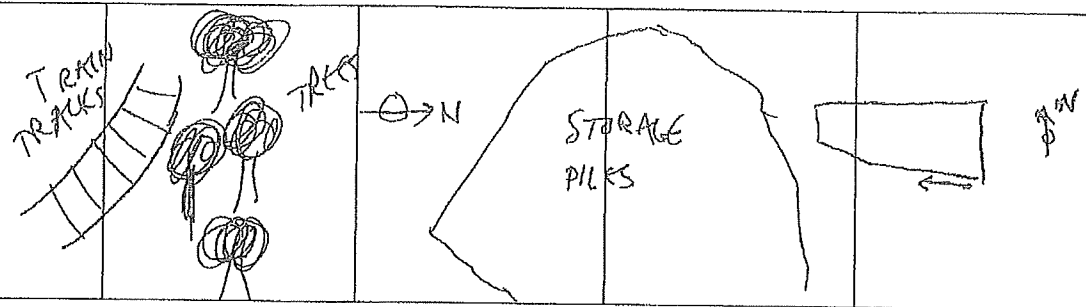
	Clock Time	Observation Period Duration (min:sec)	Actual Emission Time (min:sec)
Begin Observation	1100	2 min	0.0
	1102	↓	↓
	1104		
	1106		
	1108		
	1110		
End Observation			

Total Sample Time:	10 min
Total Emission Time:	0
Emission Frequency: (Total Emission Time/Total Sample Time) x 100%	0

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTSIDE LOCATION - METHOD 22**

Company	Horsehead Corporation (Chicago Plant) Chicago Plant, 2701 E. 114th St, Chicago, IL Location 60617	Observer	S. Andrews
Company Rep.	SHANNON ANDREWS	Affiliation	AZE
Sky Conditions	cloudy	Date	9/5/17
Precipitation	NONE	Wind Direction	West
Industry	Secondary Refining of Non Ferrous Metals	Wind Speed	16 mph.
		Process Unit	PROPERTY LINE (3/4)

Sketch Process Unit: Indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

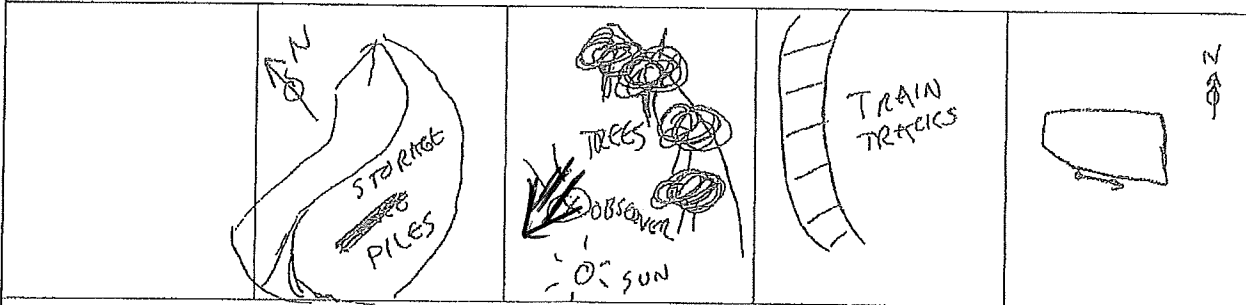
	Clock Time	Observation Period Duration (min:sec)	Actual Emission Time (min:sec)
Begin Observation	10:30	2 min	0
	1032	↓	↓
	1034		
	1036		
	1038		
	1040		
End Observation			

Total Sample Time: 10 min
 Total Emission Time: 0
 Emission Frequency: 0
 (Total Emission Time/Total Sample Time) x 100%

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTSIDE LOCATION - METHOD 22**

Company Horsehead Corporation ^{AZR} (Chicago Plant)	Observer <u>S. Andrews</u>
Location Chicago Plant, 2701 E. 114th St, Chicago, IL 60617	Affiliation <u>AZR</u>
Company Rep. <u>SHANNON ANDREWS</u>	Date <u>9/5/17</u>
Sky Conditions <u>Cloudy</u>	Wind Direction <u>West</u>
Precipitation <u>NONE</u>	Wind Speed <u>16 mph</u>
Industry <u>Secondary Refining of Non Ferrous Metals</u>	Process Unit <u>PROPERTY LINE (R/R)</u>

Sketch Process Unit: Indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

	Clock Time	Observation Period Duration (min:sec)	Actual Emission Time (min:sec)
Begin Observation	1010	2 min ↓	0.0 ↓
	1012		
	1014		
	1016		
	1018		
	1020		
End Observation			

Total Sample Time: 10 min
 Total Emission Time: 0
 Emission Frequency: 0
 (Total Emission Time/Total Sample Time) x 100%

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTSIDE LOCATION - METHOD 22**

Company Horsehead Corporation (Chicago Plant)
Chicago Plant, 2701 E. 114th St, Chicago, IL
Location 60617

Observer S. Andrews

Affiliation AZR

Company Rep. SHANNON ANDREWS

Date 9/15/17

Sky Conditions Cloudy
None

Wind Direction WEST

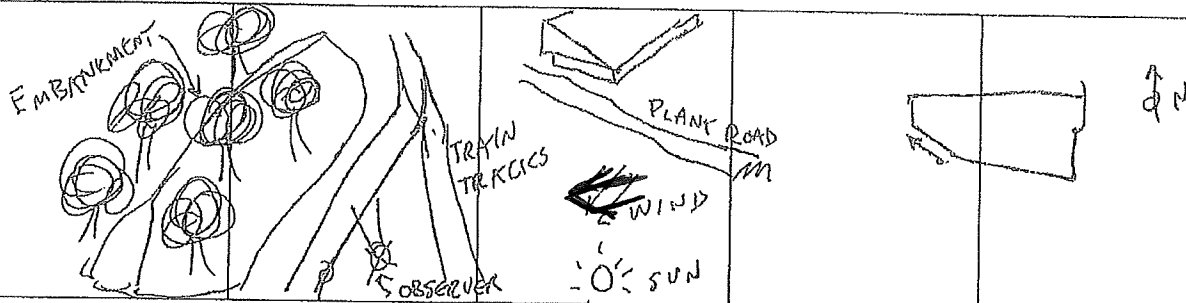
Precipitation _____

Wind Speed 16 mph

Industry Secondary Refining of Non Ferrous Metals

Process Unit PROPERTY LINE (5/8)

Sketch Process Unit: Indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

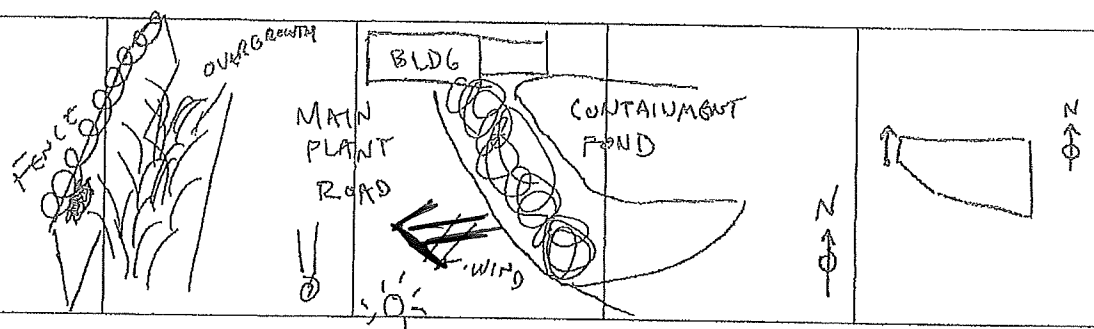
	Clock Time	Observation Period Duration (min:sec)	Actual Emission Time (min:sec)
Begin Observation	9:30	2 min	0
	9:32	↓	↓
	9:34		
	9:36		
	9:38		
	9:40		
End Observation			

Total Sample Time: 10 min
 Total Emission Time: 0
 Emission Frequency: 0
 (Total Emission Time/Total Sample Time) x 100%

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTSIDE LOCATION - METHOD 22**

