



STATEMENT OF BASIS
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BAQ Air Permitting Division

Company Name:	Adams Scrap Recycling LLC	Permit Writer:	Jacob A. Vandenberg
Agency Air Number:	1200-0510	Date:	September 8, 2026
Permit Number:	CP-50000386 v1.0		

DATE APPLICATION RECEIVED: December 10, 2025

PROJECT DESCRIPTION

Adams Scrap Recycling, LLC has submitted a minor source construction permit application. The facility seeks authorization for several pieces of equipment for auto and metal scrap shredding, including a stationary 10-ton-per-hour (tph) shredder, a stationary 3-tph vertical mill granulator, a mobile 25-tph shredder, and a mobile 30-tph shredder. Particulate matter (PM) and metal hazardous air pollutants (HAPs) will be controlled through water-spray systems attached to each shredder. PM and metal HAP emissions from the vertical mill granulator will be controlled with a bag-filter.

The facility indicates that the mobile shredders will be moved regularly throughout the site and will not remain in a single location for more than 12 months. As a result, according to 40 CFR 1068.30, the diesel engines powering the mobile shredders are classified as non-road engines and do not require a construction permit. However, the mobile shredding operations powered by these non-road engines are included in this construction permit and are considered stationary sources regardless of being moved. In the event a mobile shredder were to remain at a single location for more than 12 months, the attached diesel engine would be classified as a stationary source and would require a construction permit.

FACILITY DESCRIPTION

SIC CODE: 5015 - Motor Vehicle Parts, Used; 5093 - Scrap and Waste Materials

NAICS CODE: 423140 - Motor Vehicle Parts (Used) Merchant Wholesalers; 423930 - Recyclable Material Merchant Wholesalers industry

Adams Scrap Recycling, LLC is a recycler of metals and other materials such as glass, paper, plastics, and electronics.

OPERATING PERMIT INCORPORATION

This construction permit shall be incorporated into a new minor source state operating permit. The facility previously operated under a conditional major operating permit; however, in 2025, the Department discovered that all permitted equipment was no longer in use and had been removed from the site. The facility submitted a permit cancellation to the Department on July 9, 2025. By letter dated August 8, 2025, the Department documented that conditional major operating permit CM-1200-0510 V1.0 had been terminated.

EMISSIONS

Emissions from the shredding process are comprised of particulates and VOC. A small portion of particulate emissions are metal HAPs, such as Chromium, Mercury, and Nickel. Particulate emissions from the 3 tph vertical mill granulator (G3) are controlled by a bag filter. Water spray systems are used to control emissions from the stationary 10 tph shredder (S2), mobile 25 tph shredder (EX-S5), and mobile 30 tph shredder (EX-S6).

S2 and G3 are electrically powered and have no engine emissions. Both mobile shredders (EX-S5 & EX-S6) are powered by diesel combustion engines which meet the definition of non-road engines. The Clean Air Act, Section 302(z) defines a stationary source and specifically excludes emissions from nonroad engines as stationary sources.

VOC emissions from shredding are calculated conservatively using an emission factor of 0.31 lb/ton, expressed as pounds of VOC per net ton of feed, obtained from ISRI's *VOC Emissions Guidance for Metal Shredders* (December 2023,



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Table 3-2). VOC emissions from metal shredders are associated with organic liquids that may be present in feed materials and that can vaporize during the shredding process. ISRI's guidance states source control is an effective strategy used by industry to minimize shredder VOC emissions, including the removal of organic liquids from feed materials prior to shredding. Adams Scrap Recycling will be required to document that, to the extent practicable, automotive fluids (e.g., engine coolant, gasoline, motor oil, automatic transmission fluid) have been drained, all batteries have been removed, and all mercury switches have been removed from 2002 and older model year vehicles prior to shredding any automobiles. Such source controls may further reduce actual VOC emissions below the levels estimated.

Due to limited published information on fugitive particulate emissions from shredders, the facility uses PM emission factors from AP-42 Table 11.19.2-2 (Fines Crushing, 8/04), as a more conservative approach. Fugitive PM emissions from multiple shredder drop points are calculated using the 'drop equation' from AP-42, Section 13.2.4.3 (11/06).

HAP emissions from shredding are calculated using methods found in OK Dept. of Environmental Quality Permit Memorandum, March 2022, Page 5, and are based on the maximum concentration of metal HAP found in auto shredder residue (ASR). Individual HAP emissions from shredding are calculated using the equation below.

$$HAP \text{ Emission Rate } \left(\frac{lb}{hr} \right) = PM \text{ Emission Rate } \left(\frac{lb}{hr} \right) \times \frac{Max. \text{ HAP Composition in ASR (ppmw)}}{Total \text{ of Non - Metal and Metal PM in ASR (ppmw)}}$$

In accordance with the OK Dept. of Environmental Quality Permit Memorandum, March 2022, and based on TCEQ Rock Crushing Guidance, a 70% control efficiency is applied to the water spray control systems, accounting for partial housing enclosure and scrap specifications. Additionally, a conservative control efficiency of 70% is applied to the bag filter.