Company	Horsehead Corporation (Chicago Plant) Chicago Plant, 2701 E. 114th St, Chicago, IL Location 60617	Observer	S. Andrews
Company Rep.	SHANNON ANDREWS	Affiliation	AZR
Sky Conditions	Cloudy	Date	9/5/17
Precipitation	NONE	Wind Direction	West
Industry	Secondary Refining of Non Ferrous Metals	Wind Speed	16 mph
		Process Unit	PROPERTY LINE (6/8)

Sketch Process Unit: Indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

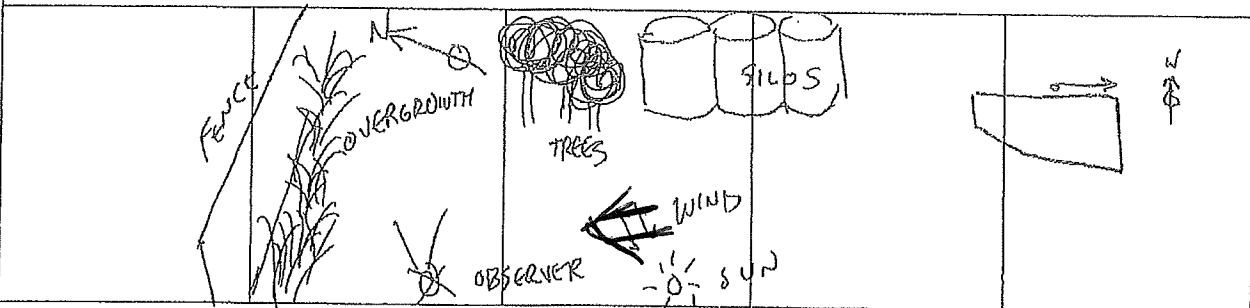
	Clock Time	Observation Period Duration (min:sec)	Actual Emission Time (min:sec)
Begin Observation	9:10a	2 min	00
	9:12	↓	↓
	9:14		
	9:16		
	9:18		
	9:20		
End Observation	10 min		

Total Sample Time: 10 min
 Total Emission Time: 0
 Emission Frequency: 0%
(Total Emission Time/Total Sample Time) x 100%

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTSIDE LOCATION - METHOD 22**

Company Horsehead Corporation (Chicago Plant) Chicago Plant, 2701 E. 114th St, Chicago, IL	Observer <u>S. ANDREWS</u>
Location 60617	Affiliation <u>AZR</u>
Company Rep. <u>S. Andrews</u>	Date <u>9/5/17</u>
Sky Conditions <u>Cloudy</u>	Wind Direction <u>West</u>
Precipitation <u>NONE</u>	Wind Speed <u>16 mph</u>
Industry <u>Secondary Refining of Non Ferrous Metals</u>	Process Unit <u>Property line (8/8)</u>

Sketch Process Unit: Indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

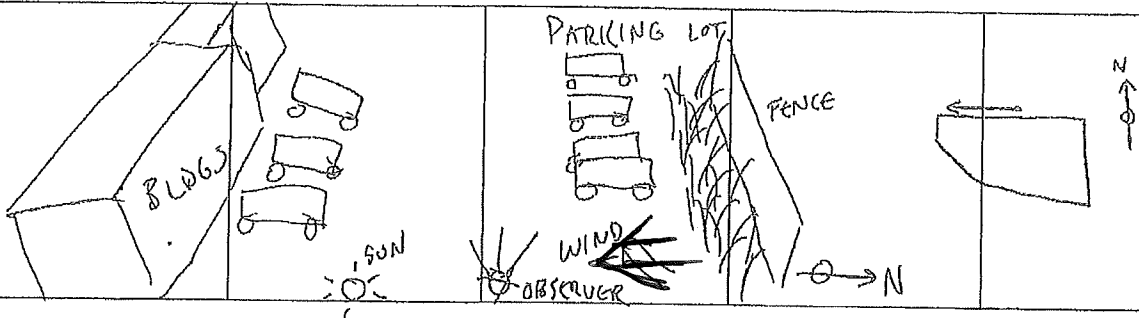
	Clock Time	Observation Period Duration (min:sec)	Actual Emission Time (min:sec)
Begin Observation	8:30 am	2 min ↓	00:00 ↓
	8:32 am		
	8:34		
	8:36		
	8:38		
End Observation			

Total Sample Time: 5 min
 Total Emission Time: 0
 Emission Frequency: 0%
(Total Emission Time/Total Sample Time) x 100%

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTSIDE LOCATION - METHOD 22**

Company Horsehead Corporation (Chicago Plant) Chicago Plant, 2701 E. 114th St, Chicago, IL Location 60617	Observer <u>S. Andrews</u>
Company Rep. <u>SHANNON ANDREWS</u>	Affiliation <u>AZR</u>
Sky Conditions <u>cloudy</u>	Date <u>9/5/17</u>
Precipitation <u>NONE</u>	Wind Direction <u>West</u>
Industry Secondary Refining of Non Ferrous Metals	Wind Speed <u>16 mph</u>
	Process Unit <u>PROPERTY LINE (7/8)</u>

Sketch Process Unit: Indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

	Clock Time	Observation Period Duration (min:sec)	Actual Emission Time (min:sec)
Begin Observation	8:50	2 min	0
	8:52	↓	↓
	8:54		
	8:56		
	8:58		
End Observation	10 min		

Total Sample Time: 8
 Total Emission Time: 0
 Emission Frequency: 0
 (Total Emission Time/Total Sample Time) x 100%

American Zinc Recycling – MTL-XXXX
Quarterly Visible Emissions and Opacity Summary

DATE: 11/15/17

BAGHOUSE ID#: Quarterly opacity

TIME: ALL DAY

INSPECTED BY: S. Andrews

Instructions: This checklist is to be used by site personnel as a guide to perform visible emissions and opacity observations. Walk-around inspections should not be limited to only items included on this form. Any corrective actions required are to be reported on this form. Comments / concerns on this form should be kept brief and concise.

Quarterly Visible Emissions and Opacity Summary

Location	Type of Fugitive Emissions Source	Duration of Observation (Minutes)	Average Opacity (%)
✓ Coke Hopper ✓	fugitive	7 min	0
✓ Off Spec Coke Pile ✓	fugitive	7 min	0
Temp. IRM Storage Pile (East of Coke Pile)	N/A		
Temporary IRM Storage Pile	fugitive	14 min	0
✓ Main IRM Storage Pile ✗	fugitive	7 min	0
✓ Coke Loading Pile ✗	fugitive	14 min	0
West Coke Pile -	N/A		
East Coke Pile -	N/A		
✓ Main IRM Storage Bunkers ✗	fugitive	14 min	0

Location	Type of Fugitive Emissions Source	Duration of Observation (Minutes)	Average Opacity (%)
IRM Truck Loading ✓	N/A		
✓ Paved Road - Main Truck Road ✓	Vehicle Traffic	30 min	0
✓ Parking Lot ✓	Vehicle Traffic	30 min	0
✓ Paved Road - To IRM Truck Loading ✓	Vehicle Traffic	45 min	0
✓ Unpaved Road - Section of 114 th Street ✓	Vehicle Traffic	45 min	0
✓ Property Line Locations (Method 22) ✗	Fugitive	60 min	0
✓ IRM Barge Loading Hopper and Loading Conveyor/Chute ✗	Material Transfer	60 min	0
✓ IRM Barge Loading Hopper ✗	Material Transfer	60 min	0
✓ IRM Barge Loading Conveyor/Chute ✗	Material Transfer	60 min	0

CORRECTIVE ACTIONS TAKEN	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
DID YOU GENERATE A WORK ORDER	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

DOCUMENT REPAIRS MADE BELOW.

PLEASE ADD ANY ADDITIONAL NOTES BELOW

weather 50° wind @ 12 mph ; west

Visible Emissions Observations Form

SOURCE NAME American Zinc Recycling (Chicago Plant)			OBSERVATION DATE 11/15/17				START TIME		STOP TIME			
ADDRESS 2701 East 114th Street			SEC	0	15	30	45	MIN	0	15	30	45
CITY Chicago			STATE IL	ZIP 60617		1	0	31				
PHONE			SOURCE ID NUMBER 031600AFV		2	0	32					
PROCESS EQUIPMENT Temporary Jam pile			OPERATING MODE UNO		3	0	33					
CONTROL EQUIPMENT H ₂ O TRUCK			OPERATING MODE UNO		4	0	34					
DESCRIBE EMISSION POINT START Temp Jam Storage pile			HEIGHT ABOVE GROUND LEVEL 7 ft		5	0	35					
HEIGHT ABOVE GROUND LEVEL 7 ft			HEIGHT RELATIVE TO OBSERVER START 7 STOP 7		6	0	36					
DISTANCE FROM OBSERVER START 25 STOP 25			DIRECTION FROM OBSERVER START NW STOP NW		7	0	37					
DESCRIBE EMISSIONS START none STOP none			EMISSION COLOR START none		8	0	38					
EMISSION COLOR START none			PLUME TYPE: CONTINUOUS <input type="checkbox"/> FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>		9	0	39					
WATER DROPLETS PRESENT: NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>			IF WATER DROPLET PLUME: ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>		10	0	40					
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START 3 ft STOP 3 ft			DESCRIBE BACKGROUND START coke build STOP coke build		11	0	41					
BACKGROUND COLOR START none			SKY CONDITIONS START overcast		12	0	42					
WIND SPEED START 12 STOP 12			WIND DIRECTION START west STOP west		13	0	43					
AMBIENT TEMP START 50 STOP 50			WET BULB TEMP		14	0	44					
RH.percent					15		45					
Source Layout Sketch			Draw North Arrow		16		46					
<p>The sketch shows an 'X' for the Emission Point and a circle for the Observers Position. A dashed line represents the Sun Location Line, forming a 140-degree angle with the line connecting the emission point and observer. A north arrow is shown, and wind direction is indicated by arrows pointing right.</p>					17		47					
					18		48					
					19		49					
					20		50					
					21		51					
					22		52					
					23		53					
					24		54					
					25		55					
					26		56					
					27		57					
					28		58					
					29		59					
					30		60					
					AVERAGE OPACITY FOR HIGHEST PERIOD			NUMBER OF READINGS ABOVE 100% WERE 0				
					RANGE OF OPACITY READINGS MINIMUM 0 MAXIMUM 0							
					OBSERVER'S NAME (PRINT) S. Andrews							
COMMENTS			OBSERVER'S SIGNATURE				DATE 11/15/17					
			ORGANIZATION									
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE			CERTIFIED BY:				DATE					
TITLE			DATE				VERIFIED BY:					
							DATE					

Visible Emissions Observations Form

SOURCE NAME American Zinc Recycling (Chicago Plant)			OBSERVATION DATE 11/15/17				START TIME		STOP TIME					
ADDRESS 2701 East 114th Street			SEC	0	15	30	45	SEC	0	15	30	45		
			MIN	0	15	30	45	MIN	0	15	30	45		
CITY Chicago			STATE IL		ZIP 60617		1		0	0	0	0		
PHONE			SOURCE ID NUMBER 031600AFV				2		0	0	0	0		
PROCESS EQUIPMENT Coke Hopper			OPERATING MODE loading				3		0	0	0	0		
CONTROL EQUIPMENT H ₂ O Trucks / H ₂ O spray			OPERATING MODE as needed				4		0	0	0	0		
DESCRIBE EMISSION POINT front end loader							5		0	0	0	0		
HEIGHT ABOVE GROUND LEVEL 12 ft			HEIGHT RELATIVE TO OBSERVER START 12 STOP 12				6		0	0	0	0		
DISTANCE FROM OBSERVER START 30ft STOP 30ft			DIRECTION FROM OBSERVER START NW STOP NW				7		0	0	0	0		
DESCRIBE EMISSIONS START NONE STOP NONE							8							
EMISSION COLOR START N/A STOP			PLUME TYPE: CONTINUOUS <input type="checkbox"/>				9							
WATER DROPLETS PRESENT: NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>			FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>				10							
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START 3ft STOP 3ft			IF WATER DROPLET PLUME: ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>				11							
DESCRIBE BACKGROUND START CA B Building STOP							12							
BACKGROUND COLOR START tan STOP			SKY CONDITIONS START STOP				13							
WIND SPEED START 12 STOP 12			WIND DIRECTION START south STOP				14							
AMBIENT TEMP START 50 STOP 50			WET BULB TEMP		RH.percent		15							
<p>Source Layout Sketch</p> <p>Draw North Arrow</p> <p>The sketch shows an 'Emission Point' marked with an 'X' at the top. Below it is the 'Observers Position'. A dashed line labeled 'Sun Location Line' is drawn at a 140-degree angle from the observers position. To the left, a compass rose indicates 'Sun' (circle with dot), 'Wind' (arrow pointing right), and 'Plume and Stack' (two lines pointing left).</p>							16							
			AVERAGE OPACITY FOR HIGHEST PERIOD		0		NUMBER OF READINGS ABOVE 100% WERE		0					
			RANGE OF OPACITY READINGS		0		MINIMUM		MAXIMUM		0			
			OBSERVER'S NAME (PRINT)			S. Andrews								
			OBSERVER'S SIGNATURE			[Signature]			DATE		11/15/17			
			ORGANIZATION			ARR								
			I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE			CERTIFIED BY:			DATE					
			TITLE			DATE			VERIFIED BY:		DATE			

Visible Emissions Observations Form

SOURCE NAME American Zinc Recycling (Chicago Plant)			OBSERVATION DATE 11/15/17				START TIME		STOP TIME				
ADDRESS 2701 East 114th Street			SEC	0	15	30	45	SEC	0	15	30	45	
			MIN					MIN					
			1	0	0	0	0	31					
CITY Chicago STATE IL ZIP 60617			2	0	0	0	0	32					
PHONE SOURCE ID NUMBER 031600AFV			3	0	0	0	0	33					
PROCESS EQUIPMENT Coke loading pile. OPERATING MODE loading			4	0	0	0	0	34					
CONTROL EQUIPMENT H ₂ O Truck/Spray OPERATING MODE As needed			5	0	0	0	0	35					
DESCRIBE EMISSION POINT START Coke loading pile.			6	0	0	0	0	36					
HEIGHT ABOVE GROUND LEVEL START 8 FT HEIGHT RELATIVE TO OBSERVER START 8 STOP 8			7	0	0	0	0	37					
DISTANCE FROM OBSERVER START 25' STOP 25' DIRECTION FROM OBSERVER START SW STOP SW			8	0	0	0	0	38					
DESCRIBE EMISSIONS START NONE STOP NONE			9	0	0	0	0	39					
EMISSION COLOR START N/A STOP PLUME TYPE: CONTINUOUS <input type="checkbox"/> FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>			10	0	0	0	0	40					
WATER DROPLETS PRESENT: NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> IF WATER DROPLET PLUME: ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>			11	0	0	0	0	41					
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START 3 FT STOP 3 FT			12	0	0	0	0	42					
DESCRIBE BACKGROUND START Sky STOP Sky			13	0	0	0	0	43					
BACKGROUND COLOR START Blue/gray STOP Blue/gray			14	0	0	0	0	44					
WIND SPEED START 12 STOP 12 WIND DIRECTION START South STOP			15					45					
AMBIENT TEMP START 50 STOP 50 WET BULB TEMP RH.percent			16					46					
<p>Source Layout Sketch</p> <p>Draw North Arrow</p>			17					47					
			18					48					
			19					49					
			20					50					
			21					51					
			22					52					
			23					53					
			24					54					
			25					55					
			26					56					
			27					57					
			28					58					
			29					59					
			30					60					
			AVERAGE OPACITY FOR HIGHEST PERIOD 0				NUMBER OF READINGS ABOVE 100% WERE 0						
			RANGE OF OPACITY READINGS MINIMUM 0 MAXIMUM 0										
			OBSERVER'S NAME (PRINT) S. Andrews										
COMMENTS			OBSERVER'S SIGNATURE				DATE 11/15/17						
			ORGANIZATION ABR										
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE			CERTIFIED BY:				DATE						
TITLE			DATE				VERIFIED BY:						
							DATE						