PROJECT EMISSIONS						
Pollutant	Uncontrolled		Controlled		PTE	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
VOC	21.08	92.33	--	--	21.08	92.33
PM	2.65	11.62	0.80	3.49	2.65	11.62
PM ₁₀	1.02	4.47	0.31	1.34	1.02	4.47
PM _{2.5}	1.02	4.47	0.31	1.34	1.02	4.47
Lead	5.38E-04	2.36E-03	1.61E-04	7.07E-04	5.38E-04	2.36E-03
Antimony	1.08E-04	4.71E-04	3.23E-05	1.41E-04	1.08E-04	4.71E-04
Arsenic	2.69E-05	1.18E-04	8.07E-06	3.53E-05	2.69E-05	1.18E-04
Beryllium	1.34E-06	5.89E-06	4.03E-07	1.77E-06	1.34E-06	5.89E-06
Cadmium	1.08E-04	4.71E-04	3.23E-05	1.41E-04	1.08E-04	4.71E-04
Chromium	6.72E-04	2.95E-03	2.02E-04	8.84E-04	6.72E-04	2.95E-03
Mercury	6.72E-05	2.95E-04	2.02E-05	8.84E-05	6.72E-05	2.95E-04
Nickel	3.39E-04	1.48E-03	1.02E-04	4.45E-04	3.39E-04	1.48E-03
Selenium	1.34E-05	5.89E-05	4.03E-06	1.77E-05	1.34E-05	5.89E-05
Total HAP	1.34E-03	5.85E-03	4.01E-04	1.75E-03	1.34E-03	5.85E-03



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FACILITY WIDE EMISSIONS			
Pollutant	Uncontrolled	Controlled	PTE
	TPY	TPY	TPY
VOC	92.33	--	92.33
PM	11.62	3.49	11.62
PM ₁₀	4.47	1.34	4.47
PM _{2.5}	4.47	1.34	4.47
Lead	2.36E-03	7.07E-04	2.36E-03
Antimony	4.71E-04	1.41E-04	4.71E-04
Arsenic	1.18E-04	3.53E-05	1.18E-04
Beryllium	5.89E-06	1.77E-06	5.89E-06
Cadmium	4.71E-04	1.41E-04	4.71E-04
Chromium	2.95E-03	8.84E-04	2.95E-03
Mercury	2.95E-04	8.84E-05	2.95E-04
Nickel	1.48E-03	4.45E-04	1.48E-03
Selenium	5.89E-05	1.77E-05	5.89E-05
Total HAP	5.85E-03	1.75E-03	5.85E-03

Note: Facility-wide potential emissions are based on 8760 hours per year of operation; however, the construction permit limits the operating hours of the metal shredding equipment to between the hours of 5 AM and 8 PM.

SPECIAL CONDITIONS, MONITORING, LIMITS

Because the mobile shredders will be moved throughout the facility and will not remain at a single location for more than 12 months, the mobile shredder engines qualify as non-road. Therefore, they are not subject to the requirements of NSPS Subpart IIII or NESHAP Subpart ZZZZ. However, if the shredder engines remain in the same location for more than 12 months at any point, they will be classified as stationary sources requiring an air quality permit and become subject to NSPS Subpart IIII and NESHAP Subpart ZZZZ. To document and verify their non-road status, the facility shall maintain on-site records documenting the dates each shredder engine is relocated and its corresponding location (Condition B.11).

In response to public comments expressing concern about operations occurring at night, the Department has discussed limiting the operating hours of the shredding equipment with the facility, and the facility has agreed to restricting shredder operations to between the hours of 5:00 AM and 8:00 PM. Condition B.12 of the construction permit restricts all metal shredding activities to operate between the hours of 5:00 AM and 8:00 PM. The owner or operator must record the initial operating start time and the final stop time daily and submit these records annually. As stated in the emissions section above, facility-wide emission calculations are conservatively based on 8760 hours of operation per year despite the hours of operation limit.

REGULATIONS

Not Applicable - Section II(E) (Synthetic Minor)

The facility is a true minor source. No synthetic minor limits are established as part of this construction permit.



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Not Applicable - Standard No. 1 (Emissions from Fuel Burning Operations)

This project does not contain any sources which meet the definition of a 'Fuel Burning Operation' as defined in SC Regulation 61-62.1, Section I.

Not Applicable - Standard No. 3 (state only) (Waste Combustion and Reduction)

This project does not contain any waste burning sources.

Applicable - Standard No. 4 (Emissions from Process Industries)

The facility is subject to the Standard No. 4, Section IX(B), 20% opacity limit. Additionally, all permitted sources are subject to the Standard No. 4, Section VIII, PM emission limit (see table below).

Process	Max Process Weight Rate (tons/hr)	PM Allowable at Max (lb/hr)	Uncontrolled Emissions PM (lb/hr)	Controlled Emissions PM (lb/hr)	Monitoring
S2	10	19.18	0.39	0.12	The facility will monitor water spray systems and bag filter pressure drop to best minimize emissions.*
G3	3	8.56	0.12	0.04	
EX-S5	25	35.43	0.98	0.29	
EX-S6	30	39.96	1.17	0.35	

*The facility's uncontrolled PM emissions demonstrate compliance with the limit; however, the permit requires monitoring of control devices to further reduce PM.