Visible Emissions Observations Form

SOURCE NAME American Zinc Recycling (Chicago Plant)			OBSERVATION DATE 11/15/17				START TIME		STOP TIME			
ADDRESS 2701 East 114th Street			SEC	0	15	30	45	MIN	0	15	30	45
CITY Chicago			STATE IL		ZIP 60617		1	0	0	0	0	31
PHONE			SOURCE ID NUMBER 031600AFV		2	0	0	0	0	0	0	32
PROCESS EQUIPMENT MAIN TRM pile			OPERATING MODE UND		3	0	0	0	0	0	0	33
CONTROL EQUIPMENT H ₂ O TRUCK			OPERATING MODE Watered.		4	0	0	0	0	0	0	34
DESCRIBE EMISSION POINT START MAIN TRM AIR			HEIGHT ABOVE GROUND LEVEL 18 FT		HEIGHT RELATIVE TO OBSERVER START 18 STOP 18		5	0	0	0	0	35
DISTANCE FROM OBSERVER START 45 STOP 45			DIRECTION FROM OBSERVER START SW STOP SW		6	0	0	0	0	0	0	36
DESCRIBE EMISSIONS START NONE STOP NONE			EMISSION COLOR START N/A STOP		PLUME TYPE: CONTINUOUS <input type="checkbox"/>		7	0	0	0	0	37
WATER DROPLETS PRESENT: NO <input type="checkbox"/> YES <input type="checkbox"/>			IF WATER DROPLET PLUME: ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>		8							38
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START 3 FT STOP 3 FT			DESCRIBE BACKGROUND START Sky STOP Sky		9							39
WIND SPEED START 12 STOP 12			WIND DIRECTION START SW STOP SW		10							40
AMBIENT TEMP START 50 STOP 50			WET BULB TEMP		11							41
RH.percent			Sun Location Line		12							42
Source Layout Sketch Draw North Arrow			Sun Location Line		13							43
			Sun Location Line		14							44
<p>AVERAGE OPACITY FOR HIGHEST PERIOD 0</p> <p>RANGE OF OPACITY READINGS MINIMUM 0 MAXIMUM 0</p> <p>OBSERVER'S NAME (PRINT) S. Andrews</p> <p>OBSERVER'S SIGNATURE [Signature]</p>			<p>NUMBER OF READINGS ABOVE 100 % WERE 0</p>		15							45
COMMENTS			OBSERVER'S SIGNATURE		16							46
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE			ORGANIZATION AZR		17							47
TITLE			DATE		18							48
DATE			VERIFIED BY:		19							49
DATE			DATE		20							50
DATE			DATE		21							51
DATE			DATE		22							52
DATE			DATE		23							53
DATE			DATE		24							54
DATE			DATE		25							55
DATE			DATE		26							56
DATE			DATE		27							57
DATE			DATE		28							58
DATE			DATE		29							59
DATE			DATE		30							60

Visible Emissions Observations Form

SOURCE NAME American Zinc Recycling (Chicago Plant)			OBSERVATION DATE 11/15/17				START TIME		STOP TIME			
ADDRESS 2701 East 114th Street			SEC	0	15	30	45	SEC	0	15	30	45
			MIN					MIN				
			1	0	0	0	0	31				
CITY Chicago			2	0	0	0	0	32				
STATE IL			3	0	0	0	0	33				
ZIP 60617			4	0	0	0	0	34				
PHONE			5	0	0	0	0	35				
SOURCE ID NUMBER 031600AFV			6	0	0	0	0	36				
PROCESS EQUIPMENT off spec coke pile			7	0	0	0	0	37				
OPERATING MODE UMP			8					38				
CONTROL EQUIPMENT covered			9					39				
OPERATING MODE UMP			10					40				
DESCRIBE EMISSION POINT START coke pile			11					41				
HEIGHT ABOVE GROUND LEVEL 12			12					42				
HEIGHT RELATIVE TO OBSERVER START 12 STOP 12			13					43				
DISTANCE FROM OBSERVER START 45 STOP 45			14					44				
DIRECTION FROM OBSERVER START SW STOP SW			15					45				
DESCRIBE EMISSIONS START none STOP none			16					46				
EMISSION COLOR START N/A STOP			17					47				
PLUME TYPE: CONTINUOUS <input type="checkbox"/>			18					48				
FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>			19					49				
WATER DROPLETS PRESENT: NO <input type="checkbox"/> YES <input type="checkbox"/>			20					50				
IF WATER DROPLET PLUME: ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>			21					51				
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START 3 ft STOP 3 ft			22					52				
DESCRIBE BACKGROUND START trees STOP trees			23					53				
BACKGROUND COLOR START Green STOP			24					54				
SKY CONDITIONS START cloudy STOP			25					55				
WIND SPEED START 12 STOP 12			26					56				
WIND DIRECTION START SW STOP			27					57				
AMBIENT TEMP START 50 STOP 50			28					58				
WET BULB TEMP			29					59				
RH.percent			30					60				
Source Layout Sketch Draw North Arrow			AVERAGE OPACITY FOR HIGHEST PERIOD		0		NUMBER OF READINGS ABOVE 100 % WERE		0			
<p>The sketch shows an 'X' for the Emission Point and a circle for the Observers Position. A dashed line represents the Sun Location Line, forming a 140-degree angle with the line connecting the emission point and observer. Wind direction is indicated by arrows pointing right, and the plume is shown as a wedge pointing left.</p>			RANGE OF OPACITY READINGS		0 MINIMUM		MAXIMUM 0					
			OBSERVER'S NAME (PRINT) S. Andrews									
COMMENTS			OBSERVER'S SIGNATURE <i>[Signature]</i>						DATE 11/15/17			
			ORGANIZATION AZR									
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE			CERTIFIED BY:						DATE			
TITLE			VERIFIED BY:						DATE			

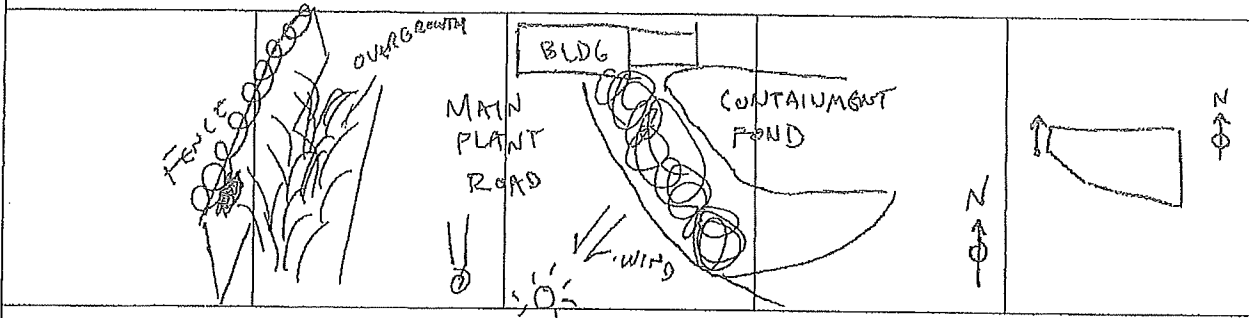
Visible Emissions Observations Form

SOURCE NAME American Zinc Recycling (Chicago Plant)			OBSERVATION DATE 11/15/17				START TIME				STOP TIME					
ADDRESS 2701 East 114th Street			SEC	0	15	30	45	SEC	0	15	30	45				
			MIN				MIN									
CITY Chicago			STATE IL		ZIP 60617		1	0	0	0	0	31				
PHONE			SOURCE ID NUMBER 031600AFV				2	0	0	0	0	32				
PROCESS EQUIPMENT IRM Bunkers			OPERATING MODE UND				3	0	0	0	0	33				
CONTROL EQUIPMENT H2O TRUCK			OPERATING MODE UND				4	0	0	0	0	34				
DESCRIBE EMISSION POINT START IRM Bunkers							5	0	0	0	0	35				
HEIGHT ABOVE GROUND LEVEL START 9 FT			HEIGHT RELATIVE TO OBSERVER START 9 STOP 9				6	0	0	0	0	36				
DISTANCE FROM OBSERVER START 35 STOP 35			DIRECTION FROM OBSERVER START NNW STOP NNW				7	0	0	0	0	37				
DESCRIBE EMISSIONS START NONE STOP NONE							8	0	0	0	0	38				
EMISSION COLOR START STOP			PLUME TYPE: CONTINUOUS <input type="checkbox"/> FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>				9	0	0	0	0	39				
WATER DROPLETS PRESENT: NO <input type="checkbox"/> YES <input type="checkbox"/>			IF WATER DROPLET PLUME: ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>				10	0	0	0	0	40				
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START 3 FT STOP 3 FT							11	0	0	0	0	41				
DESCRIBE BACKGROUND START CAB STOP CAB							12	0	0	0	0	42				
BACKGROUND COLOR START TN STOP TAN			SKY CONDITIONS START cloudy				13	0	0	0	0	43				
WIND SPEED START 12 STOP 12			WIND DIRECTION START SW				14	0	0	0	0	44				
AMBIENT TEMP START 50 STOP 50			WET BULB TEMP		RH.percent		15					45				
Source Layout Sketch Draw North Arrow			<p>The sketch shows an 'X' for the Emission Point and a circle for the Observers Position. A dashed line represents the Sun Location Line, forming a 140-degree angle with the line connecting the emission point and observer. A north arrow is shown, and wind direction is indicated by an arrow pointing right.</p>				16							46		
							17					47				
							18					48				
							19					49				
							20					50				
							21					51				
							22					52				
							23					53				
							24					54				
							25					55				
							26					56				
							27					57				
							28					58				
							29					59				
							30					60				
			AVERAGE OPACITY FOR HIGHEST PERIOD 0				NUMBER OF READINGS ABOVE 100% WERE 0									
			RANGE OF OPACITY READINGS 0 MINIMUM				MAXIMUM 0									
			OBSERVER'S NAME (PRINT) S. Andrews													
COMMENTS			OBSERVER'S SIGNATURE				DATE 11/15/17									
			ORGANIZATION AZR													
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE			CERTIFIED BY:				DATE									
TITLE			DATE				VERIFIED BY:				DATE					

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTSIDE LOCATION - METHOD 22**

Company Horsehead Corporation (Chicago Plant) Chicago Plant, 2701 E. 114th St, Chicago, IL Location 60617	Observer S Andrews Affiliation AZR
Company Rep. SHANNON ANDREWS	Date 11/15/17
Sky Conditions CLOUDY	Wind Direction West
Precipitation NONE	Wind Speed 12 MPH
Industry Secondary Refining of Non Ferrous Metals	Process Unit PROPERTY LINE (6/8)

Sketch Process Unit: Indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

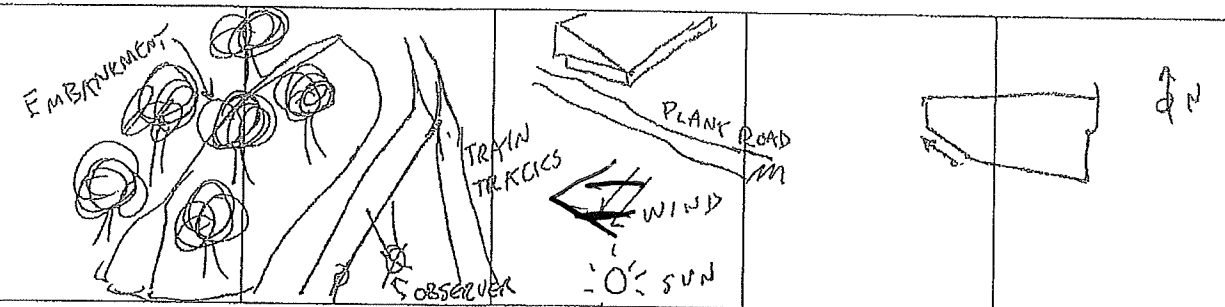
	Clock Time	Observation Period Duration (min:sec)	Actual Emission Time (min:sec)
Begin Observation	1455	2min	0 0
	1457	↓	↓
	1459		
	1500		
	1503		
End Observation	10min		

Total Sample Time:	10min
Total Emission Time:	0
Emission Frequency: (Total Emission Time/Total Sample Time) x 100%	0

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTSIDE LOCATION - METHOD 22**

Company	Horsehead Corporation (Chicago Plant) Chicago Plant, 2701 E. 114th St, Chicago, IL Location 60617	Observer	S. Andrews
Company Rep.	SHANNON ANDREWS	Affiliation	AZR
Sky Conditions	Cloudy	Date	11/15/17
Precipitation	Slight misting	Wind Direction	West
Industry	Secondary Refining of Non Ferrous Metals	Wind Speed	12 mph
		Process Unit	PROPERTY LINE (5/8)

Sketch Process Unit: Indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

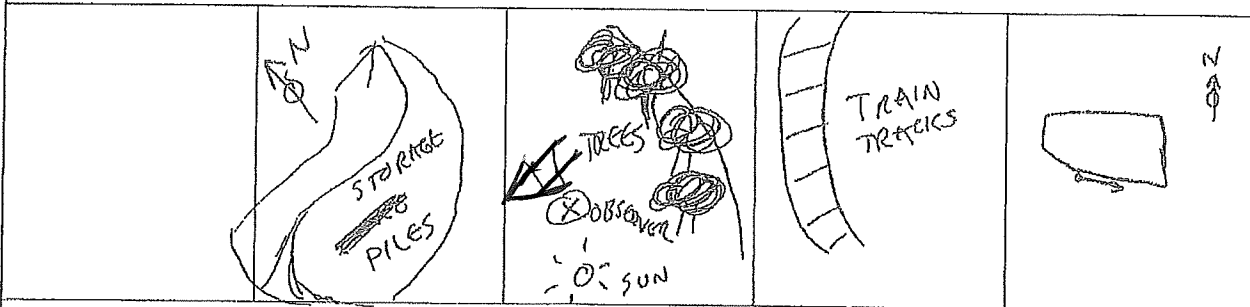
	Clock Time	Observation Period Duration (min:sec)	Actual Emission Time (min:sec)
Begin Observation	1440	2 min	0
	1442	↓	↓
	1444		
	1446		
	1448		
	1450		
End Observation			

Total Sample Time: 10 min
 Total Emission Time: 0
 Emission Frequency:
 (Total Emission Time/Total Sample Time) x 100% = 0

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTSIDE LOCATION - METHOD 22**

Company Horsehead Corporation (Chicago Plant) Chicago Plant, 2701 E. 114th St, Chicago, IL Location 60617	Observer <u>S. Andrews</u>
Company Rep. <u>SHANNON ANDREWS</u>	Affiliation <u>AZR</u>
Sky Conditions <u>Cloudy</u>	Date <u>11/15/17</u>
Precipitation <u>NONE</u>	Wind Direction <u>West</u>
Industry Secondary Refining of Non Ferrous Metals	Wind Speed <u>12 mph</u>
	Process Unit <u>PROPERTY LINE (R/R)</u>

Sketch Process Unit: Indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

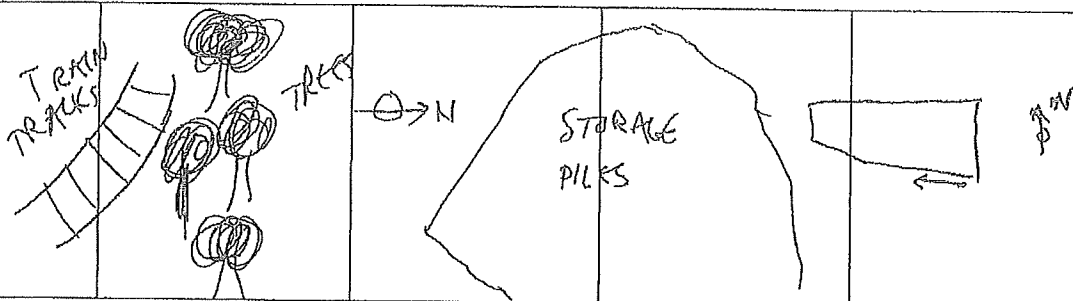
	Clock Time	Observation Period Duration (min:sec)	Actual Emission Time (min:sec)
Begin Observation	1420	2 min ↓ ✓	0 - ↓
	1422		
	1424		
	1426		
	1428		
	1430		
End Observation			