Not Applicable - Standard No. 5 (Volatile Organic Compounds)

The facility is not an 'existing process' because it was not in existence or under construction in 1979 or 1980, and its potential to emit VOCs is less than 550 lb/day and 150 lb/hr.

Not Applicable - Standard No. 5.2 (Control of Oxides of Nitrogen (NO_x))

The provisions of this regulation apply to any stationary source that emits or has the potential to emit oxides of nitrogen (NO_x) generated from fuel combustion. The non-road diesel engines are not considered stationary sources; therefore, they are exempt.

Not Applicable - Standard No. 7 (Prevention of Significant Deterioration)

The facility is not one of the sources listed in Standard 7(B)(32)(a)(i). Therefore, applicability is based on the potential to emit 250 tons per year of a regulated NSR pollutant, as described in Standard 7(B)(32)(a)(ii). The facility's potential to emit of all regulated pollutants is less than 250 tons per year.

Applicable - 61-62.6 (Control of Fugitive Particulate Matter)

This regulation applies to all facilities. The facility will monitor bag filter and water spray control devices to best minimize fugitive emissions.

40 CFR 60 and 61-62.60 (New Source Performance Standards (NSPS))



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Not Applicable - Subpart IIII (Stationary Compression Ignition Internal Combustion Engines)

The diesel engines are considered a non-road engine; therefore, it does not meet the definition of a stationary internal combustion engine per § 60.4219.

40 CFR 61 and 61-62.61 (National Emission Standards for Hazardous Air Pollutants (NESHAP))

Not Applicable - This facility does not emit the pollutants in a way that is subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride).

40 CFR 63 and 61-62.63 (National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories)

Not Applicable - ZZZZ (Stationary Reciprocating Internal Combustion Engine (RICE))

The diesel engines are considered a non-road engine; therefore, it does not meet the definition of a stationary reciprocating internal combustion engine (RICE) per § 63.6675.

Not Applicable - 61-62.68 (Chemical Accident Prevention Provisions)

The facility does not store or use any chemicals subject to 112(r) above the threshold quantities.

Not Applicable - 40 CFR 64 (Compliance Assurance Monitoring)

The facility is not a major source of air pollutants.

AMBIENT AIR STANDARDS REVIEW

Applicable - Standard No. 2 (Ambient Air Quality Standards)

All sources are below the modeling exemption threshold for Standard No. 2 pollutants.

Applicable - Standard No. 8 (state only) (Toxic Air Pollutants)

The South Carolina Modeling Guidelines for Air Quality Permits, Section 2.3.2, states if a toxic chemical is classified as an OSHA carcinogen and is less than 0.1% of the air emissions by weight (excluding the weight of dilution components such as air, water vapor, oxygen, nitrogen, and carbon dioxide), then it can be considered a true trace emission and need not be included in the Standard 8 compliance demonstration. Nickel is an OSHA carcinogen, and emissions are less than 0.1% of air emissions by weight; therefore, it is exempt from this standard. All other toxic air pollutant emission rates are at or below the Standard No. 8 de minimis rate.

PERIODIC MONITORING					
ID	Applicable Requirement	Measured Parameter	Required Monitoring Frequency	Reporting Frequency	Monitoring Basis/ Justification
WS102 WS105 WS106	Standard No. 4 PM	Liquid flow rate and visual inspection (Condition B.7 & B.8)	Daily within the first hour of operation	Maintained in logs & kept on site for review; annual reporting of all occurrences	Bag filter and water spray system monitoring is sufficient for minimizing particulate emissions.



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PERIODIC MONITORING					
ID	Applicable Requirement	Measured Parameter	Required Monitoring Frequency	Reporting Frequency	Monitoring Basis/ Justification
BF103	Standard No. 4 PM	Pressure drop (Condition B.9)		outside of operational ranges	
		Filter condition (Condition B.9)	Weekly	Maintained in logs & kept on site for review	
S2 G3 EX-S5 EX-S6	S.C. 61-62.1, Section II(J)(2) - Hours of operation limit	Actual operating hours (Condition B.12)	Daily	Annually	Daily recordkeeping of actual operating hours is sufficient for demonstrating compliance.
Facility-Wide	S.C. 61-62.1, Section II(J)(2) – Source Control	Vehicle model year, fluid & battery removal, mercury switch removal (Condition B.10)	Each vehicle prior to shredding	Kept onsite and made available for Department review upon request	Documentation of source control conducted on each vehicle is sufficient for demonstrating compliance.

PUBLIC NOTICE

This construction permit has undergone a 30-day public notice period, and a public hearing was held on April 23, 2026. The comment period was open from March 24, 2026 to April 24, 2026 and the draft permit was placed on the BAQ website during that time period. Comments were received during the comment period.

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.