Total Sample Time: 10 min
 Total Emission Time: 0
 Emission Frequency: 0
 (Total Emission Time/Total Sample Time) x 100%

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTSIDE LOCATION - METHOD 22**

Company Horsehead Corporation (Chicago Plant) Chicago Plant, 2701 E. 114th St, Chicago, IL	Observer <i>S. Andrews</i>
Location 60617	Affiliation <i>AZR</i>
Company Rep. <i>SHANNON ANDREWS</i>	Date <i>11/15/17</i>
Sky Conditions <i>Cloudy</i>	Wind Direction <i>West</i>
Precipitation <i>NONE</i>	Wind Speed <i>12 mph</i>
Industry Secondary Refining of Non Ferrous Metals	Process Unit <i>PROPERTY LINE (3/4)</i>

Sketch Process Unit: Indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

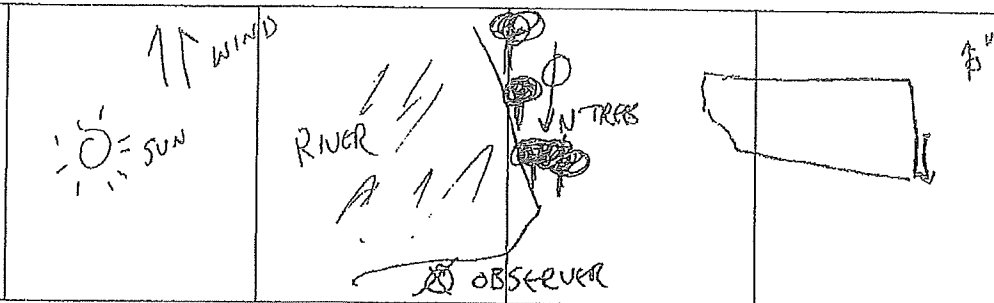
	Clock Time	Observation Period Duration (min:sec)	Actual Emission Time (min:sec)
Begin Observation	1400	10 2 min	0
	1402	↓	↓
	1404		
	1406		
	1408		
	1410		
End Observation		10 min	

Total Sample Time:	<i>10 min</i>
Total Emission Time:	<i>0</i>
Emission Frequency:	<i>0</i>
(Total Emission Time/Total Sample Time) x 100%	

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTSIDE LOCATION - METHOD 22**

Company	Horsehead Corporation (Chicago Plant) Chicago Plant, 2701 E. 114th St, Chicago, IL Location 60617	Observer	S. Andrews
Company Rep.	SHANNON ANDREWS	Affiliation	AZR
Sky Conditions	cloudy	Date	11/15/17
Precipitation	PRIZZE	Wind Direction	West
Industry	Secondary Refining of Non Ferrous Metals	Wind Speed	12 mph
		Process Unit	PROPERTY LINE (2/8)

Sketch Process Unit: Indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

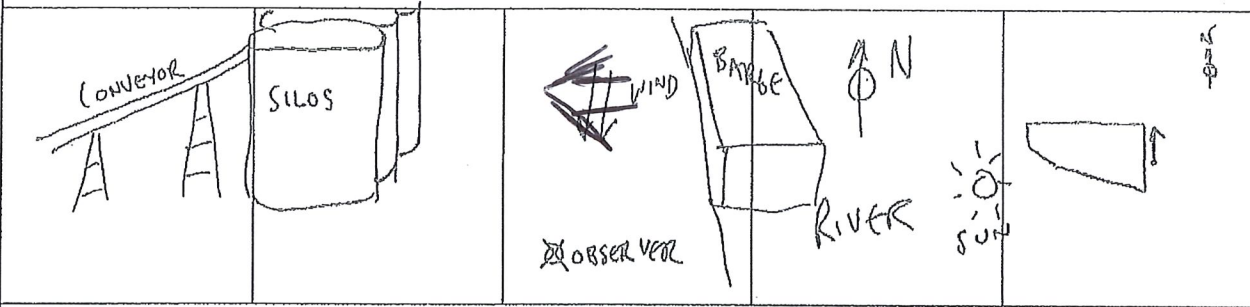
	Clock Time	Observation Period Duration (min:sec)	Actual Emission Time (min:sec)
Begin Observation	1340	↓	↓
	1342		
	1344		
	1346		
	1348		
	1350		
End Observation			

Total Sample Time:	10 min
Total Emission Time:	0
Emission Frequency: (Total Emission Time/Total Sample Time) x 100%	0

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTSIDE LOCATION - METHOD 22**

Company Horsehead Corporation (Chicago Plant) Chicago Plant, 2701 E. 114th St, Chicago, IL	Observer S. Andrews
Location 60617	Affiliation AZR
Company Rep. SHANNON ANDREWS	Date 11/15/17
Sky Conditions Cloudy	Wind Direction West
Precipitation PRIZZEK	Wind Speed 12 mph
Industry Secondary Refining of Non Ferrous Metals	Process Unit PROPERTY LINE (1/8)

Sketch Process Unit: Indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

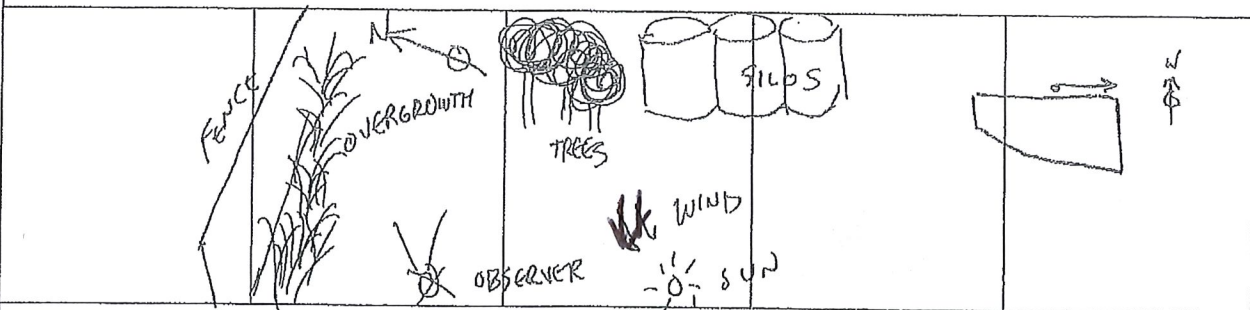
	Clock Time	Observation Period Duration (min:sec)	Actual Emission Time (min:sec)
Begin Observation	1320	2 min	0
	1322	↓	↓
	1324		
	1326		
	1328		
	1330		
End Observation	10 min		

Total Sample Time: 10 min
 Total Emission Time: 0
 Emission Frequency: 0
 (Total Emission Time/Total Sample Time) x 100%

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTSIDE LOCATION - METHOD 22**

Company Horsehead Corporation (Chicago Plant) Chicago Plant, 2701 E. 114th St, Chicago, IL	Observer <u>S. Andrews</u>
Location 60617	Affiliation <u>AZR</u>
Company Rep. <u>S. Andrews</u>	Date <u>11/15/17</u>
Sky Conditions <u>Cloudy</u>	Wind Direction <u>West</u>
Precipitation None <u>Slight</u>	Wind Speed <u>12 mph</u>
Industry Secondary Refining of Non Ferrous Metals	Process Unit <u>Property line (8/8)</u>

Sketch Process Unit: Indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

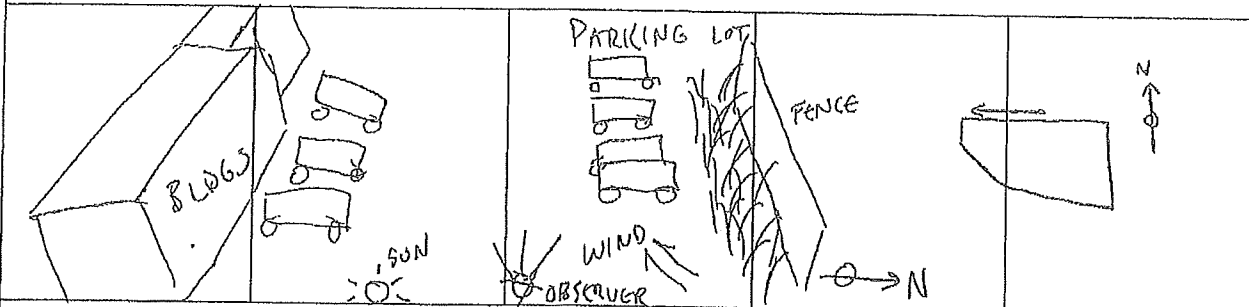
	Clock Time	Observation Period Duration (min:sec)	Actual Emission Time (min:sec)
Begin Observation	13:00	2 min	00:00
	13:02	↓	↓
	13:04		
	13:06		
	13:08		
	13:10		
End Observation	10 min		

Total Sample Time: 10 min
 Total Emission Time: 0
 Emission Frequency: 0%
(Total Emission Time/Total Sample Time) x 100%

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTSIDE LOCATION - METHOD 22**

Company Horsehead Corporation (Chicago Plant) Chicago Plant, 2701 E. 114th St, Chicago, IL Location 60617	Observer <u>Si Andrews</u>
Company Rep. <u>SHANNON ANDREWS</u>	Affiliation <u>AZR</u>
Sky Conditions <u>Cloudy</u>	Date <u>11/15/17</u>
Precipitation <u>misty</u>	Wind Direction <u>West</u>
Industry Secondary Refining of Non Ferrous Metals	Wind Speed <u>12 mph</u>
	Process Unit <u>PROPERTY LINE (7/8)</u>

Sketch Process Unit: Indicate observer position relative to source; indicate potential emission points and/or actual emission points.

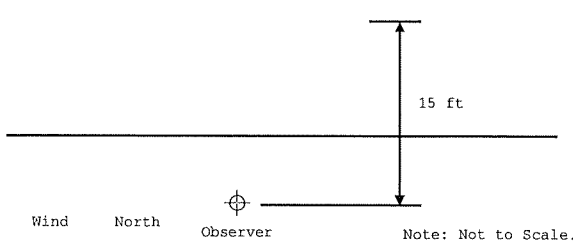


OBSERVATIONS

	Clock Time	Observation Period Duration (min:sec)	Actual Emission Time (min:sec)
Begin Observation	15:10	2 min	0
	15:12	↓	↓
	15:14		
	15:16		
	15:18		
	15:20		
End Observation			

Total Sample Time: 10 min
 Total Emission Time: 0
 Emission Frequency: 0
 (Total Emission Time/Total Sample Time) x 100%

Method 9 Visual Emissions Observation Record Form
Paved and Unpaved Roadways

Company: <u>AZR</u>		Provide sketch of observer's position relative to the source:		
Address: <u>2901 E. 114th St Chicago</u>				
Facility ID:				
Date: <u>11/15/17</u>				
Location Description: <u>unpaved 114th St</u>				
Control Device: <u>H₂O truck</u>				
Hours of Observation: <u>60 min</u>				
Observer's Name: <u>S. Andrews</u>				
Certification Date of Observer:		Observer's Affiliation:		
Point of Emissions: <u>Roadway/Tire Interface</u>		Height of Discharge Point: <u>0 ft</u>		
CLOCK TIME	Initial	Final		
OBSERVER LOCATION				
Distance to discharge	15 ft	15 ft		
Direction from discharge	90 degrees	90 degrees		
Height of observation point	4 ft	4 ft		
BACKGROUND DESCRIPTION	<u>plants/sky</u>	<u>plants/sky</u>		
WEATHER CONDITIONS				
Wind Direction	<u>From the S</u>	<u>From the S</u>		
Wind Speed	<u>12 mph</u>	<u>12 mph</u>		
Ambient Temperature	<u>50 F</u>	<u>50 F</u>		
SKY CONDITIONS (e.g., clear, overcast, % clouds, etc.)	<u>cloudy / drizzle</u>	<u>cloudy / drizzle.</u>		
PLUME DESCRIPTION				
Color	<u>None</u>	<u>None</u>		
Distance Visible	<u>71 miles</u>	<u>71 miles</u>		
OTHER INFORMATION				
SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity (%)	
	Start - End		Sum	Average
1	<u>900 - 906</u>		<u>0</u>	<u>0</u>
2	<u>906 - 912</u>		<u>0</u>	<u>0</u>
3	<u>912 - 918</u>		<u>0</u>	<u>0</u>
4	<u>918 - 925</u>		<u>0</u>	<u>0</u>
Readings ranged from <u>0</u> to <u>0</u> % opacity.				
Average of 12 readings: <u>0</u>				

Method 9 Visual Emissions Observation Record Form
 Paved and Unpaved Roadways (Cont.)

Page 2 of 2

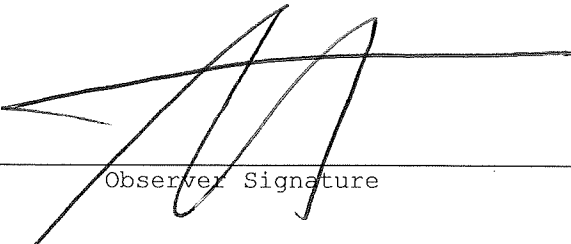
Company AER Observer S. Andrews

Location Chicago, IL Facility Type Industrial

Point of emissions Roadway/Tire Interface

Vehicle Pass #	Seconds			Vehicle Type
	0	5	10	
1	0	0	0	Truck
2	0	0	0	Truck
3	0	0	0	CAR
4	0	0	0	CAR

Description of Road (Paved/Unpaved, Dry/Wet): wet, moist

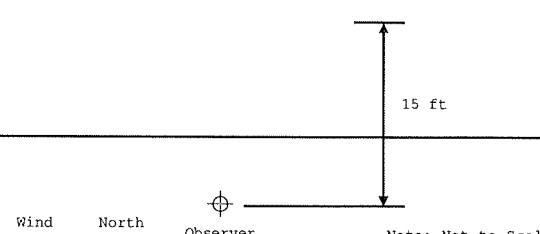


 Observer Signature

11/15/17

 Date

Method 9 Visual Emissions Observation Record Form
Paved and Unpaved Roadways

Company: <u>AZR</u>	Provide sketch of observer's position relative to the source: 
Address: <u>2701 E. 114th St Chicago</u>	
Facility ID:	
Date: <u>11/15/17</u>	
Location Description: <u>PARKING LOT</u>	
Control Device: <u>H₂O TRUCKS (AS NEEDED)</u>	
Hours of Observation: <u>1 hr.</u>	
Observer's Name: <u>S. Andrews</u>	Observer's Affiliation:
Certification Date of Observer:	Height of Discharge Point: <u>0 ft</u>
Point of Emissions: <u>Roadway/Tire Interface</u>	

CLOCK TIME	Initial	Final
OBSERVER LOCATION		
Distance to discharge	15 ft	15 ft
Direction from discharge	90 degrees	90 degrees
Height of observation point	4 ft	4 ft
BACKGROUND DESCRIPTION	<u>SKY, GRASS</u>	<u>SKY, GRASS</u>
WEATHER CONDITIONS		
Wind Direction	<u>From the S</u>	<u>From the S.</u>
Wind Speed	mph <u>12</u>	<u>12</u> mph
Ambient Temperature	F <u>50</u>	<u>50</u> F
SKY CONDITIONS (e.g., clear, overcast, % clouds, etc.)	<u>partly, clear</u>	<u>partly, clear</u>
PLUME DESCRIPTION		
Color	<u>none</u>	<u>none</u>
Distance Visible	miles	miles
OTHER INFORMATION		

SUMMARY OF AVERAGE OPACITY

Set Number	Time	Opacity (%)	
	Start - End	Sum	Average
1	<u>9:35 - 9:41</u>	<u>0</u>	<u>0</u>
2	<u>9:41 - 9:47</u>	<u>0</u>	<u>0</u>
3	<u>9:47 - 9:53</u>	<u>0</u>	<u>0</u>
4	<u>9:53 - 9:59</u>	<u>0</u>	<u>0</u>

Readings ranged from 0 to 0 % opacity.

Average of 12 readings: 0

Method 9 Visual Emissions Observation Record Form
Paved and Unpaved Roadways (Cont.)

Page 2 of 2

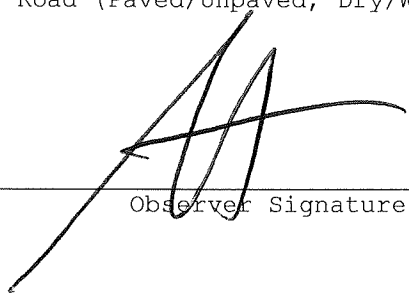
Company AZR Observer S. Andrews

Location Chicago, IL Facility Type INDUSTRIAL

Point of emissions Roadway/Tire Interface

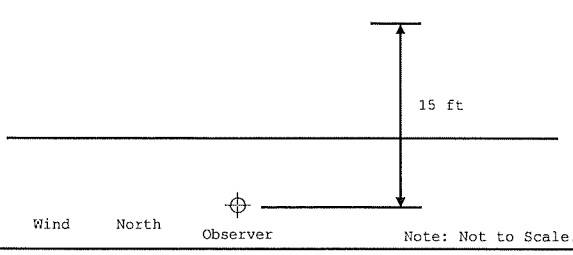
Vehicle Pass #	Seconds			Vehicle Type
	0	5	10	
1	0	0	0	CAR
2	0	0	0	CAR
3	0	0	0	CAR
4	0	0	0	TRUCK

Description of Road (Paved/Unpaved, Dry/Wet): WET, DRIZZLE


Observer Signature

11/15/17
Date

Method 9 Visual Emissions Observation Record Form
Paved and Unpaved Roadways

Company: <u>AZR</u>	Provide sketch of observer's position relative to the source: 
Address: <u>2701 E 114th St</u>	
Facility ID:	
Date: <u>11/15/17</u>	
Location Description: <u>MAIN TRUCK ROAD</u>	
Control Device: <u>H2O TRUCK</u>	
Hours of Observation: <u>1</u>	
Observer's Name: <u>S. Andrews</u>	
Certification Date of Observer:	
Point of Emissions: <u>Roadway/Tire Interface</u>	Observer's Affiliation:
Height of Discharge Point: <u>0 ft</u>	

CLOCK TIME	Initial	Final
OBSERVER LOCATION		
Distance to discharge	15 ft	15 ft
Direction from discharge	90 degrees	90 degrees
Height of observation point	4 ft	4 ft
BACKGROUND DESCRIPTION	<u>Trees / sky</u>	<u>Trees / sky</u>
WEATHER CONDITIONS		
Wind Direction	From the <u>S</u>	From the <u>S</u>
Wind Speed	mph <u>12</u>	mph <u>12</u>
Ambient Temperature	F <u>50</u>	F <u>50</u>
SKY CONDITIONS (e.g., clear, overcast, % clouds, etc.)	<u>Cloudy, DRIZZLE</u>	<u>Cloudy, DRIZZLE</u>
PLUME DESCRIPTION		
Color	<u>NONE</u>	<u>NONE</u>
Distance Visible	miles	miles
OTHER INFORMATION		

SUMMARY OF AVERAGE OPACITY

Set Number	Time	Opacity (%)	
	Start - End	Sum	Average
1	<u>10:00 - 10:06</u>	<u>0</u>	<u>0</u>
2	<u>10:06 - 10:12</u>	<u>0</u>	<u>0</u>
3	<u>10:12 - 10:18</u>	<u>0</u>	<u>0</u>
4	<u>10:18 - 10:24</u>	<u>0</u>	<u>0</u>

Readings ranged from 0 to 0 % opacity.

Average of 12 readings: 0

Method 9 Visual Emissions Observation Record Form
 Paved and Unpaved Roadways (Cont.)

Company AZR Observer S. Andrews

Location Chicago, IL Facility Type Industrial

Point of emissions Roadway/Tire Interface

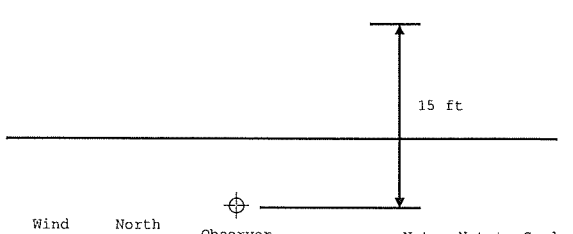
Vehicle Pass #	Seconds			Vehicle Type
	0	5	10	
1	0	0	0	TRUCK
2	0	0	0	FORKLIFT
3	0	0	0	TRUCK
4	0	0	0	TRUCK

Description of Road (Paved/Unpaved, Dry/Wet): wet

[Signature]
 Observer Signature

11/15/17
 Date

Method 9 Visual Emissions Observation Record Form
Paved and Unpaved Roadways

Company: <u>AZR</u>	Provide sketch of observer's position relative to the source: 
Address: <u>2701 E. 114th St Chicago, IL</u>	
Facility ID:	
Date: <u>11/15/17</u>	
Location Description: <u>paved Road to IRM</u>	
Control Device: <u>H₂O TRUCK</u>	
Hours of Observation:	
Observer's Name: <u>S. ANDREWS</u>	Observer's Affiliation:
Certification Date of Observer:	Height of Discharge Point: <u>0 ft</u>
Point of Emissions: <u>Roadway/Tire Interface</u>	

CLOCK TIME	Initial	Final
OBSERVER LOCATION		
Distance to discharge	15 ft	15 ft
Direction from discharge	90 degrees	90 degrees
Height of observation point	4 ft	4 ft
BACKGROUND DESCRIPTION	<u>Trees / Sky</u>	<u>Trees / Sky</u>
WEATHER CONDITIONS		
Wind Direction	From the <u>S</u>	From the <u>S</u>
Wind Speed	mph <u>12</u>	mph <u>12</u>
Ambient Temperature	F <u>50</u>	F <u>50</u>
SKY CONDITIONS (e.g., clear, overcast, % clouds, etc.)	<u>cloudy, rain</u>	<u>cloudy - rain</u>
PLUME DESCRIPTION		
Color	<u>NONE</u>	<u>NONE</u>
Distance Visible	miles	miles
OTHER INFORMATION		

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity (%)	
	Start	End	Sum	Average
1	1030	1036	0	0
2	1036	1042	0	0
3	1042	1048	0	0
4	1048	1054	0	0
Readings ranged from <u>0</u> to <u>0</u> % opacity.				
Average of 12 readings: <u>0</u>				

Method 9 Visual Emissions Observation Record Form
 Paved and Unpaved Roadways (Cont.)

Page 2 of 2

Company AZE Observer S. Andrews

Location paved road to Iron Facility Type INDUSTRIAL

Point of emissions Roadway/Tire Interface

Vehicle Pass #	Seconds			Vehicle Type
	0	5	10	
1	0	0	0	Truck
2	0	0	0	Truck
3	0	0	0	Truck
4	0	0	0	Truck

Description of Road (Paved/Unpaved, Dry/Wet): wet

SA
 Observer Signature

11/5/17
 Date



AeroMet
Engineering, Inc.
Solutions for a Changing Environment

Certification of Visible Opacity Reading

Shannon Andrews

qualified to conduct EPA Method 9 Tests for visible opacity in accordance with the methods established for such qualification in 40 CFR Part 60 Appendix A.

Certification Date: October 24, 2017

Expiration Date: April 24, 2018

AeroMet Instructor: Trey Beauchamp

AEROMET ENGINEERING INC. CERTIFIES THAT

Shannon Andrews

**has qualified as a CERTIFIED VISIBLE
EMISSIONS READER
per Title 40 Part 60 Appendix A USEPA Method 9**

Issued: 10/24/2017

Expires: 04/24/2018

Questions? Call 573.636.6393